

Brighton & Hove City Plan Part One

March 2016

Sustainability Appraisal Reports



Brighton & Hove
City Council

Background

As part of the plan preparation process a Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) must be undertaken. An SA report has been produced at various stages of the City Plan Part 1.

In order to meet the adoption procedures set out in Regulation 16 (1b) of the Environmental Assessment of Plans and Programmes Regulations 2004, a copy of the Environmental Report (SA) which accompanies the adopted Plan must be available at its principal office for inspection by the public.

The Environmental Report of the adopted City Plan Part 1 consists of four separate reports as follows:

- Sustainability Appraisal: Submission City Plan (2013)
- Sustainability Appraisal Addendum: Proposed Modifications to the City Plan (October 2014)
- Sustainability Appraisal Addendum: Further Modifications to the City Plan (June 2015)
- Sustainability Appraisal Addendum: Further Modifications to Policy CP8 (September 2015)

This report brings together these four separate reports. It should be noted that information presented in the Addendum Reports supersedes previous versions only where applicable.

Brighton & Hove Submission City Plan Part One

Proposed Further Modifications to Policy CP8 Sustainable Buildings

September 2015

Sustainability Appraisal Addendum



**Brighton & Hove
City Council**

Sustainability Appraisal Addendum

Further Modifications to Policy CP8 Sustainable Buildings September 2015

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Section 1 Introduction

Background

Brighton & Hove City Council began the preparation of the City Plan Part 1 Development Plan Document (DPD) in October 2011 which followed on from work to progress its Core Strategy that commenced in 2005. As part of this process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken (hereinafter referred to as SA).

A SA Report has been produced at various stages, as can be seen in the following table, documenting the SA process and the assessment results up to that point. Brighton & Hove City Council submitted the City Plan Part 1 in June 2013. The Examination in Public on the Submission City Plan Part 1 was held between the 22nd and 31st October 2013.

Stage of Plan Preparation & SA	Date
Policy Options Papers – City Plan Part 1	October 2011
Draft City Plan Part 1	June 2012
Submission City Plan Part 1	February 2013
City Plan Part 1: Proposed Modifications	October 2014
City Plan Part 1: Further Modifications	June 2015
City Plan Part 1: Further Modifications to CP8	September 2015

Following the EIP, a number of proposed modifications to the Submission City Plan were put forward and consulted upon between October and December 2014, including an SA of the proposed modifications. The results of this consultation were submitted to the Planning Inspector and resulted in the publication of the Inspector's Further Issues and Matters in April 2015.

A number of further proposed modifications were then put forward, to respond to the Inspector's Further Issues and Matters, or respond to consultation comments. The further modifications, including SA, were consulted upon between June and August 2015.

During this period of consultation, the Government published Fixing the Foundations, which confirms the intention to remove the Zero Carbon Homes Allowable Solutions scheme and the requirement for residential development to meet increased energy standards. The Inspector subsequently wrote to the Council with two possible courses of action to ensure that the City Plan was in conformity with national policy, particularly regarding policy CP8 Sustainable Buildings.

Further modifications have therefore been put forward to policy CP8. Any modification must be subject to SA to ensure the likely sustainability effects of implementing the Plan are assessed, documented and understood.

Purpose of this report

This purpose of this Addendum report is therefore to assess the sustainability implications associated with the further modifications to the Submission City Plan that have arisen from:

- Changes to policy CP8: Sustainable Buildings.

With the exception of the assessment of policy CP8, this report does not repeat information produced in the Submission SA, February 2013, nor the subsequent Addendums, and should therefore be read alongside these documents.

Next Steps

This SA report will be consulted upon alongside the revised policy CP8: Sustainable Buildings. Representations received during this period of consultation will then be considered by the Planning Inspector as part of the process of Examination of the City Plan Part 1.

Section 2 Changes affecting the Sustainability Appraisal Report

In order to ensure any new appraisal is placed within the current context, a review of the Plans, Policies and Guidance section, any local evidence, the baseline situation and the Sustainability Issues section of the Submission 2013 City Plan Sustainability Appraisal has taken place.

This review was also undertaken in October 2014, for the City Plan Proposed Modifications Sustainability Appraisal Addendum October 2014 and in June 2015 for the City Plan Further Modifications Sustainability Appraisal Addendum. Since this time, there has been one key change which is considered to be significant and has resulted in the change to policy CP8: Sustainable Building.

Plans, Policies and Guidance

The Government recently published [Fixing the Foundations: Creating a More Prosperous Nation](#) (July 2015). Section 9.17 reads as follows:

The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review, recognising that existing measures to increase energy efficiency of new buildings should be allowed time to become established.

Baseline Data

The very nature of baseline data means that it is constantly evolving. Some data, such as the Census 2011 data, which is useful for context has been released since the last Submission City Plan SA 2013. Although it is useful, it is not considered necessary to update the entire baseline data table at this stage. Monitoring the SA indicators in the Authorities Monitoring Report continues to present the opportunity to update and publish some of this updated data, allowing for trends to be analysed.

Sustainability Issues

The key Sustainability issues for the city continue to be:

Environmental:

- The Ecological Footprint is higher than the regional and national average, with household energy consumption attributable for 23% of the ecological footprint
- The need to continue to reduce carbon emissions from all sources, with the percentage of carbon tonnes per capita attributable to domestic consumption proportionally greater than the regional and national averages
- Flood risk; including tidal, surface water and groundwater
- Air quality; NO₂ levels continuing to exceed the Air Quality Objective particularly in central locations, but also in some more outlying areas
- Congestion, noise and poor air quality resulting from transport
- Groundwater quality (Brighton Chalk Aquifer) classified as “poor”
- The city is within a “highly water stressed” region with above regional average water consumption
- An additional 167ha of various types of open space will need to be provided by 2030 in order to maintain its quantity standards

Social:

- The population of Brighton & Hove increased by over 10% in the period between 2001 and 2011
- The city has the highest rate of over-crowding outside London
- The city's housing remains largely unaffordable to the majority of its residents, with the average property costing over ten times the average income
- The annual housing need for both affordable and market housing is far greater than actual build levels
- The city is ranked as the 66th most deprived in England
- Health inequalities exist throughout the city with marked differences in life expectancy between the most deprived and most affluent areas

Economic

- The city exports a high number of workers and needs to develop high value businesses locally to retain higher skilled workers
- The city lacks affordable business accommodation
- There is evidence of the city developing a dual economy, with a high proportion of highly skilled jobs supported by a growing number of lower paid workers
- 8% of the working age population have no qualifications and educational attainment in secondary schools is below average
- The universities are growing along with the increasing requirements for student accommodation

Key positive sustainability achievements include:

- An overall reduction in CO2 tonnes per capita since 2005
- Levels of car ownership lower than national and regional averages
- Levels of travel to work by car lower than national and regional averages
- Year on year reduction of percentage of waste being disposed of at landfill
- The city contains a wealth of diverse designated wildlife sites of international, national and local significance
- The city includes areas of land falling within the South Downs National Park
- The city has an extremely attractive historic built environment including over 3400 listed buildings, 15 Scheduled Ancient Monuments, 6 Registered Parks and Gardens and 34 Conservation Areas.
- The city has one of the most highly qualified adult populations in the country, with 43% having a Level 4 (or equivalent) qualification
- The city contains the Regional Shopping Centre and contains significantly more shops compared to other city's of similar size, including a strong reputation for specialist retailers
- The city is a regional centre for employment and is home to the biggest cluster of creative and digital technology industries in the south east outside London
- Housing delivery in the city is showing signs of recovery from the economic recession, with housing completions increasing annually since 2010/2011 although still not reflective of pre-recession rates.

Section 3: Summary of Policy Re-assessment – CP8 Sustainable Buildings v.1

This section summarises the main findings of the SA appraisal. The full assessment of the changes to CP8 v.1 against the SA Framework can be found in Appendix B.

The main changes to the policy (V.1) at this stage can be summarised as follows:

- Change in policy wording from “require” to “seek” in the first paragraph
- Change in policy wording from “required” to “expected” in Part 1 of the policy; referring to minimum standards to be achieved.
- Change in policy wording from “required” to “expected” in Part 2 of the policy; referring to the sustainability benefits development should demonstrate.
- Deletion of the requirement for new residential development to meet zero carbon homes standards. Replaced with standard carbon reduction improvement (19% improvement over Part L Building Standards).
- Deletion of the requirement for conversions to residential to meet BREEAM very good. No replacement standard.
- Deletion of the requirement for all non-residential development to meet BREEAM “outstanding” post 2019, with development now expected to meet either “very good” or “excellent” depending on size.
- Change in policy wording from “incorporates” to “facilitates” on site low or zero carbon technologies
- Deletion of all references to the Allowable Solutions scheme and the ability to secure developer contributions from schemes that don’t meet standards as mitigation

Summary of Impacts on SA Objectives from this stage

Overall Summary

The amendments to the policy were found to change the assessment findings of the previous iteration of the policy for the following objectives: biodiversity (1), air quality (2), water pollution (7), water consumption (8), development of contaminated land (9), health (13), deprivation (15), making the best of previously developed land (17), sustainable energy and climate change mitigation (18), climate change adaptation (19), meeting BREEAM (20), reducing waste (22). All of these impacts were changed from either positive or significantly positive (+) or (++) to positive uncertain (+?) across all timescales. This is based on the policy still having the potential to have positive impacts across these objectives, through the delivery of various sustainable building design features, however is considered to be uncertain due to the change in policy text from “requires” to “expects”, which no longer makes it an actual requirement to meet targets or deliver features set out in the policy.

The impacts for the housing (5) and economic development (12) objectives were still found to be positive uncertain (+?). This is based on the change in policy wording, and the removal or change in various standards which may help to bring house-building forward and stimulate economic growth, although this is also considered uncertain.

Overall the policy still has the potential to deliver positive impacts, particularly for the environmental objectives, however these are more uncertain and are not as positive as previous iterations of the policy. The SA considers the ability of the policy to secure sustainability benefits and achieve the desired standards to be compromised.

Impacts on SA objectives of change in policy wording from “requires” to “expects”

The removal of the word “requires” removes the council’s ability to formally ensure that desired standards set out in Part 1 of the policy are achieved, and the sustainability benefits set out Part 2 of the policy are delivered. This change in wording could result in few sustainability benefits being achieved or delivered and brings about a great deal of uncertainty across all environmental SA objectives.

Overall, the SA found this change in wording to weaken the policy and compromises the ability of the policy to secure and deliver sustainability benefits.

At Further Modifications (July 2015) stage, the SA concluded that the removal of the requirement to meet the Code for Sustainable Homes, an assessment tool which is externally audited and certified, meant that the ability of the policy to ensure delivery of wider sustainability benefits, was somewhat compromised. At that stage, however part 2 (a-o) of the policy still required development to demonstrate various sustainable design features. Now that the formal requirement to demonstrate these features has been replaced with expected, the SA considers the policy to be weakened further.

Impacts on SA objectives from removal of requirement for residential development to meet zero carbon homes standards

The requirement to meet zero carbon homes standards has now been replaced with the “expectation” to meet the 19% carbon reduction against Part L Building Regulations 2013. This is not as strong as the previous policy position which would have meant achieving 100% carbon reduction against Part L (post 2016) and has direct implications for energy consumption, carbon emissions, the local ecological footprint and climate change and is directly related to SA objective 18 – maximise sustainable energy and mitigate climate change.

This also impacts upon SA objective 13 – health, and SA objective 15 – deprivation, due to the potential for zero carbon homes to have helped address fuel poverty in new development, as well as potentially in existing housing stock through the Allowable Solutions scheme. Although homes built to the new standard will have increased energy efficiency compared to building standards, they will not be as efficient as they could have been under previous iterations, with highly efficient homes clearly benefitting all, but particularly benefitting those that may be suffering from economic deprivation.

The Brighton & Hove Energy Study 2012 maps out how carbon reduction targets can be met. At the time, it found that new development was expected to increase the carbon footprint by 8%, and relied on various other measures to ensure carbon reduction targets are met, including 19% of the carbon reduction coming from the retrofit of existing residential buildings and 11% from the retrofit of non-residential developments. However the Energy Study was based on new residential development from 2016 meeting 100% carbon reduction improvement against Part L Building Standards. This means that carbon reduction from other sources will now need to be even greater if the city is to achieve its carbon reduction targets and questions the ability to achieve these targets.

The removal of this requirement could have positive impacts on SA objective 5 – housing delivery and SA objective 12 – economic development. It is the government’s intention to “remove un-necessary burdens” from house-building in order to stimulate economic growth. Therefore the change in requirements could help to bring forward house-building, having positive implications for economic development, however there is no evidence to support this, and is therefore considered to be uncertain.

Impacts on SA objectives from removal of requirements for residential conversions/change of use to meet BREEAM “very good” standards

The requirement for conversions / change of use to residential to meet BREEAM “very good” has been deleted entirely and not replaced with any other standard. This is considered to directly impact on SA objectives 7 – pollution to water; 8 – water consumption; 13 – health; and 18 – sustainable energy, as the BREEAM Refurbishment standard required development to achieve mandatory credits across all these issues. Part 2 of the policy still “expects” conversions to demonstrate how various issues are addressed, but as discussed above, this is no longer a requirement and may result in less sustainability benefits being delivered from conversions.

For context, over the five year period from 2009/10 to 2013/14 an average of 34% of residential completions have been from either conversions or changes of use. This represents a fairly high proportion of developments that will no longer be required to meet any kind of sustainability standards in the future.

Impacts on SA objectives from removal of requirement for non-residential development to meet BREEAM “outstanding” post 2019.

Non-residential development is no longer “required” to meet “outstanding” BREEAM in the post 2019 period but instead is “expected” to achieve either “very good” for non-major or “excellent” for major. This is not as strong as previous policy iterations and is considered to directly impact upon SA objectives 1 – biodiversity, 8 – water consumption, 18 – sustainable energy/climate change mitigation, 20 – meeting BREEAM standards and 22 waste reduction, as the BREEAM scheme requires development to achieve mandatory credits for these issues, with more being asked from developments in order to achieve the outstanding standard. This will particularly impact on the amount of energy used and carbon emitted from the development, with much higher standards expected in order for a development to achieve outstanding.

The removal of this requirement could have positive impacts on SA objective 12 – economic development as could help to bring forward the building of new commercial, office, industrial or retail development. However, this is fairly uncertain.

Impacts on SA objectives from removal of ability to secure developer contributions from development through the Allowable Solutions scheme

The Allowable Solutions scheme was linked to the Zero Carbon Homes standard and provided a mechanism for the potential pooling of money, secured from development which could not meet its on-site energy efficiency requirements in full. These could then have been used to improve the energy efficiency of existing housing stock. As described above, the Energy Study 2012 concluded that improvements to the existing building stock would be required for the city to meet its CO2 reduction targets. The removal of the Allowable Solutions scheme and the potential to secure funding through developer contributions, combined with the lowering of energy standards will therefore lead to an increase the energy consumed, as well as removes the potential for improving existing stock and will have implications on the city’s ability to meet CO2 reduction targets. This impacts directly upon SA objective 18 – energy and mitigating climate change. This may also have implications for fuel poverty, affecting SA objectives 13 - Health and 15 – Deprivation.

The removal of this requirement could have positive impacts on SA objective 5 – housing delivery and SA objective 12 – economic development as the removal of this requirement would reduce the costs for house-builders, improve viability and potentially bring forward house-building.

Initial SA Recommendations

The changes to Policy CP8 will result in less positive impacts against various environmental objectives. These impacts are also considered to be uncertain compared to previous iterations of the policy.

It is understood that the majority of the changes have been made in order to ensure the policy does not conflict with national requirements and therefore cannot be avoided. However, the SA recommends that the wording is changed back to “required”, where possible, in order to strengthen the policy and ensure minimum standards are met and to ensure the policy’s ability to secure sustainability benefits is not completely compromised.

City Plan Response

Policy CP8 wording in Part 1 will be revised as follows:

- 1. All development will be required ~~expected~~ to achieve the minimum standards as set out below ~~or equivalent standards from a quality assured scheme unless superseded by national policy of legislation~~**

No further revisions will take place.

Section 4: Summary of Policy Re-assessment – CP8 Sustainable Buildings V.2

Following the further revisions to the policy, which took into consideration the initial sustainability appraisal findings, further assessment against the Sustainability Appraisal Framework has taken place. To summarise, the change to V. 2 reverts back to some of the original policy text, by deleting the word “expected” as follows:

Policy CP8 wording in Part 1 will be revised as follows:

1. All development will be **required** ~~expected~~ to achieve the minimum standards as set out below ~~or equivalent standards from a quality assured scheme unless superseded by national policy of legislation~~

Summary of SA findings which have changed as a result of V.2 policy change

Version 2 of the policy is considered more likely to result in positive impacts for some objectives than version 1 of the policy that the SA assessed at this Further Modifications stage, as can be seen in the table below.

Impacts of the revised policy wording in Part 1 referring to the minimum standards required

This change in wording to Part 1 of the policy was found to have an impact on the sustainability appraisal findings against SA objectives 1 – biodiversity, 8 – water consumption, 18 – energy consumption/climate change mitigation, 20 – meeting BREEAM standards and 22 – waste reduction. The change in policy wording was found to remove the uncertain impact, leading to a positive impact (+) against these objectives. These positive impacts are due to the BREEAM scheme requiring mandatory credits for: minimising the impact on ecology, minimising water consumption, reducing energy consumption and carbon emissions, and reducing operational waste. In addition, the requirements for residential development to meet energy standards and minimise water consumption impact positively on the objectives for water and energy consumption.

Summary of SA findings which remain unchanged from V1

The impacts on SA objectives 2 – air quality, 5 - housing, 7 – water pollution, 9 – contaminated land, 12 – economic development, 13 - health, 15 - deprivation, 17 – previously developed land, and 19 - climate change adaption all remain unchanged from the first assessment and were found to be positive uncertain (+?). Further justification is provided below.

Change in policy wording from “required” to “expected” in Part 2 of the policy; referring to the sustainability benefits development should demonstrate.

Part 2 of the policy sets out certain issues to address which includes air quality, flood risk, land contamination, making the best use of land and climate change adaptation. This could bring about some positive impacts against relative SA objectives 2, 7, 9, 17 and 19. However there is still uncertainty as to whether any of these issues will be addressed due to the change in policy wording in Part 2. None of these issues are mandatory requirements within the BREEAM scheme, and therefore would not be delivered as part of meeting the standard, unlike those relating to biodiversity, water consumption, energy consumption and waste reduction.

This uncertainty is also considered to impact upon the SA objective for health (13), as all of these issues can be indirectly linked to health.

Deletion of the requirement for new residential development to meet zero carbon homes standards post 2016 and deletion of all references to the Allowable Solutions scheme and the ability to secure developer contributions

The removal of this requirement will impact upon the energy consumed by residential developments, affecting SA objective 18 – energy/climate change mitigation, and prevents the impact from being significantly positive. However, overall the impact for this objective is considered to be positive for this objective, due to other policy requirements for both residential and non-residential development set out in Part 1.

The removal of the zero carbon homes standard and the Allowable Solutions scheme could indirectly impact upon SA objectives for health (13) and deprivation (15). This is due to the potential for zero carbon homes to have helped contribute towards addressing fuel poverty in new development, as well as potentially in existing housing stock. The combination of changes to the policy has resulted in the positive impact for health being less significant than former iterations.

Deletion of the requirement for residential conversions/change of use to meet BREEAM “very good” standards

The removal of this requirement is considered to directly impact on SA objectives 7 – pollution to water; 8 – water consumption; 13 – health; and 18 – sustainable energy, as the BREEAM Refurbishment standard required development to achieve mandatory credits across all these issues. The deletion of this part of the policy contributes towards the reduction in positive impact for some of these objectives, from significantly positive in previous versions of the policy, to positive. Part 2 of the policy still “expects” conversions to demonstrate how various issues are addressed, but as discussed above, this is no longer a requirement, may result in less sustainability benefits being delivered from conversions and is fairly uncertain.

Removal of requirement for non-residential development to meet BREEAM “outstanding” post 2019.

The lower standard required to be met by non-residential development is not as strong as previous policy iterations. It is considered to directly impact upon SA objectives 1 – biodiversity, 8 – water consumption, 18 – sustainable energy/climate change mitigation, and 22 waste reduction, as the BREEAM scheme requires development to achieve mandatory credits for these issues, with more being asked from developments in order to achieve the outstanding standard. This will particularly impact on the amount of energy used and carbon emitted from the development, with much higher standards expected in order for a development to achieve outstanding. This change in standard contributes towards the reduction in positive impact, from significantly positive in previous versions, to positive.

Overall impacts on SA Objectives for Housing and Economic Development

The SA still found the impacts for the housing (5) and economic development (12) objectives resulting from all the modifications to be positive uncertain (+?). This is based on the removal or change in

various standards, as well as the change in policy requirements in Part 2, which may help to bring development forward and stimulate economic growth, although this is also considered uncertain.

Conclusion

There is greater certainty that minimum standards will be achieved in all new development with version 2 of the policy and this should result in improved impacts compared to version 1 for some environmental objectives. In particular, this should result in positive impacts for water and energy consumption, and will also have some positive impacts for biodiversity and waste reduction.

There is still considered to be uncertainty for some of the other environmental objectives with this version, mainly due to the wording in Part 2. This change in wording is considered to compromise the ability of the policy to secure additional sustainability benefits and could impact upon air quality, water pollution, land contamination, making the most of previously developed land and climate change adaptation, with the impacts on these objectives considered to be positive uncertain.

Impacts on health and deprivation are also considered to be positive uncertain, due to the uncertainty over whether the policy will deliver additional sustainability benefits, and also due to the removal of policy wording, including the Allowable Solutions scheme, that could have contributed towards reducing fuel poverty.

Impacts on housing and economic development are also considered to be positive uncertain, due to the potential for the change in requirements to help bring forward house-building

		Sustainability Objectives																					
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/GSH	21 Accessibility	22 Waste
Stage of Plan / Modification	Sub 2013	++	+			-	+	+	++				++		+		+	++	+	++		+	
	P.M. Oct 2014	++	+			+	+	++	++	+			++		+			++	+	++		+	
	F.M. July 2015	+	+			+?	+	++	+	+		+?	++		+?		+	+	+	++		+	
	F.M. Sep 2015 (V1)	+?	+?			+?		+?	+?	+?		+?	+?		+?		+?	+?	+?	+?		+?	
	F.M Sep 2015 (V2)	+	+?			+?		+?	+	+?		+?	+?		+?		+?	+	+?	+		+	

The extent of the positive impacts that are likely to arise from implementation of this policy will not be as significant as versions of the policy at either Proposed Modifications or Submission stages. This can be seen in the above table.

Section 5: Implications of the changes to CP8 on other City Plan policies

Policy CP8 Sustainable Buildings has been cited in various versions of the SA as providing mitigation for various policies. This includes all the Development Area policies, with CP8 in particular helping to ensure that consumption of natural resources associated with the levels of development set out in the policies would be minimised as far as possible, along with mitigating other various impacts and ensuring that various other sustainability benefits would be achieved.

In former iterations, certain Development Area policies had specific requirements to meet a certain environmental standard. Over time, these specific requirements have been removed and replaced with the requirement to meet standards set out in CP8. As the standards set out in CP8 have now been changed, this will impact upon the standards achieved by development associated with those policies.

In addition, as a cross-cutting policy, it will apply to all development coming forward over the plan period, for instance development associated with some of the other city-wide policies such as CP1 Housing Delivery, CP4 Retail and CP6 Visitor Accommodation. All development delivered across Brighton & Hove will be affected by the change to CP8, with the result that lower environmental building standards will be achieved than previous iterations of the Plan having various environmental impacts. In addition, the change in wording from “required” to “expected” in Part 2 of the policy may result in few additional sustainability benefits being achieved other than those that form part of the mandatory requirements for the BREEAM standard.

The following table provides a summary of the policies whereby the SA has cited policy CP8 as providing mitigation against some of the development impacts. The reduction in standards and change in policy wording will impact on the type and amount of sustainability benefits delivered by development associated with all of these policies. Impacts that have been highlighted are those that are considered to be more uncertain in terms of whether CP8 (v.2) will provide mitigation.

Policy	Policy Name	SA referred to policy impacts being mitigated by CP8
DA1	Brighton Centre	To mitigate various impacts including: water consumption, flood risk , energy consumption, climate change adaptation , waste production.
DA2	Brighton Marina	To mitigate various impacts including: ecological impacts, water consumption, flood risk , climate change adaptation , waste production.
DA3	Lewes Road	To mitigate various impacts including: surface water flood risk , climate change adaptation , waste production. Also, to ensure environmental building standards are achieved in accordance with local standards.
DA4	New England Quarter	To mitigate various impacts including surface water flood risk , water consumption, to adapt to

Policy	Policy Name	SA referred to policy impacts being mitigated by CP8
		climate change , to ensure high environmental standards are met, facilitate waste reduction.
DA5	Edward Road and Eastern Street	To mitigate various impacts including surface water flood risk , water consumption, to adapt to climate change , to ensure high environmental standards are met, facilitate waste reduction.
DA6	Hove Station	To mitigate various impacts including, water consumption, energy consumption, to adapt to climate change , to ensure high environmental standards are met, facilitate waste reduction.
DA7	Toads Hole Valley	To mitigate various impacts including, ecological, water consumption, energy consumption, to address surface water flood risk, adapt to climate change , to ensure high environmental standards are met, facilitate waste reduction.
DA8	Shoreham Harbour	To mitigate various impacts including water consumption, surface water flood risk , ensuring high environmental standards are achieved, facilitate waste reduction.
SA1	The Seafront	To mitigate various impacts including water consumption, energy consumption and to ensure high environmental standards are achieved.
SA2	Central Brighton	To mitigate various impacts including ecological, surface water flood risk , water consumption, energy consumption, climate change adaptation , facilitate reduction of waste and to ensure high environmental standards are achieved.
SA4	Urban Fringe	To mitigate various impacts including ecological, surface water flood risk , water consumption, energy consumption, and climate change adaptation .
SA6	Sustainable Neighbourhoods	To mitigate various impacts including surface water flood risk and facilitate waste reduction.
CP1	Housing Delivery	To mitigate various impacts including ecological, surface water flood risk , water consumption, energy consumption, climate change adaptation and waste reduction .
CP3	Employment Land	To mitigate various impacts including, surface water flood risk , water consumption, energy consumption, climate change adaptation , waste reduction and ensure high environmental standards are achieved.
CP4	Retail	To mitigate various impacts including, ecological, surface water flood risk , water consumption, energy consumption, climate change adaptation , waste reduction and ensure high environmental standards are achieved.
CP6	Visitor Accommodation	To mitigate various impacts including, ecological, surface water flood risk , water consumption, energy consumption, climate change adaptation ,

Policy	Policy Name	SA referred to policy impacts being mitigated by CP8
		waste reduction and ensure high environmental standards are achieved.
CP14	Housing Density	To mitigate various impacts including, water consumption, energy consumption, climate change adaptation, waste reduction and ensure high environmental standards are achieved.
CP17	Sports Provision	To mitigate various impacts including ecological, surface water flood risk , water consumption, energy consumption, climate change adaptation , waste reduction and ensure high environmental standards are achieved.
CP20	Affordable Housing	To mitigate various impacts including ecological, surface water flood risk , water consumption, energy consumption, climate change adaptation and waste reduction.

The wider implications will be looked at further in the Cumulative Impacts section.

Section 6 Mitigation and Recommendations

Although overall the direction of the policy is still considered to be positive, some of the changes to Policy CP8 V.2 will result in less positive impacts against some of the environmental objectives than previous iterations. There is also some uncertainty as to whether some benefits will be delivered.

It is understood that the changes have been made in order to ensure the policy does not conflict with national requirements and that they cannot be avoided.

No additional recommendations have been put forward for further changes to V.2 of the policy at this stage.

Monitoring indicators will be in place to monitor the impacts of development in the city.

Section 7: Cumulative Impacts

The cumulative impacts have been re-assessed due to the changes to policy CP8 to ensure the impacts of the entire plan are considered together. The summary tables showing the cumulative impacts can be found in Appendix E.

Previously CP8 was cited as providing mitigation for the developmental impacts of numerous policies, such as helping to minimise flood risk and reducing energy and water consumption. The policy is still considered likely to provide a certain level of mitigation against some environmental issues, including energy and water consumption, although the reduction in standards required means that resource consumption in particular will be greater than with earlier versions of the policy. However, the policy's ability to provide mitigation for some of the other environmental issues has been compromised. In particular, this includes flood risk and climate change adaptation for all types of development, and also waste and ecology impacts for residential development, although some of these issues should be addressed by other citywide policies.

The changes to CP8 are therefore considered likely to have cumulative impacts. This is mainly due to the fact that CP8 is a cross cutting policy that affects what other policies will deliver, in terms of sustainable buildings and features. Although there will be positive impacts through implementation of CP8, the combination of changes means that it is no longer anticipated that there will be significant improvements in the sustainability of new developments with this version of the Plan. This will have wider implications including those associated with meeting targets to reduce the city's ecological footprint and those relating to reducing local/national carbon emissions.

Overall, the cumulative impacts of the City Plan as modified are considered to be:

Positive impacts:

- An increase in housing, including some affordable housing albeit at a level below the city's objectively assessed and affordable housing need, highlighting the ongoing need for discussions under the Duty to Co-operate.
- An increase in the amount of land for employment uses, having economic benefits.
- Overall improvements in the design and quality of new development.
- Improvements in access to services, through both increased provision and improvements in transport infrastructure
- Delivery of many of the wider determinants of health, including housing and employment opportunities, although it is recognised that some existing social issues associated with under-supply of housing are likely to continue

Adverse impacts are considered to be:

- Increase in traffic congestion and associated impacts including air quality and carbon emissions, with this likely to be more problematic in central areas and in the morning peak time.
- Increase in pressure between competing land uses, resulting in increased loss in greenfield sites, some of which perform an open space function, and associated

impacts such as visual impacts and other environmental impacts associated with the services these ecosystems provide, such as adapting to climate change.

- Increased consumption of water and the impact of this on the Brighton Chalk Aquifer.
- Increased consumption of energy, potentially compromising the city's ability to meet local targets relating to reducing the ecological footprint and national targets relating to reducing carbon emissions, as set by the Climate Change Act.
- Increased pressure on local amenities, particularly open space which will become more significant as the population increases.

Section 8: Monitoring

A revised monitoring table was set out in the Proposed Modifications Sustainability Appraisal (October 2014). This is in addition to the City Plan Monitoring & Implementation Plan.

The following table sets out the indicators which are of most relevance to policy CP8 and shows any changes in sustainability appraisal monitoring indicators with ~~strike through~~ for deletions and underline for additions.

SA Objective	Indicator
8) Minimise water use in all development	Domestic consumption of water (litre of water per day per household)
	Percentage of new development incorporating measures to reduce water consumption
18) To maximise sustainable energy use and mitigate climate change	KT of CO2 emitted from domestic sources for energy provision per capita
	Average annual domestic consumption of gas and electricity
	Average annual commercial and industrial consumption of gas and electricity
	Renewable energy generation
	<u>% of new residential development achieving the 19% carbon reduction improvement as required by BHCC</u>
20) To encourage new development to meet BREEAM standards	% of new non-residential development achieving minimum standards as required by BHCC.

Monitoring against these indicators will be help to determine the effects of implementing policy CP8.

Appendix A – CP8 Revised policy wording (v.2)

Nb: this version includes all modifications from Proposed Modifications, Further Modifications (July 2015) and Further Modifications (Sep 2015) where still relevant. Modifications applicable to this stage of modifications are shown in yellow highlight.

CP8 Sustainable Buildings

The council will ~~require~~ **seek that** all **new** development ~~to~~ incorporate sustainable design features to avoid expansion of the city’s ecological footprint, help deliver the principles of the One Planet approach, radical reductions in greenhouse gas emissions, particularly CO₂ emissions, and mitigate against and adapt to climate change.

Unless it can be demonstrated that doing so is not technically feasible and/or would make the scheme unviable:

1. All development will be required to achieve the minimum standards as set out below ~~or equivalent standards from a quality assured scheme~~ **unless superseded by national policy or legislation;**

Delete table:

NEW BUILD	Development size				Post 2016	Post 2019
	2013-2016					
	Non-major	Major	Greenfield	All	All	
Residential Code for Sustainable Homes	Level 4	Level 5		Level 6		
Non-residential BREEAM	Very Good	Excellent			Outstanding	
CONVERSIONS	Non-major (3-9 units) and Major					

Residential	BREEAM Very good
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Insert new table:

Residential (New build)		
Energy Performance	19% carbon reduction improvement against Part L 2013¹	
Water Performance	Water efficiency 'optional' standard²	
Non-residential	Development size	
	Non-major	Major and Greenfield
BREEAM	Very Good	Excellent

~~Standards may be updated in other DPD documents and/or a review of this policy.~~

2. All development proposals including conversions, extensions and changes of use **are required to will be expected to** demonstrate how the development:

- a. addresses climate change mitigation and adaptation;
- b. contributes to a reduction in the city's current level of greenhouse gas emissions by delivering significant reductions in fuel use and greenhouse gas emissions via: passive design and orientation; fabric performance; energy efficiency measures; and low carbon solutions;

- c. ~~incorporates~~ facilitates on-site low or zero carbon technologies, in particular renewable energy technologies³;
- d. connects, makes contributions to low and zero carbon energy schemes and/or incorporates provision to enable future connection to existing or potential decentralised energy schemes;
- d. aspires towards water neutrality⁴ by meeting high water efficiency standards and incorporating facilities to recycle, harvest and conserve water resources;
- e. improves the sustainability of existing buildings, makes the most effective use of land and re-uses existing buildings;
- f. protects occupant health and the wider environment by making the best use of site orientation, building form, layout, landscaping and materials to maximise natural light and heat, whilst avoiding internal overheating by providing passive cooling and ventilation;
- g. reduces 'heat island effect'⁵ and surface water run-off;
- h. uses materials that are sustainable and have low embodied carbon⁶;
- i. enhances biodiversity;
- j. minimises waste and facilitates recycling, composting and re-use;
- k. reduces air, land and water pollution and safeguards water supplies if development is within groundwater Source Protection Zones;
- l. maximises operational efficiency through ongoing evaluation, monitoring and improvement of building performance especially in relation to energy and water use;
- m. introduces means to encourage users, tenants and householders to reduce their ecological footprint;
- n. is adaptable to respond to changing needs; and
- o. encourages food growing.

~~When onsite sustainability standards cannot be met mitigation measures may be sought, including those in accordance with Policy CP7 Infrastructure and Developer Contributions and Allowable Solutions⁷ or a local offset mechanism using this approach.~~

Technical guidance and clarification will be produced to help planning applicants ~~meet the requirements of~~ address this policy.

The Sustainability Checklist and the Authority Monitoring Report (AMR) will be used to assess planning applications, and monitor the effectiveness of the policy ~~and inform the council of revised standards over the plan period.~~

Appendix B – Re-assessment of policy CP8 – Sustainable Buildings (v.1)

The following is applicable to all objectives:

The key policy wording has changed.

The policy no longer “requires” developments to incorporate sustainable design features but now “encourages” development to incorporate sustainable design features.

Within section 1, the policy no longer “requires” development to achieve minimum standards but now “expects” development to achieve minimum standards.

Within section 2, the policy no longer “requires” development to demonstrate how the development will address the various sustainability issues set out in points (a) to (o), but now “expects” development to address the issues.

The change in this policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits. This makes the impacts uncertain across all related objectives.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. The key policy wording has changed. It no longer “requires” developments to incorporate sustainable design features but now “encourages” development to incorporate sustainable design features. Within section 1, the policy no longer “requires” development to achieve minimum standards but now “expects” development to achieve minimum standards. Within section 2, the policy no longer “requires” development to demonstrate how the development will address the various sustainability issues set out in points (a) to (o), but now “expects” development to address the issues. These issues include (a) climate change mitigation, (g) reduces heat island effect, (i) enhances biodiversity, and (o) encourages food growing, all of which could have positive benefits for biodiversity if implemented. The changes in the policy wording are considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including biodiversity.</p> <p>The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period, with development no longer required to achieve “outstanding”, and now being expected to achieve either very good or excellent dependent on the size of the development. However, there is no difference in the minimum standards required across the very good, excellent and</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>outstanding rating levels for Ecology, and therefore this change alone is unlikely to have any significant impact on this objective.</p> <p>It is noted that the requirement for conversions to residential to meet BREEAM very good has been removed completely, however as there is no minimum standard required for ecology in the BREEAM refurbishment scheme, this alone won't impact on this objective.</p> <p>The requirement for residential development to meet various levels of the Code for Sustainable Homes was removed at Further Modification stage (July 2015). This was found to have an impact on this objective as residential development would previously have been required to address certain issues under the Ecology section. At the time, the SA found removal of this quality assurance check to change the impact from significantly positive to positive, however this was based on the other policy requirements still being in place and required.</p> <p>Now that the wording of the policy is less strong, with requirements now changed to expectations, this is considered to bring about more uncertainty around achieving biodiversity benefits. Therefore although impacts could still be positive, this is more uncertain.</p>			
2) Improve air quality	<p>Direct impact. As discussed under Objective 1, key policy wording has changed and development is no longer required to meet certain standards or demonstrate that certain sustainability issues are addressed, including 2. k – reduce air pollution, with these now only being an expectation. The changes in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including improving air quality.</p> <p>The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period. BREEAM includes sections on Transport and Pollution, however there are no mandatory minimum standards required to be achieved in either of these topic areas, and therefore this change is unlikely to have any significant impact on this objective. The same is found for the removal of the BREEAM standard for conversions.</p> <p>The requirement for residential development to meet various levels of the Code for</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>Sustainable Homes was removed at Further Modification stage (July 2015). At the time, the SA found that due to other policy requirements still being in place, that the impacts should still be positive. However now that the policy is less strong, with requirements now changed to expectations, there is more uncertainty around reducing pollution. Therefore impacts could be positive but are more uncertain.</p>			
3) Maintain local distinctiveness and sites	There is no direct link with this objective.			
4) Protect South Downs	There is no direct link with this objective.			
5) Provide decent, affordable housing	<p>Indirect impact. The SA has previously stated that the costs of building highly sustainable homes may conflict with the viability of providing housing, including affordable housing. The change in policy wording from “requires” to expects” could be beneficial towards this objective. It may help to bring forward development through potentially improving viability for developers by changing the requirement for additional sustainability benefits to be delivered.</p> <p>As the government has withdrawn the zero carbon homes and allowable solutions scheme, the policy no longer requires residential development to achieve zero carbon status from 2016. This means new houses only have to meet the 19% carbon reduction improvement which will significantly reduce the costs for developers. The government suggests that the removal of these standards will help to stimulate house-building. However, there has been no national study to confirm that the achievement of sustainability standards has contributed to lower levels of house-building, and therefore this potential for positive impact is considered to be uncertain.</p>		+?	+?
6) Reduce amount of car journeys	<p>Indirect impact. The policy itself has no specific reference to reducing car journeys. The BREEAM scheme includes a section on Transport. However, none of the points that could be achieved under the BREEAM Transport section are mandatory, and therefore the policy is not considered to have any impact on this objective.</p>			
7) Minimise risk of pollution to water	<p>Direct impact. As described under Objective 1, key policy wording has changed and development is no longer required to meet certain standards or demonstrate that certain sustainability issues are addressed. This policy now only “expects” development to demonstrate how it reduces water pollution and safeguards water supplies if within a groundwater Source Protection Zone, rather than requires it. The</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>change in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including those relating to water pollution.</p> <p>The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period. BREEAM includes sections on Pollution, which includes a credit for surface water run-off. However there are no mandatory minimum standards required to be achieved in this topic area, and therefore this change alone is unlikely to have any significant impact on this objective. The same is found for the removal of the BREEAM standard for conversions.</p> <p>The requirement for residential development to meet various levels of the Code for Sustainable Homes was removed at Further Modification stage (July 2015). The CSH included a mandatory requirement to manage surface water flood risk. At the time, the SA found that due to other policy requirements still being in place, that the impacts should still be significantly positive. However now that the policy is less strong, with requirements now changed to expectations, there is more uncertainty around delivery the potential for a significant positive impact is considered to be less likely and more uncertain.</p>			
8) Minimise use of water	<p>Direct impact.</p> <p>As described under Objective 1, key policy wording has changed and development is no longer required to meet certain standards or demonstrate that certain sustainability issues are addressed. This includes the “water efficiency optional standard of 110l/p/day”, which is now only expected to be achieved, and includes (2d) aspires towards water neutrality, again which is now only an expectation rather than a requirement. The changes in the policy wording are considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including water reduction.</p> <p>The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period, with development no longer required to achieve “outstanding”, and now being expected to achieve either “very good” or “excellent” dependent on the size of the development. This will have a direct impact on water consumption with lower standards in water reduction required to</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>achieve the very good or excellent ratings compared to the outstanding rating. Although the reference to meeting certain levels of the Code for Sustainable Homes was removed at the Further Modifications stage, a new optional standard for water was included. If the optional standard for water is implemented, this will help to ensure water usage in residential development does not exceed 110l/p/day as a minimum. This would be an improvement on the 2012/2013 local average metered consumption of 132l/p/day, however is lower than previous versions of the policy at Submission/Proposed Modifications stages. The need to minimise water consumption as much as possible of particular importance locally given the South East has been designated as a water stressed area. Locally, the target for the former CSH3 (105l/p/day) is routinely being achieved from new residential development. At Further Modifications stage, the SA found that due to other policy requirements still being in place, that the impacts should still be significantly positive. However now that the policy is less strong, with requirements now changed to expectations, the impact is not considered to be as significant. In addition, there is more uncertainty around whether benefits will be delivered. Therefore impacts could be positive, but are considered to be uncertain.</p>			
9) Promote development of contaminated land	<p>Direct impact. As discussed above, key policy wording has changed and development is no longer required to meet certain standards or demonstrate that certain sustainability issues are addressed, including (2k) – reduce land pollution, with this now only an expectation. The changes in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including reducing land pollution. The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period. BREEAM includes sections on Pollution, including contaminated land however there are no mandatory minimum standards required to be achieved in this topic areas, and therefore this change alone is unlikely to have any significant impact on this objective. The same is found for the removal of the BREEAM standard for conversions. Overall, the wording of the policy is less strong, with requirements now changed to expectations, and this is considered to bring about more uncertainty around achieving</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	benefits. Therefore impacts could be positive, but are uncertain.			
10) Manage coastal defences	There is no direct link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	There is no direct link to this objective.			
12) Support economic development	Indirect impact. As the government has withdrawn the zero carbon homes and allowable solutions scheme, the policy no longer requires residential development to achieve zero carbon status from 2016. This means new houses only have to meet the 19% carbon reduction improvement across all timescale and this will significantly reduce the costs for developers. The government suggests that the removal of these standards will help to stimulate house-building, which is strongly linked to economic growth. However, there has been no national study to confirm that the achievement of higher sustainability standards has contributed to lower levels of house-building, and therefore this potential for positive impact is considered to be highly uncertain.		+?	+?
13) Improve health	<p>Indirect impact. There are many ways in which the policy could have a positive impact on health, including through enhancements to biodiversity and encouragement of food growing which can improve health and well-being; through improvements to air quality; through consideration of health through site design; through protection of groundwater resources through reducing surface water run-off; and through minimising the wider health issues associated with climate change through potential reductions in carbon emissions. However, as discussed under all the previous objectives, the change in policy wording in Part 2 of the policy from “requires” to “expects” is considered to significantly compromise the policy’s ability to secure delivery of sustainability benefits including those that would benefit health.</p> <p>The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period. BREEAM includes a section on Health & Wellbeing, however there are no mandatory minimum standards required</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>to be achieved in this topic areas, and therefore this change alone is unlikely to have any significant impact on this objective. The BREEAM standard for conversions has been removed. This did include some mandatory credits for health and well-being (relating to ventilation and safety) and therefore removal of this requirement could have an impact on health.</p> <p>The removal of the requirement for residential development to meet zero carbon homes status will result in a reduction in the energy performance of new development in the post 2016 period compared to previous iterations of the policy. This may impact on fuel poverty which is strongly linked to health, with highly efficient homes clearly benefitting those that may be suffering from economic deprivation. However if energy performance set out in the policy is achieved, this should help result in lower fuel bills for new developments.</p> <p>The deletion of the Allowable Solutions scheme and text referring to securing developer contributions will directly impact upon any funding that could have been secured from new development that could be have been used to improve the energy efficiency of existing building stock. The deletion of this text could also have an impact on fuel poverty.</p> <p>Overall, although the policy could have positive impacts, the various changes to the policy are considered to reduce impact of the policy from significantly positive to positive across all timescales. However, as previously discussed, this is considered to be uncertain due to the change in the strength of the policy from “requires” to “expects”.</p>			
14) Integrate health and community safety	There is no direct link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	<p>Indirect impact.</p> <p>The removal of the requirement for residential development to meet zero carbon homes standards will result in a reduction in the energy performance of new development in the post 2016 period compared to previous iterations of the policy.</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>This may impact on fuel poverty, with highly efficient homes clearly benefitting those that may be suffering from economic deprivation. However if energy performance set out in the policy is achieved, this should help result in lower fuel bills for new developments. However, as discussed, the ability of the policy to secure the 19% carbon reduction has been significantly compromised through the change in policy wording from “requires” to “expects”.</p> <p>The deletion of the Allowable Solutions scheme and text referring to securing developer contributions as mitigation will directly impact upon any funding that could have been secured from new development, that could be have been used to improve the energy efficiency of existing building stock. The deletion of this text could therefore also have an indirect impact on fuel poverty of householders living in existing housing stock.</p> <p>Overall, the policy is still considered to have an indirect positive impact on deprivation, however is still considered to be uncertain due to the change in key policy wording.</p>			
16) Engage local communities	There is no direct link to this objective.			
17) Make the best of previously developed land	<p>Direct impact.</p> <p>As already discussed, key policy wording has changed and development is no longer required to meet certain standards or demonstrate that certain sustainability issues are addressed, including (2e) “makes the most effective use of land and re-uses existing buildings”, with this now only being an expectation and not a requirement. The changes in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits.</p> <p>The impacts could be positive, but are uncertain and will depend largely upon the goodwill of developers, although it could be assumed that it is a developer’s interest to make the most efficient and effective use of land.</p>	+?	+?	+?
18) Maximise sustainable	There are three main ways in which the policy has been amended that are considered	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
energy and mitigate the impacts of climate change.	<p>to impact on this objective. 1) Change in policy wording from “requires” to “expects”; 2) Removal of the Zero Carbon Homes standard for residential development plus allowable solutions/mitigation; 3) Change in BREEAM standards for non-residential development.</p> <p>1) Change in wording: The key policy wording has changed. It no longer “requires” developments to incorporate sustainable design features but now “encourages” development to incorporate sustainable design features. Within section 1, the policy no longer “requires” development to achieve minimum standards but now “expects” development to achieve minimum standards. Within section 2, the policy no longer “requires” development to demonstrate how the development will address the various sustainability issues set out in points (a) to (o), but now “expects” development to address the issues.</p> <p>There are many aspect of the policy which are likely to be affected by this: (2a) addressing climate change mitigation; (2b) delivering reductions in CO2 emissions, (2b) being energy efficient , (2c) facilitation of low or zero carbon technology, (2d) connection or contribute to low/zero carbon energy schemes. All of these policy requirements are considered to have positive impacts towards this objective, however it is difficult to know whether these policy expectations will be delivered when they are no longer a formal requirement. The change in wording also impacts on the achievement of minimum standards, which are no longer a formal requirement but again are an expectation.</p> <p>The change in this policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits.</p> <p>2) Removal of Zero Carbon Homes & Allowable Solutions scheme The policy now expects residential development to achieve a 19% carbon reduction improvement against Part L 2013 across all timescales. This is known to be equivalent to the former CSH4 standards for energy efficiency. There is no longer any zero carbon homes target for post 2016/2019 meaning that, if delivered, residential</p>			

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>development will only achieve the 19% carbon reduction improvement compared to the potential for 100% in this period as in previous iterations. The Allowable Solutions scheme provided a mechanism for the potential pooling of money which could then have been used to improve the energy efficiency of existing housing stock. This Energy Study 2012 concluded that improvements to the existing building stock would be required for the city to meet its CO2 reduction targets. The removal of the Allowable Solutions scheme combined with the lowering of energy standards will therefore lead to an increase in the energy consumed, as well as removes the potential for improving existing stock and will have implications on the city's ability to meet CO2 reduction targets. As discussed above, the change in wording from "requires" to "expects" is found to compromise the implementation of the policy.</p> <p>3) Change in BREEAM standards The standards "expected" for non-residential development have reduced from "outstanding" for all development in the post 2019 period to either "very good" for non-major or "excellent" for major. Minimum standards required for BREEAM include two issues relating to energy performance, including (i) reduction of energy use and carbon emissions, and (ii) energy monitoring. There is no difference between the minimum standards required for energy monitoring between either very good, excellent or outstanding. However there is a difference in the reduction of energy use required between the three standards, with "very good" not having to achieve a credit in this issue in order to achieve the standard. The Excellent standard would require 5 credits to be achieved for this issue and Outstanding would have required 8 credits to be achieved in order to meet the standard. The reduction in standards now expected will therefore impact on the energy consumed and carbon emissions associated with both non-major and major development.</p> <p>In addition, there are no longer any BREEAM requirements for residential conversions, and there are no standards applicable to residential conversions. This will impact upon the energy performance of these developments, and the carbon emissions associated with development which has made up an average of 34% of total housing completions in the city in the last 5 year period.</p>			

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>Overall, the policy still “expects” certain standards to be achieved and “expects” development to deliver certain benefits, and this should result in positive impacts for this objective. However, the strength of the policy is considered to be weakened by these changes and the ability to secure sustainability benefits compromised, and therefore the impact is also considered to be uncertain.</p>			
19) Taking account of the changing climate	<p>Direct impact. The policy could have a positive impact on this objective, as the policy “expects” developments to demonstrate how they will address climate change adaptation, use sustainable materials, and reduce issues that may become more present with climate change, such as reducing the heat island effect and surface water run-off. However, the change in policy wording, as discussed in length in other objectives means it is no longer a formal requirement and therefore the ability of the policy to secure these benefits is comprised and therefore uncertain.</p>	+?	+?	+?
20) Meet BREEAM / Code for Sustainable Homes	<p><i>The reference to Code for Sustainable Homes was removed from the policy at Further Proposed Modifications stage (July 2015) to reflect change in national policy requirements. This objective is now therefore only considered to be applicable towards meeting BREEAM standards.</i></p> <p>Direct impact. The change in policy wording now means that development is only expected to achieve the standards rather than required. This is considered to weaken the policy and comprises the ability of the policy to secure standards and makes the impact of the policy uncertain.</p> <p>In addition, the standards “expected” for non-residential development have reduced from “outstanding” for all development in the post 2019 period to either “very good” for non-major or “excellent” for major. This will have an impact on many issues addressed through the BREEAM scheme and is considered to reduce the previous score of significantly positive in the medium and long term to just positive across all timescale.</p> <p>Overall, the impacts are considered to be positive uncertain across all timescales.</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
21) Increasing accessibility	There is no link with this objective.			
22) Reduction of waste	<p>Direct impact.</p> <p>The change in policy wording means that development is no longer “required” to demonstrate how they will minimise waste and facilitate recycling, but is now “expected” to demonstrate this. This could have a positive impact on this objective, but as described throughout this appraisal, is considered to make the impact more uncertain based on the reduced strength of the policy.</p> <p>Waste is one of the issues which must be addressed through BREEAM, which includes construction waste associated with development at construction stage and operational waste. However only development achieving outstanding was required to meet mandatory minimum standards in both these aspects; development achieving excellent is only required to meet mandatory minimum standards in operational waste, and neither of the aspects are mandatory in order to achieve the “very good” standard. This could therefore lead to an increase in waste associated with non-residential development compared to previous iterations of the policy.</p> <p>The former removal of the requirement for residential development to meet certain levels of Code for Sustainable Homes was also found to have impact on this objective as one of the categories under CSH covers the issue of waste.</p>	+?	+?	+?

Appendix C – Re-assessment of policy CP8 – Sustainable Buildings (v.2)

Revisions in assessment between V1 and V2 highlighted in bold.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. Within section 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard, which includes a mandatory credit for ecology. The BREEAM standards that are expected to be achieved by non-residential development have also changed in the post 2019 period, with development no longer required to achieve “outstanding”, and now being expected to achieve either very good or excellent dependent on the size of the development. However, there is no difference in the minimum standards required across the very good, excellent and outstanding rating levels for Ecology, and therefore this change alone is unlikely to have any impact on this objective.</p> <p>The requirement for conversions to residential to meet BREEAM very good has been removed completely, however as there is no minimum standard required for ecology in the BREEAM refurbishment scheme, this alone won’t impact on this objective.</p> <p>The requirement for residential development to meet various levels of the Code for Sustainable Homes was removed at Further Modification stage (July 2015). This was found to have an impact on this objective as residential development would previously have been required to address certain issues under the Ecology section. At the time, the SA found removal of this quality assurance check to change the impact from significantly positive to positive.</p> <p>Within section 2, the policy still no longer “requires” development to demonstrate how the development will address the various sustainability issues set out in points (a) to (o), but now “expects” development to address the issues. These issues include (a) climate change mitigation, (g) reduces heat island effect, (i) enhances biodiversity, and (o) encourages food growing, all of which could have positive benefits for biodiversity if implemented. This change in the policy wording is considered to weaken the policy however overall, the impact should be positive due to the requirement to meet BREEAM standards,</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	although is not considered to be significant.			
2) Improve air quality	<p>Direct impact. Within section 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard. BREEAM includes sections on Transport and Pollution, however there are no mandatory credits required to be achieved in either of these topic areas and therefore the policy requirement in Part 1 is unlikely to bring about positive impacts for this objective.</p> <p>Within Part 2, the policy still no longer requires development to demonstrate that certain sustainability issues are addressed, including 2. k – reduce air pollution, with these now only being an expectation. The changes in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including improving air quality.</p> <p>The requirement for residential development to meet various levels of the Code for Sustainable Homes was removed at Further Modification stage (July 2015). At the time, the SA found that due to other policy requirements still being in place, that the impacts should still be positive. However now that the policy is less strong, with certain requirements now changed to expectations, there is more uncertainty around reducing pollution. Therefore impacts could be positive but are more uncertain.</p>	+?	+?	+?
3) Maintain local distinctiveness and sites	There is no direct link with this objective.			
4) Protect South Downs	There is no direct link with this objective.			
5) Provide decent, affordable housing	<p>Indirect impact. The SA has previously stated that the costs of building highly sustainable homes may conflict with the viability of providing housing, including affordable housing. The change in policy wording from “requires” to expects” in Part 2 could be beneficial towards this objective. It may help to bring forward development through potentially improving viability for developers by changing the requirement for additional sustainability benefits to be delivered.</p> <p>As the government has withdrawn the zero carbon homes and allowable solutions scheme, the policy no longer requires residential development to achieve zero carbon status from 2016. This means new houses only have to meet the 19% carbon reduction improvement which will significantly reduce the costs for developers. The government suggests that the</p>		+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	removal of these standards will help to stimulate house-building. However, there has been no national study to confirm that the achievement of sustainability standards has contributed to lower levels of house-building, and therefore this potential for positive impact is considered to be uncertain.			
6) Reduce amount of car journeys	Indirect impact. The policy itself has no specific reference to reducing car journeys. The BREEAM scheme includes a section on Transport. However, none of the points that could be achieved under the BREEAM Transport section are mandatory, and therefore the policy is not considered to have any impact on this objective.			
7) Minimise risk of pollution to water	<p>Direct impact. Within section 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard. BREEAM includes sections on Pollution, however there are no mandatory credits required to be achieved for Pollution and therefore the policy requirement in Part 1 is unlikely to bring about positive impacts for this objective. The removal of the BREEAM standard for conversions is not considered to have any impact on this objective, as does not include any mandatory credits for this topic.</p> <p>Within Part 2, the policy is still only “expected” to demonstrate how certain sustainability issues are addresses, which includes how it reduces water pollution and safeguards water supplies if within a groundwater Source Protection Zone. The change in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including those relating to water pollution.</p> <p>The requirement for residential development to meet various levels of the Code for Sustainable Homes was removed at Further Modification stage (July 2015). The CSH included a mandatory requirement to manage surface water flood risk. At the time, the SA found that due to other policy requirements still being in place, that the impacts should still be significantly positive. However now that the policy is less strong, with requirements in Part 2 now changed to expectations, there is more uncertainty around delivery and the potential for a significant positive impact is considered to be less likely and more uncertain.</p>	+?	+?	+?
8) Minimise use of water	Direct impact.	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>Within Part 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard, which includes a mandatory credits for water consumption. Residential development is now also required to meet the “water efficiency optional standard of 110l/p/day”. These requirements should have positive impacts for this objective.</p> <p>The change in BREEAM standards that are required by non-residential development have changed in the post 2019 period, with development no longer required to achieve “outstanding”, and now being required to achieve either “very good” or “excellent” dependent on the size of the development. This will have a direct impact on water consumption with lower standards in water reduction required to achieve the very good or excellent ratings compared to the outstanding rating.</p> <p>Within Part 2 of the policy, development is still only expected to demonstrate that certain sustainability issues are addressed. This includes (2d) aspires towards water neutrality, again which is now only an expectation rather than a requirement. The changes in the policy wording are considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including water reduction.</p> <p>Although the reference to meeting certain levels of the Code for Sustainable Homes was removed at the Further Modifications stage, a new optional standard for water was included. If the optional standard for water is implemented, this will help to ensure water usage in residential development does not exceed 110l/p/day as a minimum. This would be an improvement on the 2012/2013 local average metered consumption of 132l/p/day, however is lower than previous versions of the policy at Submission/Proposed Modifications stages. The need to minimise water consumption as much as possible of particular importance locally given the South East has been designated as a water stressed area. Locally, the target for the former CSH3 (105l/p/day) is routinely being achieved from new residential development. At Further Modifications stage, the SA found that due to other policy requirements still being in place, that the impacts should still be significantly positive. However now that the policy requirements in Part 1 are less strong, and the requirements in Part 2 have been changed to expectations, the impact is not considered to be as significant.</p>			
9) Promote development of	Direct impact.	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
contaminated land	<p>Within section 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard. BREEAM includes sections on Pollution, including contaminated land, however there are no mandatory credits required to be achieved for Pollution and therefore the policy requirement in Part 1 is unlikely to bring about positive impacts for this objective.</p> <p>The removal of the BREEAM standard for conversions is not considered to have any impact on this objective, as does not include any mandatory credits for this topic.</p> <p>Within Part 2, the policy is still only “expected” to demonstrate that certain sustainability issues are addressed, including (2k) – reduce land pollution, with this now only an expectation. This change in the policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits including reducing land pollution.</p> <p>The requirement for residential development to meet various levels of the Code for Sustainable Homes was removed at Further Modification stage (July 2015). The CSH included a mandatory requirement to manage surface water flood risk. At the time, the SA found that due to other policy requirements still being in place, that the impacts should still be significantly positive. However now that the policy is less strong, with requirements in Part 2 now changed to expectations, there is more uncertainty around delivery and the potential for a significant positive impact is considered to be less likely and more uncertain</p>			
10) Manage coastal defences	There is no direct link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	There is no direct link to this objective.			
12) Support economic development	Indirect impact. As the government has withdrawn the zero carbon homes and allowable solutions scheme, the policy no longer requires residential development to achieve zero carbon status from 2016. This means new houses only have to meet the 19% carbon reduction improvement across all timescale and this will significantly reduce the costs for developers. The government suggests that the removal of these standards will help to stimulate house-building, which is strongly linked to economic growth. However, there has		+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	been no national study to confirm that the achievement of higher sustainability standards has contributed to lower levels of house-building, and therefore this potential for positive impact is considered to be highly uncertain.			
13) Improve health	<p>Indirect impact.</p> <p>There are many ways in which the policy could have a positive impact on health, including through enhancements to biodiversity and encouragement of food growing which can improve health and well-being; through improvements to air quality; through consideration of health through site design; through protection of groundwater resources through reducing surface water run-off; and through minimising the wider health issues associated with climate change through potential reductions in carbon emissions. However, as discussed under all the previous objectives, the change in policy wording in Part 2 of the policy from “requires” to “expects” is considered to significantly compromise the policy’s ability to secure delivery of sustainability benefits including those that would benefit health.</p> <p>Within section 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard. BREEAM includes a section on Health & Wellbeing, however there are no mandatory minimum standards required to be achieved in this topic area, and therefore the policy requirement in Part 1 is unlikely to bring about positive impacts for this objective. The BREEAM standard for conversions has been removed. This did include some mandatory credits for health and well-being (relating to ventilation and safety) and therefore removal of this requirement could have an impact on health.</p> <p>The removal of the requirement for residential development to meet zero carbon homes status will result in a reduction in the energy performance of new development in the post 2016 period compared to previous iterations of the policy. This may impact on fuel poverty which is strongly linked to health, with highly efficient homes clearly benefitting those that may be suffering from economic deprivation. However if energy performance set out in the policy is achieved, this should help result in lower fuel bills for new developments.</p> <p>The deletion of the Allowable Solutions scheme and text referring to securing developer contributions will directly impact upon any funding that could have been secured from new development that could be have been used to improve the energy efficiency of existing</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>building stock. The deletion of this text could also have an impact on fuel poverty. Overall, although the policy could have positive impacts, the various changes to the policy are considered to reduce impact of the policy from significantly positive to positive across all timescales. However, as previously discussed, this is considered to be uncertain due to the change in the policy in Part 2 from “requires” to “expects”.</p>			
14) Integrate health and community safety	There is no direct link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	<p>Indirect impact. The removal of the requirement for residential development to meet zero carbon homes standards will result in a reduction in the energy performance of new development in the post 2016 period compared to previous iterations of the policy. This may impact on fuel poverty, with highly efficient homes clearly benefitting those that may be suffering from economic deprivation. However if energy performance set out in the policy is achieved, this should help result in lower fuel bills for new developments.</p> <p>The deletion of the Allowable Solutions scheme and text referring to securing developer contributions as mitigation will directly impact upon any funding that could have been secured from new development, that could be have been used to improve the energy efficiency of existing building stock. The deletion of this text could therefore also have an indirect impact on fuel poverty of householders living in existing housing stock.</p> <p>Overall, the policy is still considered to have an indirect positive impact on deprivation, however is still considered to be uncertain due to the change in key policy wording and reduction in energy efficiency in the longer term.</p>	+?	+?	+?
16) Engage local communities	There is no direct link to this objective.			
17) Make the best of previously developed land	<p>Direct impact. As already discussed, key policy wording has changed and development is no longer required to demonstrate that certain sustainability issues are addressed, including (2e) “makes the most effective use of land and re-uses existing buildings”, with this now only being an expectation and not a requirement. The changes in the policy wording is considered</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits.</p> <p>The impacts could be positive, but are uncertain, although it could be assumed that it is a developer's interest to make the most efficient and effective use of land.</p>			
<p>18) Maximise sustainable energy and mitigate the impacts of climate change.</p>	<p>There are three main ways in which the policy has been amended that are considered to impact on this objective. 1) Change in policy wording from “requires” to “expects” in Part 2; 2) Removal of the Zero Carbon Homes standard for residential development plus allowable solutions/mitigation; 3) Change in BREEAM standards for non-residential development.</p> <p>1). Change in wording:</p> <p>Within section 2, the policy still no longer “requires” development to demonstrate how the development will address the various sustainability issues set out in points (a) to (o), but now “expects” development to address the issues. There are many aspect of the policy which are likely to be affected by this: (2a) addressing climate change mitigation; (2b) delivering reductions in CO2 emissions, (2b) being energy efficient , (2c) facilitation of low or zero carbon technology, (2d) connection or contribute to low/zero carbon energy schemes. All of these policy requirements are considered to have positive impacts towards this objective, however it is difficult to know whether these policy expectations will be delivered when they are no longer a formal requirement. The change in this policy wording is considered to weaken the policy and somewhat compromises the ability of the policy to ensure delivery of various sustainability benefits. However, the requirement to for residential and non-residential development to meet certain standards should now bring about a minor positive impact for this objective.</p> <p>2. Removal of Zero Carbon Homes & Allowable Solutions scheme</p> <p>The policy now requires residential development to achieve a 19% carbon reduction improvement against Part L 2013 across all timescales. This is known to be equivalent to the former CSH4 standards for energy efficiency. There is no longer any zero carbon homes target for post 2016/2019 meaning that, if delivered, residential development will only achieve the 19% carbon reduction improvement compared to the potential for 100% in this period as in previous iterations and this reduces the potential for significant positive impact in the long term. The Allowable Solutions scheme provided a mechanism for the potential pooling of</p>	<p style="text-align: center;">+</p>	<p style="text-align: center;">+</p>	<p style="text-align: center;">+</p>

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>money which could then have been used to improve the energy efficiency of existing housing stock. This Energy Study 2012 concluded that improvements to the existing building stock would be required for the city to meet its CO2 reduction targets. The removal of the Allowable Solutions scheme combined with the lowering of energy standards will therefore lead to an increase in the energy consumed, as well as removes the potential for improving existing stock and will have implications on the city's ability to meet CO2 reduction targets.</p> <p>3. Change in BREEAM standards Development is now required to meet certain standards, however the standards for non-residential development have reduced from “outstanding” for all development in the post 2019 period to either “very good” for non-major or “excellent” for major. Minimum mandatory credits required for BREEAM include two issues relating to energy performance, including (i) reduction of energy use and carbon emissions, and (ii) energy monitoring. There is no difference between the minimum standards required for energy monitoring between either very good, excellent or outstanding. However there is a difference in the reduction of energy use required between the three standards, with “very good” not having to achieve a credit in this issue in order to achieve the standard. The Excellent standard would require 5 credits to be achieved for this issue and Outstanding would have required 8 credits to be achieved in order to meet the standard. The reduction in standards now expected will therefore impact on the energy consumed and carbon emissions associated with both non-major and major development.</p> <p>In addition, there are no longer any BREEAM requirements for residential conversions, and there are no standards applicable to residential conversions. This will impact upon the energy performance of these developments, and the carbon emissions associated with development which has made up an average of 34% of total housing completions in the city in the last 5 year period.</p> <p>Overall, the policy requirements set out in Part 1 should results in positive impacts for this objective, however these are no longer anticipated to be significant.</p>			
19) Taking account of the	Direct impact.	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
changing climate	The policy could have a positive impact on this objective, as the policy “expects” developments to demonstrate how they will address climate change adaptation, use sustainable materials, and reduce issues that may become more present with climate change, such as reducing the heat island effect and surface water run-off. However, the change in policy wording, means it is no longer a formal requirement and therefore the ability of the policy to secure these benefits is comprised and therefore uncertain.			
20) Meet BREEAM / Code for Sustainable Homes	<p><i>The reference to Code for Sustainable Homes was removed from the policy at Further Proposed Modifications stage (July 2015) to reflect change in national policy requirements. This objective is now therefore only considered to be applicable towards meeting BREEAM standards.</i></p> <p>Direct impact. The policy now requires development to achieve certain standards, including the BREEAM for non-residential development, and this should bring about positive impacts for this objective.</p> <p>However, the standards for non-residential development have reduced from “outstanding” for all development in the post 2019 period to either “very good” for non-major or “excellent” for major. This will have an impact on many issues addressed through the BREEAM scheme and is considered to reduce the previous score of significantly positive in the medium and long term to just positive across all timescale.</p>	+	+	+
21) Increasing accessibility	There is no link with this objective.			
22) Reduction of waste	<p>Direct impact. Within section 1, the policy now requires development to achieve minimum standards again. This includes non-residential development to achieve either very good or excellent BREEAM standard, which includes a mandatory credit for waste. This should therefore bring about positive impacts for this objective.</p> <p>Although waste is one of the issues which must be addressed through BREEAM, which includes construction waste associated with development at construction stage and operational waste, only development achieving outstanding is required to meet mandatory minimum standards in both these aspects. Development achieving excellent is only required to meet mandatory minimum standards in operational waste, and neither of the aspects are mandatory in order to achieve the “very good”</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>standard. This could therefore lead to an increase in waste associated with non-residential development compared to previous iterations of the policy.</p> <p>The former removal of the requirement for residential development to meet certain levels of Code for Sustainable Homes was also found to have impact on this objective as one of the categories under CSH covers the issue of waste.</p> <p>The change in policy wording in Part 2 means that development is no longer “required” to demonstrate how they will minimise waste and facilitate recycling, but is now “expected” to demonstrate this.</p> <p>Overall, the impacts are considered to be positive, although it is recognised that they are unlikely to be as positive as earlier iterations of the policy.</p>			

Appendix D – Selection/Rejection of Alternatives

CP8 Sustainable Buildings		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PRE1) To require developments to achieve highest standards of sustainable building design.	PO 2006	Selected. This option was found to have positive impacts against the environmental objectives although it was recognised that there may be additional costs of meeting high standards.
CP1 Option 1) To require all new development to deliver levels of building standards in advance of those set out nationally in order to avoid expansion of the city's ecological footprint and to mitigate against climate change.	RPO 2008	Selected. This option was found to have positive impacts against all of the environmental objectives. It was found to have mixed impacts against the housing objective as could impact on the viability of building affordable homes.
CP1 Option 2) Business as usual.	RPO 2008	Rejected. This option could result in standards being applied that do not reflect the distinctive local circumstances. This was found to result in mixed impacts against some of the social and environmental objectives.
CP1 Preferred Policy Approach, building on RPO Option 1 above, and incorporating stronger wording that requires development to achieve certain standards.	SUB 2010	The policy has strong positive impacts on the objectives relating to biodiversity, water reduction, health, energy consumption and meeting high building standards. Other positive impacts also anticipated. Adverse impacts identified against the housing objective due to the conflict between building highly sustainable and affordable homes.
CP8 Preferred Policy Approach building on SUB 2010 above.	DCP 2012	Impacts as described under SUB 2010 above.
CP8 Preferred Policy approach, building on DCP 2012 however deferring the requirements of meeting higher standards to later on in the plan period.	SUB 2013	Impacts as described under SUB 2010/DCP 2012 above for the medium and long term, although less significantly positive against some objectives in the shorter term due to relaxation in standards required to be achieved. Adverse impacts still anticipated against the housing objective, however the policy allows viability of a scheme to be a consideration.
CP8 Preferred Policy Approach,	PM 2014	Impacts mainly as described under SUB 2013. Impacts considered to be significantly

<p>building on SUB 2013, however reducing the environmental building standards required for residential development across all timescale and removing any difference for residential development on Greenfield sites to achieve higher standards than those on PDL. Further requirements added relating to development being required to reduce land pollution, and added protection for groundwater protection zones.</p>		<p>positive across relevant objectives, including those relating to water and energy minimisation, and meeting building standards despite the change in policy. Relaxation of building standards required to be achieved impacts positively on viability and the housing objective, which is a change from the previous position. Additional requirements relating to land pollution and protection of groundwater impact positively on relevant objectives.</p>
<p>Amended Policy Approach, removing references to Code for Sustainable Homes, replacing them with a standard for energy performance and water efficiency for residential development. Reference to the future exemption from Allowable Solutions added. Changes to bring policy in accordance with national policy.</p>	<p>FM July 2015</p>	<p>Amended policy not as strong as previous version on some SA objectives, namely biodiversity (1), water minimisation (8) and energy consumption (18) in the long term due to removal of Code for Sustainable Homes standards and reference to the introduction of exemption from Allowable Solutions from small sites. The exemption from Allowable Solutions also impacts on the objective for reducing deprivation, making this more uncertain, due to the impact this could have on enabling the energy efficiency improvements on existing housing stock and subsequent reductions in fuel poverty. Conversely, the exemption from Allowable Solutions was found to have a minor positive impact on both the housing and economic development objective, which is an improvement from the previous iteration, although was considered to be fairly uncertain and will depend on implementation. All other impacts remain the same as the previous iteration including positive impacts on air pollution, reducing car journeys, minimising water pollution, promoting development of contaminated land, improving health, promoting development of previously developed land, meeting BREEAM, and reducing waste, however it is noted that implementing the policy may be compromised without the requirement to meet Code for Sustainable Homes and the quality assurance system this involved.</p>

<p>V1. Amended Policy: change in policy wording with removal of “requires” and replacement with “expects in both Part 1 and Part 2 of the policy; deletion of zero carbon homes standards and allowable solutions scheme; deletion of standards for residential conversions; reduction in standards for non-residential development.</p>	<p>FPM Sep 2015 (v1)</p>	<p>The amended policy is not considered to be as strong as previous iterations due to the removal of the “requirement” for certain standards or sustainability benefits to be delivered. This has resulted in an uncertain impact across all relevant objectives. The policy still has numerous references which could result in positive impacts, albeit now uncertain, for various objectives including those relating to biodiversity, air quality, water pollution, water consumption, contaminated land, health, deprivation, previously developed land, sustainable energy & climate change mitigation, adapting to climate change, meeting BREEAM, and reducing waste.</p> <p>In addition, the changes could have beneficial impacts for objectives relating to the delivery of housing and economic development, with the government indicating that removal of requirements should stimulate house-building, however this is also considered to be uncertain.</p> <p>The policy is no longer anticipated to result in any significant positive impacts, due to the change in policy wording as described above. The policy could still have the ability to result in positive impacts for some relevant objectives, however this is considered to be uncertain. There are no adverse impacts associated with this policy.</p> <p>Although this policy is not considered to be sustainable as former iterations, the changes have taken place in order to ensure it is compliant with national policy and therefore cannot be avoided.</p>
<p>V2. Amended Policy: policy now requires development to meet certain standards, as per earlier versions; change in policy wording with removal of “requires” and replacement with “expects in Part 2 of the policy; deletion of zero carbon homes standards and allowable solutions scheme; deletion of standards for residential conversions; reduction in standards for non-residential</p>	<p>FPM Sep 2015 (v2)</p>	<p>This version of policy requires certain standards to be met, and this is considered to have positive impacts for objectives relating to biodiversity, water consumption, energy consumption and the reduction of waste, due to these topics requiring mandatory credits under the BREEAM scheme. In addition, residential development is also required to meet certain standards which should have positive impacts for water and energy consumption reduction. However it is noted that the change in requirements from earlier iterations will mean that both water and energy reduction will not be as great as with previous versions, meaning that the policy is not anticipated to have significant positive impacts for these objectives.</p> <p>The amended policy is not considered to be as strong as previous iterations for some of the other environmental objectives due to the removal of the “requirement” in Part 2 of the policy to demonstrate certain sustainability benefits. The policy still has numerous references in Part 2 which could result in positive impacts, however are now considered</p>

development.		<p>to be uncertain for objectives relating to air quality, water pollution, contaminated land, previously developed land, and climate change adaption. The BREEAM standard does not include any mandatory credits for any of these topic areas. In addition, this change in wording along with the removal of the requirement to meet zero carbon homes standards and references to the Allowable Solutions scheme reduces the policy's ability to contribute towards reducing fuel poverty, impacting on the health and deprivation objectives.</p> <p>The changes could have beneficial impacts for objectives relating to the delivery of housing and economic development, with the government indicating that removal of requirements should stimulate house-building, however this is also considered to be uncertain.</p> <p>There are no adverse impacts associated with this policy</p>
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Appendix E – Cumulative Impacts

The following tables show the likely long term impacts of the area based policies and the citywide policies on each of the sustainability appraisal objectives in the long term. Impacts for policies that have changed since the **Further Modifications (July 2015)** version are shown in **bold** font. This applies to CP8 only. It should be noted that the results for policy CP20 Affordable Housing are those relating to the policy at Submission stage, due to the revocation of the Written Ministerial Statement which removed the potential to secure contributions on sites providing less than 10 units, which was assessed at Further Modifications stage (July 2015).

Table E1 Area based policies

		Sustainability Objectives																					
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/GSH	21 Accessibility	22 Waste
Area Based Policies	DA1	+	-	+			-	+	-	+		++	++	-/+	+	+	+	+	+	-	+	-	
	DA2	-/+	--	-/?	?	++	--	-	-	+	--	++	++	-/+	+	+	+	+	+	+	--	-	++
	DA3	+	-	-/+	+	++	--	-/+	-	+		++	++	-/+	+	+	+	-/++	+	-/+	-/+	++	-
	DA4	+	--	-/+		++	--	-	-	+		++	++	-/+	+	+	+	+	++	++	-	-	++
	DA5	+	-	-/+		++	-	-	-	+		++	++	-/+	+	+	+	++	++	++	-/+	-	++
	DA6	+	-	+		++	-	+	-	+		++?	++?	-/+	+	+	+	++	+	-/+	-	++	-
	DA7	-?	-	+	+	++	--	+	+	?		+	+	+	+	+	+	-	+	+	+	+	-
	DA8	-?	-	+	?	++	-	-/+	-	+	--	++	++	-/+	+	+	+	++	++	++	--	-	+
	SA1	-/+	-/+	++	+	++	-/+	+	-	?	+	+	+	++	+	+		+	+	+	-	+	-
	SA2	+	-/+	++		+	-	-	-			++	++	-/+	+				++	-	-	+	-
	SA3	++	++	++			++	+	-			+	+	++	++	+	++	+	+	+	+	-	++
	SA4	-/+?	+	-/+?	-/+?	+	-/+?	-/+?	-	+		+	+	-/+?		-/+?	+		-	-/+		-/+?	
	SA5	+	+	++	++		+	+				+	+	+			+					+	-
	SA6	+	+	+		+	+	-	+	?		+	+	++	+	++	++	+	+	+	+	++	-

Table E2 Citywide policies

		Sustainability Objectives																					
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/GSH	21 Accessibility	22 Waste
Citywide Policy	CP1	-?	--	--?	-?	++	--	--	-	?	-	+	+	-/+	+	-/+?	+	+	+	--	-	-/+	-
	CP2		-			++	-					++	++	+		+		+	+			+	
	CP3	-	-	-/+	-?	+	-/+	-	-/+	+	-	++?	++?	+	+	+		+	+	-	-	+	+
	CP4	-	-	+		-	-	-	-			++	++	+		+			+	-	-	++	-
	CP5		-/+	+	+		-/+		+			++	++						+	+	+	+	-
	CP6	-	+	+	+	+	+	-	-			++	++					+	+	-	-		-
	CP7	+	+	+	+	+	+	+	+		+	+	+	++	+	++			+	+		+	+
	CP8	+	+			+		+	+	+			+	+		+		+	+	+	+	+	+
	CP9	?	+	?	?		+	?				+	+	+	+	+	+			?		++	
	CP10	++	+	+	++			++			+			+				+		++			
	CP11	-/+		+				++			++	+	+	+	+					++		+	
	CP12	+	+	++	++		+					+	+	+	++	+		++		+	+	++	
	CP13	++	++	++			++					+	+	++	+	+	+	+		+	-	++	+
	CP14	+	-	-/+	+	++	-	-	-		+	+	+	++	+	+		++	+	-	-	+	-
	CP15			++	+				+			++	++				+			+			
	CP16	-	+	-/+	-?	+	+	-			+	+		++	+	-/+					-/+		-/+
	CP17		+	+		+	+	-				+		++	+	++	+	+					+
	CP18	+	+	+			+							++	+	++	+						++
	CP19					++						+	+	++		+		+					
	CP20	-	-	-		++	-	-	-		-	+	+	++	+	+	+	+	+	-	-	+	-
	CP21	+	-/+	++	-/+?	++	-/+	+	-	+	+	+	+	+	+	+	+	+	+	-	+	+	-
	CP22	+		+	+	+		+						++	+		+			+		++	



**Brighton & Hove
City Council**

Brighton & Hove Submission City Plan Part One

Further Proposed Modifications

June 2015

Sustainability Appraisal Addendum



Brighton & Hove
City Council

Sustainability Appraisal Addendum

Further Proposed Modifications June 2015

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Section 1 Introduction

Background

Brighton & Hove City Council began the preparation of the City Plan Part 1 Development Plan Document (DPD) in October 2011 which followed on from work to progress its Core Strategy that commenced in 2005. As part of this process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken (hereinafter referred to as SA).

A SA Report has been produced at various stages throughout the development of the Core Strategy/City Plan, including the SA of the Submission City Plan in February 2013, documenting the SA process and the assessment results up to that point.

Brighton & Hove City Council submitted the City Plan Part 1 in June 2013. The Examination in Public on the Submission City Plan Part 1 was held between the 22nd and 31st October 2013.

Following the EIP, a number of proposed modifications to the Submission City Plan were put forward and consulted upon between October and December 2014, including an SA of the proposed modifications. The results of this consultation were submitted to the Planning Inspector and have resulted in the publication of the Inspector's Further Issues and Matters.

A number of additional proposed modifications have now been put forward, which either respond to Matter 2 and Matter 3 of the Further Issues and Matters, or respond to consultation comments. In addition, there are additional proposed modifications arising from the publication of the draft Objectively Assessed Need for Housing: Brighton & Hove, June 2015 (GL Hearn). Any modifications must be subject to SA to ensure the likely sustainability effects of the implementing the Plan are assessed, documented and understood.

Purpose of this report

This purpose of this Addendum report is therefore to assess the sustainability implications associated with the additional proposed modifications to the Submission City Plan that have arisen from:

- The representations received during consultation on the Proposed Modifications to the City Plan, October 2014
- Matter 2 and 3, of the Inspector's Further Issues and Matters statement, April 2015
- Publication of the updated Objectively Assessed Need for Housing, June 2015

This report does not repeat information produced in the Submission SA, February 2013, nor the Proposed Modifications Sustainability Appraisal Addendum 2014, and should therefore be read alongside these documents. However, this document does replace the Further Matters SA published as an Appendix to BHCC Matter Statement 3, May 2015.

Section 2 – Changes affecting the Sustainability Appraisal Report

In order to ensure any new appraisal is placed in the current context, a review of the Plans, Policies and Guidance section, any local evidence, the baseline situation and the Sustainability Issues section of the Submission 2013 City Plan Sustainability Appraisal has taken place.

This review was also undertaken in October 2014, for the City Plan Proposed Modifications Sustainability Appraisal Addendum October 2014. Since this time, there has been one key change which is considered to be significant and should therefore be outlined in this Further Matters Additional Proposed Modifications SA report.

Housing

In June 2015, the draft Objectively Assessed Need for Housing: Brighton & Hove was published by GL Hearn. This provides an assessment of the objectively assessed need for affordable and market housing in the local authority area. This assessment concludes that the objectively assessed need for housing for Brighton & Hove for the plan period 2011-2031 is 30,120. This is equivalent to 1,506 dwellings per annum.

Baseline Data

The very nature of baseline data means that it is constantly evolving. Some data, such as the Census 2011 data, which is useful for context has been released since the last Submission City Plan SA 2013. Although it is useful, it is not considered to update the entire baseline data table at this stage. Monitoring the SA indicators in the Authorities Monitoring Report continues to present the opportunity to update and publish some of this updated data, allowing for trends to be analysed.

Sustainability Issues

The key Sustainability issues for the city continue to be:

Environmental:

- The Ecological Footprint is higher than the regional and national average
- The need to continue to reduce carbon emissions from all sources
- Flood risk; including tidal, surface water and groundwater
- Air quality; NO₂ levels continuing to exceed the Air Quality Objective particularly in central locations
- Congestion, noise and poor air quality resulting from transport, with a rise in transport related carbon emissions of 7% since 2007
- Groundwater quality (Brighton Chalk Aquifer) classified as “poor”
- The city is within a “highly water stressed” region with above regional average water consumption
- The city will need to provide an additional 167ha of various types of open space by 2030 in order to maintain its quantity standards

Social:

- The population of Brighton & Hove increased by over 10% in the period between 2001 and 2011
- The city has the highest rate of over-crowding outside London

- The city's housing remains largely unaffordable to the majority of its residents, with the average property costing over ten times the average income
- The annual housing need for both affordable and market housing is far greater than actual build levels
- The city is ranked as the 66th most deprived in England
- Health inequalities exist throughout the city with marked differences in life expectancy between the most deprived and most affluent areas

Economic

- The city exports a high number of workers and needs to develop high value businesses locally to retain higher skilled workers
- The city lacks affordable business accommodation
- There is evidence of the city developing a dual economy, with a high proportion of highly skilled jobs supported by a growing number of lower paid workers
- 8% of the working age population have no qualifications and educational attainment in secondary schools is below average
- The universities are growing along with the increasing requirements for student accommodation

Key positive sustainability achievements include:

- An overall reduction in CO2 tonnes per capita since 2005
- Levels of car ownership lower than national and regional averages
- Levels of travel to work by car lower than national and regional averages
- Year on year reduction of percentage of waste being disposed of at landfill
- The city contains a wealth of diverse designated wildlife sites of international, national and local significance
- The city includes areas of land falling within the South Downs National Park
- The city has an extremely attractive historic built environment including over 3400 listed buildings, 15 Scheduled Ancient Monuments, 6 Registered Parks and Gardens and 34 Conservation Areas.
- The city has one of the most highly qualified adult populations in the country, with 43% having a Level 4 (or equivalent) qualification
- The city contains the Regional Shopping Centre and contains significantly more shops compared to other city's of similar size, including a strong reputation for specialist retailers
- The city is a regional centre for employment and is home to the biggest cluster of creative and digital technology industries in the south east outside London
- Housing delivery in the city is showing signs of recovery from the economic recession, with housing completions increasing annually since 2010/2011 although still not reflective of pre-recession rates.

Section 3 Screening Additional Proposed Modifications

There are 22 additional proposed modifications that have been put forward at this stage.

The aim of the screening process is to identify amendments which are considered to make a difference to the most recent SA assessment of the policy, and are therefore considered significant enough to require re-appraisal. **A table outlining the full additional proposed modifications along with the results of the screening process can be found in Appendix A.**

The screening process has identified three main types of effects:

- no impact on any of the Sustainability Appraisal objectives, e.g. modification is of an editorial nature or for clarification/information purposes.
- a minor positive or negative effect on one or more of the Sustainability Appraisal objectives, but does not change the previous SA findings.
- a major positive or negative effect on one or more of the Sustainability Appraisal objectives, that results in a change to the previous SA findings and requires re-assessment.

Where a major positive or negative effect has been identified, a full re-appraisal of that policy has taken place.

In addition, although the changes to PM010 (The Strategy) and PM072 (CP1 Housing Delivery) are considered to be editorial and do not change policy text, in that they update the figure for the Objectively Assessed Need, these policies have been assessed again at this stage.

These assessments can be found in Appendix B and are summarised in Sections 5 and 6.

Of the 22 additional modifications put forward at this stage, 8 modifications relating to 4 policies were found to result in the need for re-appraisal. The following table summarises the screening findings.

Proposed Modification	Part of document / Policy	Further SA
PM003	Introduction and Overview	No
PM010	The Strategy	Yes
PM045	DA7 Toads Hole Valley	No
PM068	SA6 Sustainable Neighbourhoods	No
PM069	SA6 Sustainable Neighbourhoods	No
PM072	CP1 Housing Delivery	Yes
PM075	CP3 Employment Land	No
PM082	CP6 Visitor Accommodation,	No
PM117	CP7 Infrastructure and Developer Contributions	No
PM085	CP8 Sustainable Buildings	Yes
PM118	CP8 Sustainable Buildings	Yes
PM087	CP8 Sustainable Buildings	Yes

PM089	CP8 Sustainable Buildings	Yes
PM119	CP9 Sustainable Transport	No
PM120	CP12 Urban Design	No
PM121	CP15 Heritage	No
PM099	CP16 Open Space	No
PM102	CP17 Sports Provision	No
PM106	CP19 Housing Mix	No
PM122	CP20 Affordable Housing	Yes
PM123	CP20 Affordable Housing	Yes
PM108	CP21 Student Accommodation and HMOs	No

Section 4 Consideration of options at this stage

The Strategy and CP1 Housing Delivery - Consideration of Options

As the Objectively Assessed Need for Housing has increased the SA has revisited whether there is a need to re-assess options for housing delivery at this stage. However the SA concludes that the previous options assessment work carried out at former stages, particularly that carried out at Proposed Modifications stage October 2014, is still of relevance and is still applicable as explained below.

At Proposed Modifications stage, October 2014, the SA tested options relating to the spatial strategy and housing delivery.

Spatial Strategy

Option 1: No change to Spatial Strategy

Spatial strategy as set out in Submission City Plan Part 1 2013

- Development directed to 8 Development Areas
- Spatial Strategy based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
- Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
- No other development within the urban fringe
- 94% of dwellings delivered within built up area
- Housing target similar to that within the City Plan Part 1 (Submission)

Option 2: Revised Spatial Strategy

Revised spatial strategy which:

- Directs majority of development to 8 Development Areas
- Based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
- Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
- Spatial Strategy includes the urban fringe as a broad source of potential for housing, suitable for delivering approximately 1,060 dwellings on approximately 31ha (7.5% of total area)
- 85% of dwellings delivered within built up area
- Housing target increased above City Plan Part 1 (Submission)

Although the OAN for housing has increased since this last assessment, there are not considered to be any further options for the spatial strategy that can be assessed. The preferred option already maximises development on brownfield sites with the built up area boundary including through strategic allocations, housing estates regeneration, increased windfall allowance and increased mixed use on employment sites. It also includes development on greenfield urban fringe sites, with provision in this location based on a robust independent analysis of all urban fringe sites.

CP1 – Housing Delivery

Options assessed at Proposed Modifications stage as follows:

Option 1: 13,200 dwellings

- 12,150 from within built up area (including Toads Hole Valley) including:
 - SHLAA capacity on identified sites
 - Small sites with planning permission
 - Increased windfall allowance across plan period
 - Increased mixed use on employment sites
 - Capacity from HRA Estates Regeneration Project
- 1,060 from urban fringe broad area on approximately 31ha in total (as identified in Urban Fringe Assessment Study 2014)

Option 2 – 24,000 dwellings

- 13,210 as described in option 1
- 5,395 from loss of 54 ha of employment sites¹
- 5,395 from loss of 108 ha of open space within the built up area²

Loss of employment land and loss of open space based on a 50:50 split (of the shortfall) to achieve the net additional housing required (10,770 units) to meet the upper end of the OAN (24,000). Density levels on employment sites and sites of open space calculated as:

- 100 dph for Employment Land
- 50 dph for Open Space

The assessment of Option 2 at Proposed Modifications stage made some of the following conclusions:

- The option has greater potential for positive impacts (than option 1) against the housing objective, and is likely to contribute to reducing some of the existing social issues, such as unaffordability and over-crowding.
- The option is likely to result in significant adverse impacts for the local economy, as well as on the local community's health due to reduced employment opportunities and increasing income/employment-based deprivation levels, and these impacts are considered to be permanent, increasing in the long term and are unable to be mitigated against.
- It is considered highly unlikely that the adverse social impacts associated with loss of open space within the built up area, particularly health and health-based deprivation, could be mitigated against.
- In addition, it is considered highly unlikely that the (*loss of*) open space (*within the built up area*) could be replaced elsewhere in the city due to limitations over land availability, and could not be mitigated by its close proximity to the National Park, in the same way that loss on the urban fringe can be. It will result in an absolute and permanent loss of open space within the built up area that cannot be mitigated against.

¹ 54ha equivalent of 39% of employment sites in the city.

² 108ha equivalent to 32% of open space within the built up area, e.g. not including open space within the urban fringe or the South Downs National Park.

- The adverse transport impacts associated with Option 2 are considered to be greater, as this option will result in a larger population, as well as result in out-commuting at levels greater than the in-commuting associated with Option 1.
- Overall, the positive social impacts of meeting the OAN are considered to be outweighed by some of the adverse impacts, including those related to loss of employment sites and the impacts this will have upon the local economy which cannot be mitigated against, as well as the impacts on deprivation and the potential for the widening of health inequalities associated with the combined loss of employment opportunities and loss of greater amounts of open space within the urban area.

The option to meet the updated OAN, June 2015

At this stage, the need for the assessment of a further option which meets the updated OAN in full (30,120) has to be considered. Assuming that the 13,200 housing target is delivered as outlined in Option 1 above, which already includes the full SHLAA capacity, mixed use on some employment sites, estates regeneration, development within the urban fringe, again the only options to accommodate any additional housing are considered to be through the loss of existing employment land and loss of existing open space.

Based on a 50:50 split to achieve the net additional housing required (16,910 units) to meet the updated OAN the following would be required:

- 8,455 units to be delivered on sites currently in employment uses, and
- 8,455 units to be delivered on sites currently in open space uses within the built up area.

Based on the density levels of 100dpa being achieved on employment sites and 50dpa achieved on open space the following loss would be required:

- 85ha of employment sites
- 169ha of open space within the built up area.

In terms of loss of employment sites, 85ha would be the equivalent of losing 61% of employment sites (safeguarded sites and strategic allocations) in the city (see table below). In terms of loss of open space, 169ha would be the equivalent of losing 51% of open space (natural/semi natural, parks & gardens, outdoor sport and children's playspace) within the built up area (e.g. not including open space within the urban fringe or SDNP – see table below).

With reference to the conclusions of the SA of Option 2 at Proposed Modifications stage, to local evidence, namely the Employment Land Study and Open Space Study, both of which indicate a need to increase provision of both types of land, and in reference to various paragraphs of the NPPF which states there are three dimensions of sustainable development and that these roles should not be undertaken in isolation, it is not considered that to meet the updated OAN would be a reasonable option, given the overall objectives of the City Plan, and has therefore not been subject to further assessment at this stage.

Explanation of Employment Land calculation:

Employment land from the following sources considered to be “available” for the purposes of this options consideration:

Location	Total estimated amount
Safeguarded Sites (CP3) (nb: these are existing occupied premises)	42ha
Strategic Allocations (DA policies)	97ha
Total	139ha

Employment sites that are defined as mixed use (current total 6ha) and unallocated site (total hectares unknown) have not been included within this calculation as these have either already been included in the SHLAA or have been included in the windfall allowance.

Explanation of Open Space calculation:

For the purposes of this options consideration Open Space lost would be from the following typologies of open space within the **built up area**, and does not include that as assessed with the Urban Fringe Assessment (as this has already been subject to an assessment), nor that which is situated within the South Downs National Park (as this cannot be included within Brighton & Hove’s City Plan).

Open Space considered to be “available” for the purposes of this assessment that is within the built up area includes:

- Natural & Semi Natural (total in BUA 125 ha)
- Parks & Gardens (total in BUA 145ha)
- Outdoor Sport (total in BUA 54ha)
- Children and young people (total in BUA 10ha)

Total = 334ha within the built up area

For the purpose of this options consideration, the open space typologies of amenity greenspace, cemeteries and allotments were included in the potential types of open space to be lost.

- Amenity greenspace generally includes small pockets of open space within existing areas of housing as well as includes grass verges along road-sides. Some of the existing amenity greenspace is likely to be lost to housing through the HRA Estates Regeneration Programme, which has already been counted within the housing target.
- The council has a statutory duty to provide cemeteries and allotments. If they were removed they would have to be replaced on a like for like basis elsewhere in the city.

Section 5 Summary of Policy Re-assessments

- The Strategy
- CP1 Housing Delivery

The screening process identified that the changes to The Strategy and CP1 Housing Delivery should be re-appraised due to the updated OAN figure.

The full revised appraisal tables for these policies can be found in Appendix B.

The Strategy & CP1 Housing Delivery – Summary of Assessments

The following table summarises the sustainability implications of the policies.

Policy	Summary of main sustainability implications
The Strategy	<p>The modifications update the OAN and do not change policy text as such.</p> <p>Overall, the SA findings have not changed, however the SA has been updated to reflect the updated OAN. Key sustainability implications of the Spatial Strategy are:</p> <p>Mixed impacts for the housing objective. This reflects the increase in housing to be delivered over the plan period over existing levels (13,200), but acknowledging the significant shortfall (56% of updated OAN).</p> <p>Overall positive impacts for employment and economic development.</p> <p>Adverse impacts on the environmental objectives reflecting the inclusion of the urban fringe as a broad source of potential, however through mitigation these impacts should be reduced.</p> <p>Overall, the spatial strategy is a balanced strategy that considers all the elements of sustainable development.</p>
CP1	<p>The modifications mainly update the OAN which is situated in the supporting text. There is no change to policy text as such, however the entire SA of CP1 has been updated to reflect the updated OAN. Key sustainability implications of CP1 are:</p> <p><u>Social:</u> Mixed impacts for the social objectives for housing and health. The policy generally has positive impacts against the SA objective 5 (housing) as will result in an increase in housing. However, set in the context of the updated OAN there is a significant shortfall (56%) which may result in some existing social issues (e.g. overcrowding, affordability, social mobility) not being addressed and therefore the impacts overall are considered to be mixed (-/+).</p> <p>In the long term the significance of the adverse impact associated with the shortfall is anticipated to increase. This is based on the likelihood that the OAN and therefore the shortfall will continue to increase, based on past trends and predicted future population trends. This could have greater transboundary impacts in the long-term as the pressure to find an</p>

alternative location outside the city's boundaries to meet local housing need increases. This highlights the need for ongoing and proactive discussion under the Duty to Cooperate and it is noted that this is strongly referred to in the revised supporting text.

Environmental:

The amount of housing to be delivered adds to the potential for adverse impacts on other objectives including 2 (air quality); 6 (reducing car journeys); and those relating to resource consumption; these were also identified at Submission stage. Transport impacts may be exacerbated by the increased shortfall between the housing target and the OAN due to the potential for this to lead to increased in-commuting for employment purposes, although this will be limited by the amount of economic growth the city can accommodate.

Residential development on the urban fringe could result in a range of adverse impacts including on objective 1 (biodiversity), 3 (local distinctiveness/open space), 4 (SDNP), 7 (water pollution/flood risk), 15 (deprivation), 19 (climate change adaptation) and 21 (accessibility). Some of these could also result from development within the built up area and were identified in the Submission stage SA. Mitigation will be required to reduce these impacts.

Economic:

Overall positive impacts for employment and economic development, based on the links between house-building and the economy and the balance in the protection of employment land for employment uses. It is uncertain whether the inability to meet the full housing need will have any impacts on economic development. National studies indicate that in strong economic cities, lack of housing supply can constrain economic growth by restricting labour market mobility and exacerbating skills shortages. However, this varies from city to city and there has been no local assessment of this to draw upon. Overall economic impacts are still considered to be positive.

Section 6 Summary of Assessments

- CP8 Sustainable Building
- CP20 Affordable Housing

The screening process identified the changes to CP8 and CP20 should be re-appraised.

The full revised appraisal tables for these policies can be found in Appendix B.

The following table summarises the sustainability implications of the further proposed modifications for policies CP8 and CP20.

Policy	Summary of main sustainability implications and changes to Sustainability Appraisal
CP8	<p><u>Overall Summary</u></p> <p>The amendments to the policy were found to have an impact on assessments of the previous iteration of the policy for the SA objectives for biodiversity (1), water (8) and energy (18), reducing the impacts from significantly positive to positive. The amendments were found to make the impacts on deprivation (15) more uncertain. The amendments were also found to potentially have a slight positive yet uncertain impact on SA objectives for housing (5) and economic development (12). No impacts on the other SA objectives were identified, although the loss of the requirement to meet Code for Sustainable Homes is likely to impact on the achievement of various environmental objectives.</p> <p><u>Impacts on SA objectives on water and energy use</u></p> <p><u>Water</u></p> <p>The removal of the requirement for residential development to meet Code for Sustainable Homes standards (previously Level 4 rising to Level 5 post 2016) is likely to have implications on water use. CSH4 required development to achieve 105l/p/day³; CSH5 required development to achieve 80l/p/day. The optional technical standard for water now included in the policy requires the achievement of a minimum 110l/p/day, which is a standard between CSH2 (120l) and CSH3/4 (105l). Locally, average water consumption in 2012/2013 was 132l/p/day, therefore achieving the new water standard should help to reduce average consumption, having a positive impact overall, however the saving in water consumption is unlikely to be as significant as previous requirements. It is recognised that the policy still requires development to aspire to water neutrality, however an aspiration may not be delivered in practice and it is difficult to know how this will be implemented in combination with the water standard.</p> <p><u>Energy: Allowable Solutions</u></p> <p>The exemption from Allowable Solutions has not yet been defined in government policy, however it is likely that small developments, i.e. those delivering less than 10 units, will be exempt from this part of the zero carbon homes standard. This means that these developments will only be required to</p>

http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf³

meet the minimum energy efficiency standard, as set in Building Regulations. The 2015 Written Ministerial Statement⁴ indicates that this will be the equivalent of CSH4 and is equivalent to a 19% improvement on Part L Building Regulations. The previous iteration of the policy required all developments, regardless of size to reach CSH5, which would have meant a 100% improvement in energy/carbon performance on Part L Building Regulations or use of the financial offset mechanism 'Allowable Solutions' to contribute to carbon reduction offsite. This will have obvious implications on carbon emissions locally and the energy efficiency of new residential development, particularly when considering the amount of development that has come forward on smaller sites historically is high (55% between 2012-2014).

The Brighton & Hove Renewable Energy Study 2012⁵ confirms that unless improvements to the energy efficiency of existing housing stock take place, the city will not meet its carbon reduction targets (19% of the carbon reduction target comes from retrofitting existing stock). The Allowable Solutions scheme is one possible mechanism for improving existing stock, however this does depend on how the scheme will be implemented which is currently not clear. The exemption of small sites could significantly reduce the amount of funding available for this purpose. It is recognised that large sites will still be required to meet the Allowable Solutions element of zero carbon homes, if they do not meet the standard on site, and that this could support future improvements in energy efficiency in the city, if government allow local schemes. However overall this exemption is likely to have an impact on the scale of improvements achieved, although this is very uncertain and will depend on how the Allowable Solutions scheme is implemented.

Energy: Code for Sustainable Homes

The new policy requirements relating to energy performance are (2013-2016) to make a 19% improvement on Part L 2013. This is known to be equivalent to CSH4 standards for energy efficiency and is therefore not considered to have any impact on the short-term score. Post 2016, development is required to meet "zero carbon homes" standard. At the time of writing, this actual standard has not been defined, but will incorporate meeting a certain minimum standard of Building Regulations (equivalent of CSH4), plus the Allowable Solutions element that will allow off-site carbon abatement measures if the full zero carbon homes standard cannot be met on-site. This is not considered to be as strong as the previous policy position that required CSH5 to be met in full and would have been the equivalent of 100% improvement in energy/carbon performance, and will have an impact on energy consumption and carbon emissions locally.

In summary, although the general direction of the policy against the SA objective for reduction in energy use is still positive, with various remaining policy requirements that are positive towards carbon reduction and improving energy performance, the removal of the Code for Sustainable Homes standards in combination with the future exemption from Allowable Solutions has reduced the score from significantly positive to positive and is lower than

⁴ <https://www.gov.uk/government/speeches/planning-update-march-2015>

⁵ http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/BrightonandHove_Energy_Study_Jan2013.pdf

the previous version.

Impacts on SA objectives for economic development

There were no impacts identified on the economic development objective arising from the previous iteration of the policy. The future exemption for small sites from the Allowable Solutions element of zero carbon homes was found to have a minor positive impact on the economic development objective. This is based on the potential for the exemption to reduce building costs on small housing sites, and the possibility that this may help some small sites to come forward, with house-building being strongly linked to economic growth. However, this is considered to be highly uncertain and will depend on implementation of the Allowable Solutions exemption and market conditions.

Impacts on SA objectives for housing and deprivation

There were no impacts identified on the housing objective arising from the previous iteration of the policy. The future exemption for small sites from the Allowable Solutions element of zero carbon homes was found to have a minor positive impact on the housing objective. This is based on the potential for the exemption to reduce building costs on small housing sites, and the possibility that this may help some small sites to come forward. However, this is considered to be highly uncertain and will depend on implementation of the Allowable Solutions exemption and market conditions.

Impacts on deprivation were considered to be positive in the previous iteration of the policy due to the cost-benefits of living in a highly efficient home which could be passed on to the owner, potentially helping to reduce fuel poverty. The change in the energy efficiency standard will have a direct impact on home-owners, and although new homes will be more energy efficient than older housing stock, there is still likely to be a cost associated with heating and lighting a home. The reduction in this standard could therefore impact on fuel poverty.

The exemption from the Allowable Solutions scheme also has potential to have an indirect adverse impact on fuel poverty. This is due to the possible reduction in funding available through the Allowable Solutions scheme that could have been used to improve energy efficiency of existing building stock. There is a great deal of uncertainty around this however, which has led to an uncertain impact against this objective.

Other environmental objectives

Other environmental objectives may be impacted since the CSH involves assessment and delivery of a variety of environmental issues and withdrawal of CSH is replaced only by standards for water and energy efficiency.

The Code for Sustainable Homes requires scoring in various categories against various issues. Of these issues, some include mandatory minimum scores (see table below - identified with an 'M'), whilst other issues are 'tradable' and can be used to accumulate an overall score to achieve the relevant CSH Level. The impact of losing this assessment tool, which is externally audited and certified, delivering an evidenced assessment of standards at design stage and post construction, is hard to measure.

Whilst Policy CP8 asks that these types of sustainability issue be addressed,

	<p>by losing means of securing this, the ability of the policy to ensure delivery is somewhat compromised.</p>
<p>CP20</p>	<p><u>Overall Summary</u> The amendments to the policy were found to have an impact on assessments of the previous iteration of the policy for the SA objectives for housing (5), health (13) and deprivation (15). The amendments were also found to potentially have a slight impact on SA objectives for employment (11) and economic development (12) although these considered to be less significant. No impacts on the other SA objectives were identified.</p> <p><u>Impacts on SA Objectives for housing, health and deprivation</u> The assessment of the previous iteration of the policy found the impacts on housing and health to be significantly positive across all timescales, and positive for deprivation. The assessment of the amended policy still finds the impact on these objectives to be positive, but becomes less significant in the long term, as outlined below.</p> <p>According to the SHLAA 2014 (<i>see table below</i>), 604 units of housing are anticipated to come forward on sites delivering between 6-10 units of housing in the 2014-2030 period. This is equivalent to 5% of the total housing target for this period (11,120 units). If these sites had been delivered in accordance with the Submission policy CP20 requirements, this would have provided approximately 124 units of affordable housing (or as an equivalent financial contribution). This is equivalent to 3% of the total amount of affordable housing anticipated to have been delivered over this period (4,304 units) but is only 1% of the total amount of housing anticipated to come forward in the 2014-2030 period. This, in itself is therefore not considered to be a significant reduction.</p> <p>However the amendment to policy will also have an impact that is not as easy to quantify. Historically, a high proportion of housing in the city has been delivered on windfall sites delivering 9 or fewer units. This could, in part, have been caused by the “threshold effect” of the existing Local Plan policy requirements which requires affordable housing from schemes of more than 10 units, but could also be reflective of the size of sites available in the city. Between 2010-2014 19% of the housing delivered in the city was on sites of between 6-9 units (albeit not all windfall sites). If similar patterns of delivery continue to come forward on windfall sites then there could be a significant amount of housing delivered that will no longer be required to make any affordable housing contribution due to the proposed amendments to policy CP20.</p> <p>The reduction in affordable housing resulting from this change to policy also needs to be considered against the local affordable housing need. The Assessment of Affordable Housing Need (2012) assessed this need as being 12,550 units in the 2012-2017 period, which includes a back-log of over 7,000 units. This is considered to be a significant need. The amended policy should result in 4,180 units of affordable housing (over the 2014-2030 period), and therefore only partially meets the local affordable housing need.</p> <p>It is therefore considered likely that this change to policy will have a direct</p>

impact on people in need of affordable housing in this city. In particular, any reduction in affordable housing stock availability will directly affect the ability of some individuals to access a home that meets their needs (SA objective 5 – Housing). It will also indirectly affect health (SA objective 13) and deprivation (SA objective 15), with housing being one of the wider determinants of health, and barriers to accessing housing being one of the measures of housing-based deprivation.

In summary, the policy will still deliver 4,180 units of affordable housing from identified sites over the 2014-2030 period, which is 38% of the total housing to be delivered over this timescale and is still considered to be a significant contribution towards the local affordable housing need. This therefore results in significant positive impacts against relevant SA objectives. However, due to the high level of housing need locally and the likelihood that this need will continue to increase due to a year on year under-supply, the positive impact is anticipated to become less significant in the long term. This pattern is also reflected in the score against the SA objective for health in the long term.

Impacts on SA Objectives for Economic Development and Employment

The Affordable Housing Viability Study 2012 found the requirement to secure affordable housing contributions from schemes delivering between 6-9 units to be viable. The removal of this policy requirement is therefore not considered to have any impact on viability, as the policy requirements were already considered to be viable. The removal of this requirement could reduce costs associated with house-building. This could positively impact on economic growth and employment opportunities by bringing small sites forward, however this is not considered to impact significantly more on the employment and economic development objectives than the assessment of the previous iteration of the policy which already found the impact to be positive. The government consultation on Planning Performance and Contributions, which consulted on the option to remove contributions on smaller sites did not consider there to be any business impacts.

Table to show categories and issues previously assessed under Code for Sustainable Homes.

CSH Categories	Issue
Energy and CO2 Emissions	Dwelling emission rate (M) Fabric energy efficiency (M) Energy display devices Drying space Energy labelled white goods External lighting Low and zero carbon technologies Cycle storage Home office
Water	Indoor water use (M)

	External water use
Materials	Environmental impact of materials (M) Responsible sourcing of materials – basic building elements Responsible sourcing of materials – finishing elements
Surface Water Run-off	Management of surface water run-off from developments (M) Flood risk
Waste	Storage of non-recyclable waste and recyclable household waste (M) Construction site waste management Composting
Pollution	Global warming potential (GWP) of insulants NOX emissions
Health and Well-being	Daylighting Sound insulation Private space Lifetime Homes (M)
Management	Home user guide Considerate Constructors Scheme Construction site impacts Security
Ecology	Ecological value of site Ecological enhancement Protection of ecological features Change in ecological value of site Building footprint

Tables to show SHLAA 2014 analysis and the amounts of affordable housing anticipated to be delivered under a) Submission CP20 requirements and b) Proposed Amendments CP20 requirements.

A)Submission City Plan

Submission CP20	6-9 (2014-2030)	10-14 units (2014-2030)	15+ units (2014-2030)	Totals
Total amount (units)	574	290 (nb 30 of these are schemes delivering 10 units).	10,256	11,120*
Proportion Affordable at 20%	115	0	0	115
Proportion Affordable at 30%	0	87 (9 of which are from schemes delivering 10 units).	0	87
Proportion Affordable at 40%	0	0	4,102	4,102
Total affordable units expected	115	87	4,102	4,304

B) Proposed Amendments

Amended CP20	6-10 (2014-2030)	11-14 units (2014-2030)	15+ units (2014-2030)	Totals
Total amount (units)	604	260	10,256	11,120*
Proportion Affordable at 30%	0	78	0	78
Proportion Affordable at 40%	0	0	4,102	4,102
Total affordable units expected	0	78	4,102	4,180

* Includes: Identified Sites in DAs; Identified sites outside DAs; Small Identified Sites (<6 units). Does not include broad locations, or unidentified site allowance.

Section 7 Mitigation and Recommendations

The Strategy and CP1 Housing Delivery

The shortfall between the housing target (13,200) and the updated OAN (30,120) has increased to 56%. Although the plan will still deliver a minimum of 13,200 units, which is a significant increase in local housing stock, not meeting housing need will have implications and certain local issues such as affordability are likely to continue. No recommended changes are made at this stage, as the SA has previously assessed other options for housing delivery which were discounted as they were not considered to be balanced and sustainable.

In terms of mitigation, the shortfall further strengthens the need for ongoing proactive discussions with neighbouring authorities under the Duty to Cooperate obligation, which the SA recognises is referred to within the supporting text of policy CP1.

CP8 and CP20

Some of the changes to these policies result in less positive impacts than previous iterations, however as the changes themselves reflect the direction of national policy they cannot be avoided. No recommendations have therefore been put forward for further changes to policies CP8 and CP20 at this stage.

It is noted that policy CP8 Sustainable Buildings was cited in the Submission City Plan as providing mitigation for various developmental policies, including the Development Area policies, as this policy in particular helped to ensure consumption of natural resources associated with the levels of development set out in the Plan would be minimised, along with mitigating various other impacts. The impact of losing the Code for Sustainable Homes assessment tool, which is externally audited and certified, delivering an evidenced assessment of standards at design stage and post construction, is hard to measure and whilst Policy CP8 still asks that various types of sustainability issue are addressed, by losing means of securing this, the ability of the policy to ensure delivery is somewhat compromised.

Mitigation put forward at previous stages is still applicable for all policies.

Section 8 Cumulative Impacts

As some of the appraisals have changed, the cumulative impacts have been re-assessed in order to ensure the impacts of the entire plan are considered together. The summary tables showing the cumulative impacts can be found in Appendix D.

The majority of the additional proposed modifications have had no significant impact on the SA findings and are unlikely to affect the cumulative impacts of the City Plan.

The changes to CP8 Sustainable Buildings and CP20 Affordable Housing may have some cumulative impacts. It is possible that some housing on small sites may come forward more readily, due to the affordable housing contributions exemption, the reduction in energy and water standards required and the exemption from Allowable Solutions. This would have positive implications for market-housing and possibly economic growth.

However these exemptions are also likely to have some negative implications. The exemption from affordable housing contributions will result in a lower amount of affordable housing being delivered with this iteration of the Plan. The removal of the requirements for development to meet the Code for Sustainable Homes, combined with the future exemption from Allowable Solutions will have an impact on the consumption of natural resources, including energy and water, impacting on future carbon emissions, as well as having a range of other impacts and may impact on the ability of CP8 to be fully delivered. In particular, consumption of water and carbon emissions will be higher with this iteration of the Plan.

The changes to CP1 may have some further transboundary impacts due to the need to accommodate the city's unmet housing need.

Overall, the cumulative impacts of the City Plan, as modified are as follows.

Significant positive impacts are still considered to be:

- An increase in housing, including some affordable housing albeit at a level below the city's objectively assessed and affordable housing need, highlighting the ongoing need for discussions under the Duty to Co-operate.
- An increase in the amount of land for employment uses, having economic benefits.
- Overall improvements in the design, quality and sustainability of new development.
- Improvements in access to services, through both increased provision and improvements in transport infrastructure
- Delivery of many of the wider determinants of health, including housing and employment opportunities, although it is recognised that some existing social issues associated with under-supply of housing are likely to continue

Significant adverse impacts are still considered to be:

- Increase in traffic congestion and associated impacts including air quality, carbon emissions, with this likely to be more problematic in central areas and in the morning peak time.

- Increase in pressure between competing land uses, resulting in increased loss in greenfield sites, some of which perform an open space function, and associated impacts such as visual impacts and other environmental impacts associated with the services ecosystems provide, such as adapting to climate change.
- Increased consumption of natural resources, particular water and the impact of this on the Brighton Chalk Aquifer.
- Increased pressure on local amenities, particularly open space which will become more significant as the population increases.

Appendix A - Further Modifications required through Matters 2b and 3, in response to consultation on Proposed Modifications, and in response to the updated Objectively Assessed Need for Housing

Initial Sustainability Appraisal Screening

Additional modifications are highlighted in **yellow**.

Ref	Policy, page no.	Proposed Modification	SA implications
PM003	Introduction and Overview, page 5 Paragraph 1.4	<ul style="list-style-type: none"> The South Downs National Park was formally designated in April³¹ March 2010 and the National Park Authority brought into effect in April 2011. This is now the planning authority for the administrative area of Brighton & Hove that falls within the National Park. This area will no longer be covered by the Brighton & Hove City Plan Part 1 policies but will be covered by the Core Strategy <u>Local Plan</u> for the National Park. 	Editorial. No impact on SA. No further SA assessment required.
PM010	The Strategy	<p>a) Amendment to paragraph 2.20, second sentence:</p> <p><u>However, in light of the significant scale of the city's housing need, objectively assessed to fall within a range of 18,000 – 24,000 as 30,120 new homes to 2030, the requirementetc</u></p> <p>b) Amendment to footnote#</p> <p><u>#Coastal West Sussex Housing Study Update 2014 Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited.</u></p>	Editorial in nature, however could have implications. Test in SA
PM045	DA7 Toad's Hole Valley	<p>DA7 Toads Hole Valley</p> <p>High standards of sustainable development</p> <p>3.86 Environmental sustainability will be central to the design and layout of development at Toad's Hole Valley which will be expected to meet <u>the requirements set out in CP8 Sustainable Buildings Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon or carbon neutral.</u> When it can be demonstrated that sustainable</p>	This provides further clarification and guidance as to how the allowable solutions exemptions will be sought. This amendment is not considered to alter the

		building standards cannot be met on site, mitigation measures will be sought in accordance with the national zero carbon policy in which exemptions may apply, and City Plan policy CP8 Sustainable Buildings and CP7 Infrastructure and Developer Contributions through Allowable Solutions or an agreed local offset mechanism.	findings of previous SA assessments. No further assessment required.
PM068	SA6 Sustainable Neighbourhoods, page 120	A. 8. Deliver balanced communities through the requirement for new residential development to provide an appropriate amount of affordable housing, mix of dwelling sizes and tenure types and to through the City Plan Part 2 ensure new housing meets lifetime homes standards, optional technical standards for access and minimum dwelling space standards the nationally described space standards. In areas where there is a concentration of social rented housing, a better choice of housing tenures will be sought (see CP1 Housing Delivery, CP19 Housing Mix and CP20 Affordable Housing).	Policy amended to accord with national policy. This criteria was introduced to the policy at Proposed Modifications stage. The SA screening undertaken at that stage found it to strengthen the existing strong positive impact on the health and housing objectives, however did not change the score from the previous version which did not include the requirement. This further amendment, is therefore not considered to alter the findings of previous SA assessments. No further assessment required.
PM069	SA6 Sustainable Neighbourhoods, page 121	Add bullet point to the list of aims in paragraph 3.172: <ul style="list-style-type: none"> ensure new residential development provides for an appropriate mix of dwelling 	See response to PM068 above.

		<p>types and tenures and meets minimum space standards the new national technical standards and through the City Plan part 2 seek to apply the nationally described space standards and optional technical requirements in respect to accessibility, adaptability and wheelchair standards.</p>	
PM072	CP1 Housing Delivery	<p>a) Amendment to paragraph 4.2</p> <p>A series of studies indicate that to meet in full the city's 'objectively assessed housing need' (housing demand and need) over the plan period to 2030 could mean needing to build 1506 between 900 – 1200 dwellings per annum or 18,000 – 24,000 30,120 dwellings to 2030.</p> <p>b) Amend footnote 127</p> <p>Assessment of Housing Development Needs Study: Sussex Coast HMA, May 2014. Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited.</p> <p>c) Add additional text after the third sentence within paragraph 4.5</p> <p>The fact that the city's housing delivery target does not match the objectively assessed full housing requirement means that there is a 'duty to cooperate' with the city's neighbouring local authorities. Brighton & Hove's strategic housing market and travel to work area extends westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes and northwards to Mid Sussex, Horsham and Crawley. Many of these areas also face similar challenges in meeting housing requirements. <u>Within Brighton & Hove, the council acknowledges that there is a significant housing shortfall⁶ against the objectively assessed housing requirement of 30,120 dwellings to 2030.</u> In accordance with government guidance, the council will <u>therefore</u> continue <u>to</u> engage constructively, actively and on an ongoing basis with</p>	<p>Amendments to supporting text. Considered to be mainly editorial in nature, however updated OAN figure could have implications and requires reassessment to ensure assessment is placed in the current context.</p> <p>Test through SA.</p>

⁶ Equivalent to 16,920 units over the plan period to 2030.

		<p>neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.</p> <p>Add new bullet point: * Equivalent to 16,920 units over the plan period to 2030.</p>	
PM075	CP3 Employment Land, pages 138-139	<p>3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:</p> <p>Centenary Industrial Estate English Close Industrial Area, Old Shoreham Road Home Farm Industrial Area Hove Technology Park, St Josephs Close, Old Shoreham Road Moulsecomb & Fairways Industrial Estate Sussex House (including BT depot) Woodingdean Business Park Hyde Business Park, Bevendean Bell Tower Industrial Estate Hollingbury Industrial Estate Hollingdean Industrial Estate Victoria Road Industrial Estate Newtown Road Industrial Estate</p> <p>The council will support proposals for the upgrade and refurbishment of these estates and premises so that they meet modern standards required by business, are more resource efficient and improve the environment or townscape of the site or premise.</p>	<p>The policy was last assessed at Proposed Modifications stage (2014). The removal of the wording “affordable” from paragraph 3.5 is considered to clarify the meaning of the policy, which goes on to state “in accordance with policy CP20 Affordable Housing”. The policy never required 100% affordable housing on unallocated employment sites/premises allowed to be released for other uses, however it is understood that the</p>

		<p>Sui generis uses, <u>including waste management facilities</u>, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1- B2 <u>B8 Use Classes</u>[#]; do not harm the continuation of existing uses within those Classes and comply with other City Plan policies <u>and for waste management facilities the Waste and Minerals Plan</u>.</p> <p>4. In order to secure good quality modern, flexible employment floorspace the council will allow employment-led (residential and employment) mixed use development on the following employment sites:</p> <ul style="list-style-type: none"> Franklin Road Industrial Estate School Road, Hove Melbourne Street Industrial Area Portland Road Trading Estate (including EDF and Martello House) Land North of Newtown Road <p><u>There should be no net loss in employment floorspace- unless this can be justified. Paragraph 4.36 sets out the factors that will be taken into consideration.</u></p> <p>5. <u>Loss of Unallocated sites or premises in, or whose last use was</u>, employment use (Use Classes B1-B8) will not be released to other uses unless <u>only be permitted where</u> the site or premises it can be demonstrated to be both redundant and incapable of meeting the needs of <u>modern alternative employment uses (Use Classes B1-B8)</u>. Where release <u>loss</u> is permitted the <u>preference priority</u> for re-use will be for alternative employment generating uses or affordable housing (in accordance with CP20 Affordable Housing).</p> <p>Insert new footnote: [#] Employment generation as compared with average employment densities as set out in Table 3 of the HCA/Offpat Employment Densities Guide, 2010 or subsequent updates.</p>	<p>policy could have been misinterpreted as such. The policy, as modified, is still found to have a minor positive impact on the SA objective 5 (Housing), and is the same as the previous SA assessment.</p> <p>No further SA assessment required of CP3.</p>
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<p>PM082</p>	<p>CP6 Visitor Accommodation, Page 153</p>	<p>4.58 The city has a significant stock of hotel and guest accommodation; a total of 160 hotels and guest accommodation predominantly located in central Brighton and along the seafront. The council undertook a capacity and needs analysis of hotel bedspacesrooms in the city to understand the future capacity of the city to absorb new hotel accommodation (2007 Hotel Futures Study). Since the study was completed 3 new hotels have come into operation (Jury's Inn, MyHotel and Royal York hotel) adding 365 bedspacesrooms (although the later is now in operation as a 151 bed youth hostel). Furthermore there is the potential for an additional 372 bedspacesrooms through recent outstanding planning commitments¹⁷⁵.</p>	<p>Adds further clarification. No impact on SA.</p> <p>No further SA assessment required of CP6.</p>																							
<p>PM</p>	<p>CP7 Infrastructure and Developer Contributions, page 157</p>	<p>Update supporting text: 4.72 ...Upon adoption of CIL or after 6 April 2014 2015, pooled contributions can only be sought from up to 5 separate planning obligations for an item of infrastructure.</p>	<p>No impact on SA. No further SA assessment required of CP7.</p>																							
<p>PM085</p>	<p>CP8 Sustainable Buildings, page 160</p>	<p>1. All development will be required to achieve the minimum standard as set out below or equivalent standards from a quality assured scheme;</p> <p>Replace table set out under CP8.1:</p> <table border="1" data-bbox="595 973 1279 1420"> <thead> <tr> <th rowspan="3"></th> <th colspan="4">Development size</th> </tr> <tr> <th colspan="2">2013-2016</th> <th>Post 2016</th> <th>Post 2019</th> </tr> <tr> <th>Non-major</th> <th>Major and Greenfield</th> <th>All</th> <th>All</th> </tr> </thead> <tbody> <tr> <td>Residential Code for Sustainable Homes</td> <td colspan="2">Level 4 Level 5</td> <td colspan="2">Level 5 Level 6</td> </tr> <tr> <td>Non-residential</td> <td>Very Good</td> <td colspan="2">Excellent</td> <td>Outstanding</td> </tr> </tbody> </table>		Development size				2013-2016		Post 2016	Post 2019	Non-major	Major and Greenfield	All	All	Residential Code for Sustainable Homes	Level 4 Level 5		Level 5 Level 6		Non-residential	Very Good	Excellent		Outstanding	<p>This is a significant change to the policy text.</p> <p>Full further SA required to consider and assess the impacts.</p> <p>See Section 3 and Appendix B of this report for full assessment.</p>
	Development size																									
	2013-2016			Post 2016	Post 2019																					
	Non-major	Major and Greenfield	All	All																						
Residential Code for Sustainable Homes	Level 4 Level 5		Level 5 Level 6																							
Non-residential	Very Good	Excellent		Outstanding																						

BREEAM			
CONVE RSIONS	Non-major (3-9 units) and Major		
Resident ial	BREEAM Very good		

With:

Residential	<u>Until the adoption of national Zero Carbon Homes standard</u>	<u>Post Adoption of Zero Carbon Homes standard⁷</u>	
Energy Performance	<u>19% carbon reduction improvement against Part L 2013⁸</u>	<u>Zero Carbon</u>	
Water Performance	<u>Water efficiency 'optional' standard⁹</u>		
	2013-2019		Post 2019
Non-residential	Development size		
	Non-major	Major and Greenfield	All
	Very	Excellent	Outstandin

		<table border="1"> <tr> <td>BREEAM</td> <td>Good</td> <td></td> <td>g¹⁰</td> </tr> <tr> <td>CONVERSIONS</td> <td colspan="3">Non-major (3-9 units) and Major</td> </tr> <tr> <td>Residential</td> <td colspan="3">BREEAM Very good¹¹</td> </tr> </table> <p>New footnotes to table: ¹ Expected to be late 2016 ² This standard is equivalent to Code for Sustainable Homes level 4 in energy use. See paragraph 4.84-4.86 for guidance on demonstrating this standard. ³ The 'optional' enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency' March 2015, page 15, G2(3). At 2015 this is defined as consumption 110 litres per person per day to be demonstrated. http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_G_2015.pdf ⁴ Unless superseded by national prescribed standards ⁵ Unless superseded by national prescribed standard</p> <p>Standards may be updated in other DPD documents and/or a review of this policy.</p>	BREEAM	Good		g ¹⁰	CONVERSIONS	Non-major (3-9 units) and Major			Residential	BREEAM Very good ¹¹			
BREEAM	Good		g ¹⁰												
CONVERSIONS	Non-major (3-9 units) and Major														
Residential	BREEAM Very good ¹¹														
PM118	CP8 Sustainable Buildings, Page 162	<p>When onsite sustainability standards cannot be met mitigation measures may be sought, including those in accordance with Policy CP7 Infrastructure and Developer Contributions and Allowable Solutions subject to government exemptions¹⁸³ or a local offset mechanism using this approach.</p> <p>Footnote 183 183 These are part of the measures supporting the Government's 2016 Zero Carbon Homes Building Regulations target. Allowable Solutions present mitigation measures for carbon that will be emitted from development and</p>	As above. These changes will be considered further in the SA of CP8.												

		cannot be addressed on site by fabric performance, energy efficiency or renewables. Allowable Solutions introduce an option for financial payment towards mitigating carbon emissions not addressed on site. The government may exempt certain developments from Allowable Solutions.	
PM087	CP8 Sustainable Buildings, page 162	4.77 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings ¹⁸⁴ . Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and carbon neutral development whilst delivering homes and jobs through development is challenging. The combination of standards with provisions for viability assessments will help address this challenge. This will provide the flexibility needed to ensure the right balance between the economic, environmental and social objectives of the City Plan. The standards set out in this policy are commensurate with the scope of this challenge. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city ¹⁸⁵ .	As above. These changes will be considered further in the SA of CP8.
PM089	CP8 Sustainable Buildings, page 164	4.83 The Building Research Establishment Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes (CSH) are is a widely recognised, accredited, independent methods for assessing environmental performance of non-residential and residential buildings, respectively. These tools will be used to support policy decision making because they cover a wide range of sustainability issues within a simplified score that provides flexibility for developers in meeting standards set in this policy. Successors to these tools and/or Until superseded by national prescribed standards, the BREEAM standards for non-residential buildings will be required. e Equivalent standards by nationally recognised certification bodies may also be accepted ¹⁹⁰ . Any changes to nationally described standards and or revised Building Regulations will be addressed through Part 2 of the City Plan or a review of this Policy. 4.84 An assessment of the energy demand and carbon dioxide emissions will be expected from all residential and proposed major developments, which should	As above. These changes will be considered further in the SA of CP8.

demonstrate the expected energy and carbon dioxide emission savings from energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:

- calculation of baseline energy demand and carbon dioxide emissions;
- **compliance against Part L of the Building Regulations**
- proposals for the reduction of energy demand and carbon dioxide emissions from heating, cooling and electrical power;
- proposals for meeting residual energy demands through sustainable energy measures; and
- calculation of the remaining energy demand and carbon dioxide emissions.

Add after 4.84 following paragraph:

In the case of residential development, evidence must be submitted demonstrating that all dwelling types meet the minimum energy efficiency standard. Until the national Zero Carbon Homes standard is implemented (expected late 2016) the local requirement is for a minimum 19% carbon reduction improvement against Part L compliance. Using methods referred to in 4.84-5, an energy assessment should cover the following:

- **The energy assessment must first establish the regulated emissions assuming the development complies with Part L of the Building Regulations.**
- **For each representative dwelling type, the related 'Target Emission Rate' (TER) is multiplied by the cumulative floor area for that dwelling type to establish the related CO2 emissions.**
- **The CO2 emissions for each dwelling type are then summed to give the total regulated emissions for the development. This should indicate carbon reduction of a minimum of 19% against a part L compliant dwelling for each dwelling type.**

...

4.87 More is asked of larger, new build and greenfield types of development as

		<p>these tend to benefit from economies of scale and easier, cheaper ways in which sustainable design and construction features can be designed in. A growing number of flagship schemes in the UK¹⁹¹ and in Brighton & Hove¹⁹² have demonstrated the viability of such developments. In order to provide clarity and flexibility for developers...</p> <p>Delete footnotes 191 and 192:</p> <p>¹⁹¹See Homes and Communities Agency's Carbon Challenge website.</p> <p>¹⁹²A number of high standard developments have already been achieved under the 2005 adopted Local Plan policy SU2.</p>	
<p>PM119</p>	<p>CP9 Sustainable Transport, page*</p>	<p>4.126</p> <p>In terms of new development, it will be a priority to review and prepare an up to date Supplementary Planning Document (SPD) setting out parking and servicing standards for new development. Car parking standards will be based on maximum standards, and cycle and disabled driver parking will be minimum standards accord with the NPPF and the SPD will also include standards for cycle, disabled driver and motorcycle parking. Consideration will also need to be given to the level of provision of motorcycle parking. Standards and requirements for meeting the needs for new technologies including electric vehicle charging points and opportunities for 'car free' housing proposals will also be addressed in the SPD.</p>	<p>Some modifications to the policy were screened for impacts at Proposed Modifications stage (2014), however the policy was last fully assessed at Submission City Plan stage (2013).</p> <p>Set in the wider context of the policy, it is considered unlikely that this amendment to the Supporting Text will have any significant impact on the previous SA findings. It does not change the general direction of the overall policy, and an SPD on parking standards will</p>

			still be produced. With this amendment, the policy is still anticipated to bring about positive impacts on SA objective 6 (reduction of car journeys). No further assessment of CP9 required,
PM120	CP12 Urban Design, page 185-186	4.150 With regard to adaptability, the government has introduced national technical standards related to accessibility, adaptability and wheelchair standards. Through the City Plan Part 2 the council will seek to introduce a policy to provide enhanced accessibility or adaptability*. this policy requires that new development should comply with Lifetime* Homes standards. Further guidance is set out in the Council's Accessible Housing and Lifetime Homes Planning Advice Note. Amend Footnote 206: *Housing built to standards to cater for various lifestyle stages, e.g. wider corridors to cater for pushchairs and wheelchairs, scope for adaption for disability need, needs of the elderly etc. Optional, enhanced accessibility requirements are set out in Part M of the Building Regulations.	This policy was last assessed at Submission City Plan stage (2013). This amendment is not considered to impact significantly on the SA findings and is still considered to have significant positive impacts upon relevant SA objectives, including 21 (accessibility) and positive impacts on the objective for health. No further assessment required.
PM121	CP15 Heritage, page 192	4.166 The City's rich architectural heritage encompasses... numerous local listed buildings heritage assets and over 80 a-Archaeological sensitive areas-Notification Areas211.	Editorial. No impact on SA. No further SA assessment required of CP15.

<p>PM099</p>	<p>CP16 Open Space, page 194</p>	<p>Planning permission resulting in the loss of open space, including the beach, will not be granted unless will only be granted where:</p> <p>Delete d)</p> <p>d) The site is physically incapable of meeting the city’s wider open space needs; is not part of the beach or a playing field (current or historical) and, in accordance with the Open Space Study Update 2011, is of a poor quality (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered.</p> <p>Replace with:</p> <p>d) The site is :</p> <ul style="list-style-type: none"> • physically incapable of meeting the city’ s wider open space needs; • is not part of the beach or a playing field (current or historical) and, • in accordance with the Open Space Study Update 2011 (or subsequent approved revisions), is of a poor quality without potential for improvement (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered. <p>...</p> <p>Add at the end of section 1:</p> <p><u>e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p>	<p>The change in the first sentence to “will only be granted where” is considered to be more positive than the previous wording, however is not considered to change the impact or assessment of the previous SA findings.</p> <p>The main change in paragraph (d) ...is of poor quality “without potential for improvement” adds further clarity to what is meant by “current and potential” and is not considered to change the impact or assessment of the previous SA findings.</p> <p>No further SA assessment required of CP16.</p>
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PM102	CP17 Sports Provision, page 200-201	<p>... Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:</p> <p>Amend penultimate part to section 2:</p> <p>In respect of <u>outdoor sports facilities and spaces</u>sports open space:</p> <ul style="list-style-type: none"> • The land has been marketed as detailed above and the proposal complies with the Open Space policy (CP16). <p>Add at the end of section 2:</p> <p><u>The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p> <p>...</p> <p>5. Require new development to contribute to the provision and improvement of the quality, quantity and accessibility of sports services, facilities and spaces to meet the needs it generates in accordance with the local standards set out below (or subsequent approved revisions <u>and/or approved assessments/strategies</u>) (See also CP7 Infrastructure and Developer Contributions).</p> <p>...</p> <table border="1" data-bbox="539 1214 1677 1412"> <tr> <td colspan="2">Standard for Indoor and Outdoor Sports Facilities</td> </tr> <tr> <td colspan="2">Indoor Sports</td> </tr> <tr> <td colspan="2">Quantity (indoor sport)</td> </tr> <tr> <td>Modelling undertaken in line with Sport England parameters.</td> <td>The Open Space, Sport and Recreation Study recommends the council should aim</td> </tr> </table>	Standard for Indoor and Outdoor Sports Facilities		Indoor Sports		Quantity (indoor sport)		Modelling undertaken in line with Sport England parameters.	The Open Space, Sport and Recreation Study recommends the council should aim	<p>The change to the penultimate part to section 2 adds further details and clarity to the type of outdoor sports facilities and spaces referred to in this section of the policy, however is not considered to change the impact or findings of the previous SA assessment.</p> <p>The change to part (5), will allow for approved assessments/strategies to be taken into consideration when determining the contribution new development is required to make. This change is not considered to change the impact or findings of the previous SA assessment. No further SA assessment required of CP17.</p>
Standard for Indoor and Outdoor Sports Facilities											
Indoor Sports											
Quantity (indoor sport)											
Modelling undertaken in line with Sport England parameters.	The Open Space, Sport and Recreation Study recommends the council should aim										

		Standards to comply with national best practice.	to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility Plan for further recommendations).		
		Accessibility (indoor sport)			
		Standards to comply with national best practice.			
		Quality (indoor sport)			
		All facilities should be built or provided in accordance with national best practice			
		Outdoor Sports			
		Quantity (outdoor sport)			
		Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ²¹⁵
		Approx 118.5 Hectares	0.47	0.47	Approx 20 to 23 <u>15.5 to 28</u> hectares
		Accessibility (outdoor sport)			
		20 minute walk time (960 metres)			
		Quality (outdoor sport)			
		Clean, litter-free sports facilities should be provided with appropriate, well drained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.			
		Standard for Indoor and Outdoor Sports Facilities			
		All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.			

		<p>Amend footnote 215:</p> <p>²¹⁵ <u>Applying a 2030 population figure of 310,900, based on ONS 2012-based Subnational Population Projections, an additional 27.6 hectares of outdoor sport space will be required. However, when the indicative generated demand of the City Plan's housing target of 13,200 residential units is calculated (using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms) an additional 15.5 hectares is required. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in outdoor sport arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. ONS stands for Office for National Statistics. Based on information in the Office for National Statistics 2010-based Sub National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) - initial release of 2011 Census Data. Applying the respective 2030 projection figure of 299,777 an additional 22.9 hectares will be required however on the assumption that the City Plan housing targets will restrict the growth in population to 292,886 this will reduce the additional outdoor sport requirement to 19.66 hectares. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).</u></p>	
<p>PM106</p>	<p>Policy CP19 Housing Mix, page 209, 210</p>	<p>Amend proposed new criterion a. iii) to the policy:</p> <p>iii) introduce dwelling space Seek to apply the requirements of the nationally described space standards in Part 2 of the plan to secure quality and sustainability in new residential development.</p> <p>Insert new penultimate sentence within paragraph 4.202: 4.202 ... and the need for developments to be inclusive, adaptable and accessible is addressed in CP12 Urban Design. Part 2 of the plan will, subject to evidence of need and impact on viability, include a development management policy relating to requiring the nationally described space standard introduce minimum dwelling space standards, similar to those of the GLA or compatible with those emerging from the government's 2013 Housing Standards Review. This policy and those ...</p>	<p>Policy amended to accord with national policy. Intention of the policy remains to introduce nationally described space standards, however this will be subject to evidence of need and impact on viability. This criteria was introduced to the policy at Proposed Modifications stage. The SA screening undertaken at that stage found it to strengthen the existing strong positive</p>

			<p>impact on the health and housing objectives, however did not change the score from the previous version which did not include the requirement. This further amendment, is therefore not considered to alter the findings of previous SA assessments. No further assessment required.</p>
<p>PM122</p>	<p>Policy CP20 Affordable Housing, page 213, 215</p>	<p>CP20 Affordable Housing</p> <p>The Council will require the provision of affordable housing¹² on all sites of 5 11 or more dwellings (net) (or of more than a combined gross floorspace of 1000sqm)¹³ and will negotiate to achieve the following affordable housing targets:</p> <p>a) 40% onsite affordable housing provision on sites of 15 or more (net) dwellings;</p> <p>b) 30% onsite affordable housing provision on sites of between 10 11 and 14 (net) dwellings or as an equivalent financial contribution;</p> <p>c) 20% affordable housing as an equivalent financial contribution on sites of between 5 and 9 (net) dwellings.</p> <p>¹ The definition of affordable housing is that as set out in the National Planning Policy Framework ² As set out in Para 12 http://planningguidance.planningportal.gov.uk/blog/guidance/planning-</p>	<p>This is a significant change to the policy text.</p> <p>Further SA required to fully consider and assess the impacts.</p> <p>See Appendix B and Section 3 of this report for full assessment.</p>

<p>PM123</p>	<p>Policy CP20 Affordable Housing, page 213, 215</p>	<p>obligations/planning-obligations-guidance/</p> <p>4.218 When setting targets for t The delivery of affordable housing from new development of 11 units or more (as per the requirements of National Policy²⁴³), the city council considers that the most pragmatic approach is to required that all new suitable residential development (as defined with reference to the site size thresholds set out in the policy) to provide a viable and deliverable proportion of affordable housing or (where appropriate) an equivalent financial contribution in lieu of onsite provision which can be used to help enable the further provision of affordable housing elsewhere in the city.</p> <p>4.219 Drawing on the findings of the council’s most recent Affordable Housing Development Viability Study¹⁴²⁴⁴ and taking account of a number of considerations (for example, the city’s housing land supply, housing market trends, local needs and affordability, together with wider planning obligations) the council will aim to achieve onsite provision of affordable housing on all suitable larger development sites (40% on sites of 15 units or more and, where practicable, 30% on sites of between 10 11 and 14 units). and a financial contribution equivalent to a lower target quota of 20% on smaller development sites of between 5 and 9 units.</p> <p>²⁴³ http://planningguidance.planningportal.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/</p> <p>²⁴⁴ Affordable Housing Development Viability Study, March 2012.</p>	
<p>PM108</p>	<p>CP21 Student Accommodation and Houses in Multiple Occupation, page 219</p>	<p>4.225 The city’s educational establishments and their students make an important contribution to the economic and cultural life of the city. There are approximately 35,200 37,000 students at the Universities of Brighton and Sussex, which includes 4,000 5,200 international students from non EU countries[#] 150 countries. Many students also attend...</p> <p>Insert new footnote:</p> <p><u># HESA 2011/12</u></p>	<p>This change to supporting text should reduce the potential for adverse impacts on existing residents resulting from purpose-built student housing schemes. It is not considered to change the impact or findings of the previous SA findings.</p>

		<p>Add before penultimate sentence in 4.227</p> <p><u>In considering the effect of new development on residential amenity, this will include an assessment of the cumulative impact of other existing and proposed purpose-built student housing schemes close to the application site.</u></p>	<p>No further SA required of CP21.</p>
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Other Proposed Modifications relate to the Annexes and are considered to fall outside the scope of the Sustainability Appraisal

Appendix B – Re-appraisals of The Spatial Strategy, CP1, CP8 and CP20

The Spatial Strategy

Changes from last assessment highlighted in bold text

SA Objective	Summary of effects	Short	Medium	Long term
1) Protect and enhance biodiversity	Development within the existing built up area will involve development on urban brownfield sites, some of which may have some biodiversity value, or on sites in close proximity to sensitive environments. Development on urban fringe sites may also have some adverse impacts on existing biodiversity. The significance of the impacts would need to be assessed as part of a planning application. It is likely that the adverse impacts could be overcome with mitigation as suggested by the urban fringe assessment, which directs development to sites with lower biodiversity value. The Habitats Regulations Assessment Screening 2014 indicates that there would not be any adverse effect on the integrity of a European site from the proposed development levels of the City Plan Part 1, with proposed modifications.	-	-	-
2) Improve air quality	Majority of development directed to the built up area where access to existing modes of sustainable transport are good. This may positively impact upon car ownership and transport choice. However some of the urban area is located within the AQMA 2013, within which air quality has shown little improvement over the last 10 years and the amount of cars owned locally is likely to increase with the delivery of 13,200 new homes, in addition to increasing levels of other development. The scale of development anticipated at Toads Hole Valley may have slight localised air quality impacts, and require more car journeys to be made due to its location, although air quality in this location is currently good. Delivery of an additional 1,060 housing units across the urban fringe may also have slight localised impacts, however are unlikely to be significant as air quality in these locations is currently good.	-	--	--
3) Maintain local distinctiveness	Development within the built up area has potential for adverse impact on heritage assets and their settings, although could improve areas where townscape and streetscape is currently poor. Development within the built up area will increase the pressure on the existing open space resource and it is considered unlikely that the increasing open space needs of the increased population will be met. Development on urban fringe sites could result in a net loss or a net gain in publically accessible open space. This depends on their current ownership, whether they currently form part of the assessed open space standards, and whether the development will incorporate new open space provision. Overall there is likely to be a total net loss of open space in the urban fringe.	--/+	--/+	--/+
4) Protect South Downs	Sites on the urban fringe have been identified as suitable for development. Some of these	-	-	-

SA Objective	Summary of effects	Short	Medium	Long term
	sites act as a buffer between the built up area and the South Downs National Park and may impact upon the landscape character of the SDNP although the results of the UFA suggests these can be mitigated against, or have included only sites where impacts are not considered to be adverse. Site within the built up area can also adversely impact upon the SDNP, or of views of or from the Downs.			
5) Provide decent, affordable housing	The Strategy will result in delivery of housing and is therefore considered to be positive towards this objective. The option will result in affordable housing and types of housing that are known to be required locally, e.g. potential for family type housing in the urban fringe location. However, the OAN has been assessed in June 2015 as 30,120 over the plan period. Delivery of 13,200 homes is equivalent to 44% of the OAN, with the percentage shortfall increased since Proposed Modifications stage. A lack of housing supply can result in various adverse impacts such as over-crowding, increasing housing in-affordability, reduced competition in the housing market (e.g. keeps rental prices high), and reduced social mobility (e.g. young people living at home for longer and older people unable to downsize). All of these are existing local issues, which may be exacerbated further. Overall, the impacts are considered to be mixed.	-/+	-/+	-/+
6) Reduce amount of car journeys	Majority of development directed to the built up area where access to existing modes of sustainable transport are good. This may positively impact upon car ownership and transport choice. However the amount of cars owned locally is likely to increase with 13,200 new homes, in addition to increasing levels of other development. The scale of development anticipated at Toads Hole Valley likely to have some local transport related impacts and require more car journeys or result in higher than average car ownership levels due to its location. Delivery of 1,060 housing units across the urban fringe may also have slight localised transport impacts and may result in a higher than average car ownership levels due to their location. The Transport Assessment Update suggests that mitigation and intervention will be required throughout the city to ensure the road network continues to operate, however that the morning peak time in particular will see an increase in trips and traffic congestion, despite mitigation.	-	--	--
7) Minimise risk of pollution to water	Increased urbanisation throughout the city could increase the risk of surface water flooding, with many areas of the city assessed through the SFRA as having some element of surface water flood risk. Currently the Water Framework Directive status of the aquifer is poor, and development throughout the city could harm any improvement to this status. In addition, many sites within the city fall within either a zone 1 inner, zone 2 outer or zone 3 catchment groundwater source protection zone. Open space performs a natural function in respect of absorption of water. Loss of any type of open space on the urban fringe may increase the risk of surface water flooding elsewhere. Development on the urban fringe could also impact on the recharge of the aquifer which underlays the city and is an important source of public water supply.	-	--	--
8) Minimise use of water	The strategy will result in an increase in local population, which will result in an increase in water consumption. The greater the population, the greater consumption will be. It is	-	-	--

SA Objective	Summary of effects	Short	Medium	Long term
	acknowledged that the standards applicable to new residential development will ensure that water consumption is minimised, however it is understood that there are no longer any additional requirements to achieve higher standards on Greenfield sites.			
9) Promote development of contaminated land	Development within the urban area has potential for remediation of contaminated land and will depend on the site developed. Although there are sites within the urban fringe that are known to be significantly contaminated due to former uses (e.g. Sheepcote Valley) it is considered unlikely that these will be brought for development prior to other sites mainly due to the costs involved with remediation and the impact this will have on viability.	?	?	+?
10) Manage coastal defences	The strategy will result in delivery of housing in coastal locations (DA2 and DA8) that have been assessed by the SFRA as high risk of coastal flooding (Level 3a)	-	-	-
11) Employment: balance needs of tourists, residents and businesses	Delivery of housing and house-building is strongly linked to economic growth. This option will result in temporary construction-related jobs and permanent service-sector jobs to meet the needs of an increased population, as well as additional local workers to help meet the forecasts in economic growth. Strategy also sets out that employment and retail will be delivered across the city, and also directed to the main development areas.	+	++	++
12) Support economic development	See objective 11.	+	++	++
13) Improve health	The strategy will deliver housing, including affordable housing and will make a significant contribution towards meeting the city's housing requirements. This strategy is likely to deliver greater levels of family-type housing, for example in the urban fringe location. This strategy does not meet the OAN and could therefore exacerbate the issues such as over-crowding and inaffordability and this risk is considered to be greater with the updated OAN. The Strategy will result in deliver of employment opportunities, which is also a determinant of health. This strategy will result in loss of open space on the urban fringe, some of which is accessed for recreation purposes which has strong links to health. The loss of this open space may have some localised impacts on the health of adjacent communities, as well as potentially reducing the ability to meet the accessibility standards for certain types of open space (particularly Natural/Semi-Natural) in the west of the city in particular. However, it is recognised the land area with development potential across the urban fringe equates to 8% of the urban fringe total area, with the vast majority remaining as different types of open space.	-/+	-/+	-/+
14) Integrate health and community safety	No direct impact.			
15) Narrow the gap between deprived areas and rest of the city	The strategy will result in the delivery of housing, which will have positive impacts on reducing housing based deprivation and will create job opportunities, both having positive impacts on deprivation, although will depend on take up by existing deprived communities. The extent of the housing shortfall however could impact adversely on this objective with quality and	-/+?	-/+?	-/+?

SA Objective	Summary of effects	Short	Medium	Long term
	<p>availability of housing linked strongly to health and deprivation.</p> <p>The strategy results in a 7.5% loss of open space situated on the urban fringe. Access to open space has been linked to reducing health inequalities, with access to open space benefiting all communities but benefitting deprived communities the most (Natural England 2012). It is these communities where long term health conditions such as obesity, heart disease and diabetes are more prevalent, particularly in those that have no or limited access to green open space. In some cases, these urban fringe sites are adjacent to some of the city's deprived communities and in these cases loss of this open space could result in a widening of health inequalities, although it is recognised that with improved access, open space within the SNDP could be utilised readily by these communities. The impacts are therefore considered to be mixed.</p>			
16) Engage local communities	The strategy will provide opportunities to engage with local communities. Additional engagement would be likely resulting from housing development in the urban fringe location.	++	++	++
17) Make the best of previously developed land	The strategy directs the majority of development to the built up area and therefore it can be assumed that the best use of previously developed land will be made in this location. It is understood that the need for development is due to the need to meet the increasing housing need, and is in addition to and not instead of developing within the built up area, and therefore this does not mean that the best use of land within the built up area has not been made.	+	+	+
18) Sustainable energy	The strategy will result in new development, will result in an increase in local population, which will result in an increase in energy consumption. The greater the population, the greater consumption will be. It is acknowledged that the standards applicable to new residential development will ensure that energy consumption is minimised, however it is understood that there are no longer any additional requirements to achieve higher standards on Greenfield sites.	-	-	-
19) Taking account of the changing climate	The strategy involves development along the coastal frontage in areas at higher risk of coastal flooding, which is likely to increase as a result of climate change. It also involves the loss of Greenfield sites on the urban fringe. Open space will play an increasingly important role in adaptation to climate change, with open space helping to absorb water, therefore reducing flood risk but also maintaining water supply, and also help to maintain urban temperatures and have been documented to reduce urban temperatures by 1-2 degrees Celsius.	-	--	--
20) Meet BREEAM /Code for Sustainable Homes	No direct impact on this objective.			
21) Increasing accessibility	Development within the built up area will have good access to existing employment opportunities, as well as other services and facilities. 85% of the housing is located within the built up area. Loss of open space within the urban fringe will reduce access to open space. In addition, housing distributed throughout the urban fringe may have limited access to services and a wide	-/++	-/++	-/++

SA Objective	Summary of effects	Short	Medium	Long term
	distribution on small sites may not result in associated local services.			
22) Reduction of waste	The policy will result in an increase of waste, associated with the increased population.	-	-	--

Policy CP1 – Housing Delivery

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The policy will result in housing development throughout the city, some of which will be at high density and some of which will be on Greenfield sites, including 1060 units on the urban fringe. Housing development anywhere in the city has potential to harm biodiversity existing on site and will be dependent on the actual site developed. However development also provides the potential to enhance biodiversity through incorporation of biodiversity features, although as a general principle, the denser the housing development the less opportunities there are for incorporating biodiversity into the design.</p> <p>It is likely that housing development located on Previously Developed Land could mitigate any negative impacts through incorporation of features to attract biodiversity, such as green roofs or green walls or through site specific design, e.g. avoidance of shading and potentially provide for net gains in biodiversity.</p> <p>Housing at DA7 Toads Hole Valley and other urban fringe sites, which are Greenfield sites has potential to have adverse impacts on biodiversity. It is understood that the urban fringe sites or parts of sites identified as having potential for housing in the Urban Fringe Assessment do not include those of highest ecological value (e.g. SACs, SSSIs). In addition, the Assessment has only identified sites or parts of sites that do not include, for example, rare species, or those designated as SNCIs. The potential for adverse impacts on biodiversity are therefore not considered to be significant, however overall, the impacts are considered to be negative and uncertain and will require mitigation.</p> <p>The Appropriate Assessment screening (2014) tested whether the amount of housing to be delivered would affect European Sites (SACs) particularly through increased recreational pressure, increased traffic and air pollution, and increased resource use, such as water. The Appropriate Assessment concludes these effects have been discounted and are not considered to effect the integrity of any European site.</p> <p>CP8 and CP10 should ensure effect of housing is positive and enhances biodiversity. Any planning application will be required to meet the requirements of SPD11 (Nature Conservation and Development), which will address impacts on biodiversity.</p>	-?	-?	-?
2) Improve air quality	<p>Delivery of 13,200 homes could result in over 11,000 more cars owned within the city (based on 0.86 cars/household, Census 2011). This amount of additional cars, and associated journeys is likely to have an adverse impact on air quality. Approximately 85% of housing is located within the built-up area and this may positively influence decisions on car ownership/journey choice. However, part of the city is designated as an AQMA and location</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>of housing within more accessible locations within the AQMA could still adversely impact upon air quality. Housing located within the urban fringe, which generally has better air quality than central areas, is currently less accessible by sustainable transport means, as identified in the Strategic Transport Assessment 2014. This could impact on travel choice, result in more journeys being made by car in the area unless public transport interventions are implemented, and may have some localised air quality impacts, although these are considered to be negligible in the wider context.</p> <p>This policy may also result in in-commuting, due to less housing being delivered than needed to meet forecasted economic growth, as well as due to the shortfall in OAN although this will be limited by the amount of economic growth the city can accommodate, which could also add to air quality issues.</p> <p>The Development Area policies and CP9 Sustainable Transport should ensure that the majority of development is situated within areas of good transport links, and ensure that development schemes respond to the demand for travel that they create, and implement various transport interventions to reduce less sustainable modes of transport. In addition, transport impacts of all development will be assessed at planning application stage.</p>			
3) Maintain local distinctiveness and sites	<p>The majority (85% of development) is located within the built up area. Development in this location could impact on the existing townscape, including heritage assets. However, CP12 should ensure the effect is positive and that development achieves high standards of urban design. It is assumed that tall buildings will only be built in areas that have been assessed as having potential to accommodate tall buildings and therefore won't have an adverse impact on any local sites or the character of neighbourhoods.</p> <p>Development within the urban fringe will incorporate loss of open space, some of which is publically accessible and some of which is privately owned. Development on public open space that forms part of the assessed quantity is an absolute loss of open space and goes against the recommendation of the Open Space Study. Development on private open space that was not part of the assessed quantity could result in a net gain if open space is included as part of a scheme (e.g. as with Toads Hole Valley). However, it is unlikely that this net gain in open space will outweigh the loss. The loss of open space of certain typologies (in particular Natural/Semi-Natural) in the west of the city will make it even harder to meet the locally assessed need for accessibility, as well as make it more difficult to meet Natural England's ANGst Standards.</p> <p>The amount of development associated with this option will increase the local population, and this creates a greater need for open space provision to meet the increased population (i.e. an additional 13,200 homes would result in 167ha of additional open space being required to meet the increased total population's needs). It is considered unlikely that the increased population's open space needs will be met due to competing land requirements.</p>	--?	--?	--?

SA Objective	Summary of effects	Short term	Medium term	Long term
4) Protect South Downs	<p>Housing development situated either within the built up area, or near the boundary of the SDNP, particularly tall buildings has potential to have an adverse impact on the views from or of the Downs. In addition, delivery of 1060 homes on sites or parts of sites across the urban fringe, in addition to those at Toads Hole Valley, could also have an adverse impact on the setting of the SDNP depending on how development is delivered. It is understood that the urban fringe sites or parts of sites identified in the Urban Fringe Assessment do not include those where a significant adverse impact on the landscape would occur. Therefore the adverse impact is not considered to be significant, however overall, the impacts are considered to be negative and uncertain.</p> <p>Any development located on the urban fringe would need to be of low density to ensure that any significant negative impact in terms of views from the Downs are reduced as far as possible as well as to reflect the character of the adjacent neighbourhoods, and incorporate screening where appropriate to maintain the existing landscape character.</p>	-?	-?	-?
5) Provide decent, affordable housing	<p>This policy will result in delivery of housing and is therefore considered to be mainly positive towards this objective. The policy will result in affordable housing and types of housing that are known to be required locally, e.g. potential for family type housing in the urban fringe location.</p> <p>However, the updated OAN published in June 2015 in the “Objectively Assessed Need for Housing: Brighton & Hove” has increased to 30,120. Delivery of 13,200 homes is equivalent to 44% of the OAN leaving a shortfall or 56%.</p> <p>A lack of housing supply can exacerbate existing issues such as over-crowding, housing in-affordability, reduced competition in the housing market (e.g. keeps rental prices high), and reduced social mobility (e.g. young people living at home for longer and older people unable to downsize). Therefore, although 13,200 new homes is a significant increase in housing stock, overall the impacts on this objective are considered to be mixed. Ongoing negotiations through the Duty to Cooperate will be required to assist with meeting this housing need and it is recognised that the supporting text refers to this.</p> <p>The significance of the shortfall is anticipated to increase in the long term. This is based on the likelihood that the OAN and therefore the shortfall will increase over time, based on past and future population trends. This could have greater transboundary impacts as the pressure to find an alternative location outside the city’s boundaries to meet local housing need increases.</p>	-/+	-/+	--/+
6) Reduce amount of car journeys	<p>Delivery of housing is likely to result in increased levels of car ownership and potentially journeys made by car. Delivery of 13,200 homes could result in around an additional 11,000 new cars owned in the city (based on Census data of 0.86 cars per household) and an increase in trips made by car and public transport (as concluded in the Strategic Transport Assessment). Delivery of housing within the built up area will enable people to make sustainable transport choices more easily, due to proximity to sustainable transport, whereas housing delivered on the urban fringe may lead to more journeys made by car due to the</p>	-	--	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>location and would require investment in public transport and improvements to access, as described in the Strategic Transport Assessment.</p> <p>Based on the Experian Projections of 12% economic growth, the Housing Requirements Study 2012 suggested that an increased population associated with approximately 15,000 homes would be required to meet this forecasted growth in employment. This suggests that the housing target of 13,200 homes may result in some in-commuting for employment purposes. The increase in the OAN may also result in some in-commuting, although this will be limited by the amount of economic growth the city can accommodate.</p> <p>It is recognised that the majority of Development Areas are located in proximity of existing public transport, therefore reducing the potential for negative impact, however should new housing incorporate provision for parking, then car use is unlikely to be discouraged and therefore strong controls on parking should be promoted where possible, including car free housing for suitably located development. Additional measures as described in the Strategic Transport Assessment will also be required to minimise the potential for adverse transport impacts from development, including that in the urban fringe, such as improved public transport, walking and cycling facilities, as well as personal travel planning and behaviour change campaigns will be required.</p> <p>CP9 should contribute towards ensuring that development is situated within areas of good transport links, and ensure that development schemes respond to the demand for travel that they create.</p>			
7) Minimise risk of pollution to water	<p>Any development has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution and will be dependent on the site developed. Currently the Water Framework Directive status of the aquifer is poor, and development could harm any improvement to this status. In addition, many sites within the city fall within either a zone 1 inner, zone 2 outer or zone 3 catchment groundwater source protection zone. The closer the activity to the source, the greater the risk of contamination. Development at DA7 and across sites or parts of sites within the urban fringe could have a significant negative impact, as any sites that are of a more natural form will have an important role in absorbing water as well as potentially recharging the Brighton Chalk Aquifer and this would need to be investigated further as part of development proposals. The actual impacts of development would need to be assessed on a site by site basis.</p> <p>CP8 and CP11 should ensure that appropriate systems are in place to reduce risk of surface water flooding. In addition, groundwater protection is addressed through SA4. Development on Greenfield sites should ensure surface water run-off is maintained at Greenfield rate through incorporation of features such as SUDS.</p>	-	--	--
8) Minimise use of water	<p>Delivery of 13,200 new homes will substantially increase water consumption in the area, even with substantial measures to minimise water consumption and increasing standards</p>	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	relating to water consumption. CP8 should ensure that water consumption is minimised as far as possible.			
9) Promote development of contaminated land	There is no direct link to this objective. New housing development offers the potential to remediate contaminated land, however this is uncertain.	?	?	?
10) Manage coastal defences	Coastal defences could be jeopardised through inappropriately located development and increased risk of coastal flooding could occur through development in coastal locations. Development at DA7 will have positive benefits for this objective due to its location, however overall the majority of housing will be within the built up area, with 2,240 units built within DA2 and DA8 which are situated by the coast on the coastal frontage and in areas of higher flood risk. CP11 should ensure that development is only located in appropriate locations and that site based flood risk assessments are carried out where needed.	-	-	-
11) Employment: balance needs of tourists, residents and businesses	Delivery of housing and house-building is strongly linked to economic growth with the equivalent of 2 jobs created for a year per every house built (DCLG analysis). The policy will therefore result in positive impacts through temporary construction-related jobs and permanent service-sector jobs, as well as jobs in healthcare and education and other sectors to meet the needs of an increased population. Based on Census 2011 data and a ratio of 1.15 workers (in all sectors) per household, this option could result in an increase of around 15,000 workers (across all sectors).	+	+	+
12) Support economic development	As with objective 11, temporary job creation at construction phase will benefit the local economy, as well as through jobs created through increased services required. Delivery of housing and house-building is strongly linked to economic growth. It is uncertain whether not meeting the full housing need will have any impacts on economic development. National studies indicate that in strong economic cities, lack of housing supply can constrain economic growth by restricting labour market mobility and exacerbating skills shortages. However, this varies from city to city and there has been no local assessment of this to draw upon. Overall, impacts are still considered to be positive.	+	+	+
13) Improve health	Access to decent, affordable housing is one of the wider determinants of health. This policy will deliver housing including affordable housing which makes a positive contribute towards meeting the city's housing requirements. However, not meeting the OAN could exacerbate existing local issues such as increased house-prices, increased inaffordability and increased rates of over-crowding, all of which have an impact on health. The policy will result in loss of open space on the urban fringe, some of which is accessed for recreation purposes, which has strong links to health. The loss of this open space may have some localised impacts on the health of adjacent communities, as well as potentially reducing the ability to meet the accessibility standards for certain types of open space (particularly Natural/Semi-Natural) in the west of the city in particular. However, it is	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>recognised that the amount of open space from the urban fringe assessed to have development potential is equivalent to only 7.5% of the total urban fringe, therefore effects are likely to be minimal.</p> <p>Overall the impacts associated with this option are considered to be mixed.</p> <p>Any proposals for strategic developments would incorporate a Health Impact Assessment, and CP18 is recommended to be strengthened (where HIA is not applicable) in order to ensure there are no adverse health impacts on existing adjacent communities from development.</p>			
14) Integrate health and community safety	Indirect impact. New housing development can contribute towards improving community safety through incorporating design features to design out crime. (See CP12).	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>This policy will result in the delivery of housing, which will have positive impacts on reducing housing based deprivation and overall deprivation, with the Housing domain making up approximately 9% of the weighting for the overall deprivation (Index of Multiple Deprivation). This policy will also result in employment opportunities, which may also help reduce income and employment deprivation. Whether the delivery of housing will have positive impacts on existing deprived communities is considered to be unknown and will depend largely on whether new housing and other opportunities benefit existing communities.</p> <p>This policy results in a 7.5% loss of open space situated on the urban fringe. Access to open space has been linked to reducing health inequalities, with access to open space benefiting all communities but benefitting deprived communities the most (Natural England 2012). It is these communities where long term health conditions such as obesity, heart disease and diabetes are more prevalent, particularly in those that have no or limited access to green open space. In some cases, the urban fringe sites identified are adjacent to some of the city's deprived communities and in these cases loss of this open space could result in a widening of health inequalities.</p> <p>Overall the impacts are considered to be mixed and uncertain.</p> <p>The SA recommends that CP18 is strengthened to ensure that development on the urban fringe addresses any adverse impacts on the health of adjacent communities.</p>	-/+?	-/+?	-/+?
16) Engage local communities	Communities will have the opportunity to be engaged with the planning process, through development control procedures. In addition, the Site Allocations stage is likely to involve significant consultation, including consultation on urban fringe sites. Significant community engagement would also be anticipated for development of DA7.	+	+	+
17) Make the best of previously developed land	<p>Previous trends indicate that a high proportion of housing has been built on PDL. It is likely that all housing delivered in the development areas, will be on PDL. In addition, housing development situated on major development sites within development areas (with the exception of DA7) is expected to achieve a minimum density of 100dph.</p> <p>Housing delivered at DA7, and on other urban fringe sites, will be on greenfield land, however this in itself does not mean that the best use of previously developed sites in the</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	city has not been gained, with 85% of housing development being directed to PDL.			
18) Maximise sustainable energy	New development has potential to increase consumption of energy, therefore contributing towards climate change. CP8 requires all new residential development to achieve zero carbon status and sets various other requirements. In addition, the government requires all new homes to be zero carbon by 2016 meaning that the impact is more likely to be positive in the medium to long term.	-	+	+
19) Taking account of the changing climate	New development could be unsustainable and be of limited longevity if it does not incorporate measures or features to enable it to withstand extremes of temperatures and weather conditions associated with climate change, thereby having the potential to have a negative impact on this objective. In addition, it is recognised that some of the development areas are located in coastal locations, with flood risk increasing as a result of climate change in the long term. The loss of Greenfield urban fringe sites could potentially exacerbate problems caused by periods of increased heavy rainfall and increased temperatures associated with climate change through the increase in impermeable surfacing that is unable to absorb water, with this considered to become more significant in the long term. Development in these locations should therefore incorporate significant SUDS. All new development, including residential and mixed use will be required to meet the requirements of CP8, which include contributing to minimising the urban heat island effect through off-site tree-planting, which will help in adaptation to climate change.	-	-	--
20) Meet BREEAM / Code for Sustainable Homes	New development could fail to meet high environmental standards having a negative impact on the residents (e.g. through higher energy/water bills) as well as the wider environment. Greenfield development is no longer required to meet higher environmental standards. Amended CP8 currently requires new developments to meet various standards, in accordance with national standards.	-	-	-
21) Increasing accessibility	Inappropriately located development could severely impact residents' access to various services, including transport, food and health facilities. However the Development Area policies as well as SA6, CP12, CP13, CP18, and CP9 should ensure that access to services is met. Development at DA7 and on other urban fringe sites, would not increase accessibility to services, and investment in public transport would be necessary, as well as ensuring that there are local amenities and services to meet residents basic needs. In addition, loss of open space within the urban fringe will reduce access to open space and may impact on the open space accessibility standards in some areas. Overall, the impacts are considered to be mixed.	-/+	-/+	-/+
22) Reduction of waste	Housing development highly likely to create an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	minimised.			

Policy CP8 – Sustainable Buildings

Changes to text from the previous assessment shown in bold font

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impact. The policy is likely to have a positive impact on biodiversity, as the policy requires all developments to demonstrate how they will enhance biodiversity. In addition, the policy includes the requirement for developments to reduce the heat island effect, which can be achieved through planting, and requires developments to encourage food growing, which would also have positive impacts on biodiversity. In addition, meeting various requirements of BREEAM will also ensure the consideration of biodiversity, with impacts considered to become more significant in the medium to long term. However, the removal of the requirement for residential development to meet certain levels of Code for Sustainable Homes may have an impact on this objective as residential development would previously been required to meet certain issues under the “Ecology” subject of CSH. Removal of this quality assurance check is difficult to measure, but despite the other policy requirements that are still in place relating to biodiversity, removal of the CSH requirements is considered to reduce the impact from significantly positive to positive.	+	+	+
2) Improve air quality	Direct impact. The policy is likely to have a positive impact on improving air quality, as the policy requires development to demonstrate how they will reduce air pollution. In addition the requirements of BREEAM will also ensure that air pollutants are minimised (e.g. NOx from heating systems) as well as includes sections on Transport , which would have an indirect impact. The removal of the requirement for residential development to meet certain levels of Code for Sustainable Homes may have an impact on this objective as previously residential development would have been required to meet certain issues under the “Pollution” subject. However, overall the impact of the policy should still ensure positive impacts are achieved.	+	+	+
3) Maintain local distinctiveness and sites	There is no direct link with this objective.			
4) Protect South Downs	There is no direct link with this objective.			
5) Provide decent, affordable housing	The costs of building highly sustainable homes may conflict with the viability of providing housing, including affordable housing. However, it is now recognised that the		+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>environmental building standards required to be achieved for residential development have been reduced, to bring them into accordance with national policy requirements. This means that the costs to developers may be lower and potentially mean that residential development is more viable/profitable. The change in the standards required, in addition to the existing policy text that states viability of a scheme will be considered, resulted in a change from the score of adverse impact (at Submission stage) to negligible impact (at Proposed Modifications stage) on this objective.</p> <p>The policy now refers to the exemption from Allowable Solutions. The Written Ministerial Statement 2015¹⁵ indicates that this will be for small sites, however this has not been finalised as policy as yet. The consultation document on this change stated the government was still committed to implementing the Zero Carbon Homes standards, but wanted to release small sites from the full costs of delivering the standards. The removal of this requirement could have a positive impact on house-building in the medium to long-term through reduced building-costs, which may help to bring forward smaller housing sites, however this is considered to be highly uncertain.</p>			
6) Reduce amount of car journeys	Indirect impact. The policy is likely to have a positive impact on this objective, as BREEAM standards includes a section on Transport.	+	+	+
7) Minimise risk of pollution to water	The policy is likely to have a positive impact on minimising the risk of pollution to groundwater, as the policy requires development to demonstrate how they will reduce surface water run-off and should help to meet the requirements of the Water Framework Directive. The policy also requires development to safeguard water resources if located within a groundwater source protection zone, and this is considered to result in a significantly positive score.	++	++	++
8) Minimise use of water	The implementation of the national technical standard for water will help to ensure water usage in residential development does not exceed 110l/p/day as a minimum. This is an improvement on the 2012/2013 local average metered consumption of 132l/p/day and this should therefore achieve positive impacts for this objective. The need to minimise water consumption as much as possible of particular importance locally given the South East has been designated as a water stressed area.	+	+	+

¹⁵ <https://www.gov.uk/government/speeches/planning-update-march-2015>

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>However, it is noted that although this standard is set as a minimum, it is still lower than previous iterations of the policy. The removal of the requirement for residential development to meet specific standards of Code for Sustainable Homes is therefore likely to have implications on water use. CSH4 required development to achieve 110l/p/day, CSH5 required development to achieve 80l/p/day whereas the optional technical standard for water now included in the policy only requires the achievement of a minimum 110l/p/day. This is the equivalent to CSH2. Locally, the target for CSH3 (105l/p/day) is routinely being achieved from new residential development.</p> <p>The impact of this policy is still considered to be positive, but has changed from being significantly positive (from the Submission/Proposed Modifications stages) in the medium to long-term; with the difference between the national standard for water and CSH5 being 30l/p/day.</p> <p>It is recognised that the policy already includes policy requirement (d) for development to “aspire” to water neutrality by incorporating facilities to recycle, harvest and conserve water resources, however the policy does not require this to be achieved, as it is only an aspiration. It is also difficult to know how this policy requirement will be implemented in combination with the national technical standard which does not require this.</p>			
9) Promote development of contaminated land	Policy criterion K requires development to reduce land pollution. This could have positive implications towards this objective.	+	+	+
10) Manage coastal defences	There is no direct link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	There is no direct link to this objective.			
12) Support economic development	The policy indicates that there will be exemptions from the Allowable Solutions component of the Zero Carbon Homes requirements. This is still yet to be finalised by DCLG, however the Written Ministerial Statement suggests this will be an exemption for small sites (less than 10 units of housing). When		+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>introduced, the exemption could have positive implications for economic growth, with house-building being strongly linked to economic growth, as may reduce costs on some sites and may help to bring forward development, however this is considered to be highly uncertain at this stage.</p>			
13) Improve health	<p>Indirect impact. The policy is likely to have a positive impact on health through enhancements to biodiversity and encouragement of food growing which can improve health and well-being; through improvements to air quality; through consideration of health through site design; through protection of groundwater resources through reducing surface water run-off; and through minimising the wider health issues associated with climate change through potential reductions in carbon emissions. In addition, BREEAM includes a section dedicated to health and wellbeing. The removal of the requirement for residential development to meet certain levels of Code for Sustainable Homes may have an impact on this objective, particularly as one of the CSH categories covered Health & Well-being”, however the other policy requirements that are still in place should ensure significant positive impacts are achieved.</p> <p>The policy indicates that an exemption from Allowable Solutions requirements will be introduced. The exemption is likely to have an impact on the amount of funding available, and as the Allowable Solutions scheme would have enabled energy efficiency improvements to take place on existing building stock, it could potentially have an impact on fuel poverty, which could have been reduced through energy efficiency improvements.</p> <p>All housing will still be required to meet minimum strengthened fabric energy efficiency standard (Written Ministerial Statement suggests this will be equivalent to CSH4) and this should ensure that new housing is energy efficient, helping to reduce the possibility of fuel poverty in new developments, although if only the minimum is achieved, this is not as strong as the previous policy position.</p> <p>Although the specific requirements to meet certain standards for Code for Sustainable Homes have been removed, and the exemption for certain sites from</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	Allowable Solutions has been introduced, this is not considered to significantly change the assessment score for this objective, due to the range of other policy requirements under (a) to (o) all of which in combination are likely to have significantly positive implications for health.			
14) Integrate health and community safety	There is no direct link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	<p>Indirect impact. The policy is likely to have a positive impact on this objective, through the potential to reduce risk of fuel poverty in new development, as well as through the potential for energy efficiency improvements to existing housing stock, through the Allowable Solutions scheme. In addition, the requirements for development to connect to or make a contribution towards decentralised energy schemes, such as district heating could also reduce fuel poverty.</p> <p>It is recognised that this iteration of the policy is not as strong as the previous version due to the Government's intention to exempt certain sites from the Allowable Solutions scheme. This is likely to reduce the amount of funding that can be pooled to fund improvements to existing housing stock, and will also have a particular impact locally where a large proportion of residential developments are on smaller sites (55% of housing delivered on small sites between 2002-2014).</p> <p>It is recognised that exempt sites will still be required to meet the strengthened fabric energy efficiency standard, however this is not as high as the previous iteration of the policy.</p> <p>Overall, the policy is still considered to have an indirect positive impact on deprivation, however this is considered to be more uncertain in the medium to long term due to the changes in the Allowable Solutions scheme, which are likely to have an impact on improvements to existing building stock locally.</p>	+	+?	+?
16) Engage local communities	There is no direct link to this objective.			
17) Make the best of previously developed land	Direct impact. The policy is likely to have a positive impact on this objective, as the policy requires developments to demonstrate how they will make the most effective use of land.	+	+	+
18) Maximise sustainable energy and mitigate the	The policy has been amended to ensure it reflects changes to national policy. There are two key changes to the policy and supporting text that are considered	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
impacts of climate change.	<p>to impact on this assessment. 1) Removal of CSH targets and 2) Allowable Solutions Exemptions. Both are considered separately.</p> <p>Removal of CSH targets: The policy requirements relating to energy efficiency are (2013-2016) to make a 19% improvement on Part L 2013. This is known to be equivalent to CSH4 standards for energy efficiency and is therefore not considered to have any impact on the short-term score, as is reflective of the previous policy position. Post 2016, development is required to meet “zero carbon homes” standard. At the time of writing, this actual standard has not been defined, but will incorporate meeting a certain minimum standard of Building Regulations, plus the Allowable Solutions element that will allow off-site carbon abatement measures if the full zero carbon homes standard cannot be met on-site. However the Written Ministerial Statement¹⁶ indicates that the minimum energy performance of buildings to be set in Building Regulations from 2016 will be the equivalent to CSH4. Although this is a minimum and if zero carbon standards are not met then schemes over a certain size will have to contribute to Allowable Solutions which will positively influence the energy efficiency of existing housing stock, this is not considered to be as strong as the previous policy position that required CSH5 to be met in full and would have been the equivalent of 100% improvement in energy/carbon improvement. This is considered to impact on the score in the medium to long term.</p> <p>Introduction of Allowable Solutions Exemption: The exemption from Allowable Solutions has not yet been defined in government policy, however it is likely that small developments, i.e. those delivering less than 10 units, will be exempt from this part of the zero carbon homes standard. This means that these developments will only be required to meet the minimum energy efficiency standard, as set in Building Regulations which will be the equivalent of CSH4 and is equivalent to a 19% improvement on Part L Building Regulations. The previous iteration of the policy required all developments,</p>			

¹⁶ <https://www.gov.uk/government/speeches/planning-update-march-2015>

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>regardless of size to reach CSH5, which would have meant a 100% improvement in energy/carbon performance on Part L Building Regulations. This will have obvious implications on carbon emissions locally and the energy efficiency of new residential development, particularly when considering the amount of development that has come forward on smaller sites historically is high (55% between 2012-2014).</p> <p>The Allowable Solutions scheme allows developers to make a financial contribution to mitigate for carbon that will be emitted from development when full zero carbon standards cannot be met on site. Contributions would be pooled, and the scheme could therefore provide a mechanism for improving the energy efficiency of existing housing stock, which The Energy Study 2012 concluded would be required for the city to meet its CO2 reduction targets. It is likely, but not yet confirmed that the Allowable Solutions exemption could be for small sites, i.e. those delivering 10 or less units of housing. These sites would still need to meet minimum standards as set by Building Regulations. Locally, a higher than average proportion of housing is delivered through small site development (55% of housing delivered on small sites between 2002-2014 compared to 21% nationally). Information in the SHLAA suggests that only 5% of housing target between 2014-2030 will come from schemes delivering 10 or less units on sites identified. It is not possible to quantify what may come forward in the future from small windfall sites, however based on previous levels of delivery, this potentially could be a significant amount. This exemption therefore has the potential to have a significant impact on the amount of contributions pooled through Allowable Solutions, and is likely to impact on the city's ability to meet its carbon reduction targets. However, this is highly uncertain until the government confirms its position on how the scheme is implemented.</p> <p>Remaining policy requirements: There are many aspect of the policy that are unchanged which relate to this objective. The policy still requires development to deliver radical reductions in CO2 emissions, to address climate change mitigation, to be energy efficient, to</p>			

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>incorporate low or zero carbon technology, and to connect or contribute to low/zero carbon energy schemes. All of these policy requirements are considered to have positive impacts towards this objective, however it is difficult to know how these policy requirements will be implemented in combination with the national standards for energy efficiency which do not specifically require this.</p> <p>Overall, the impacts of the policy are still considered to be positive across all timescale, however are not considered to be as significantly positive as the previous iteration.</p>			
19) Taking account of the changing climate	<p>Direct impact. The policy is likely to have a positive impact on this objective, as the policy requires developments to demonstrate how they will address climate change adaptation, use sustainable materials, and reduce issues that may become more present with climate change, such as reducing the heat island effect and surface water run-off.</p>	+	+	+
20) Meet BREEAM / Code for Sustainable Homes	<p><i>It is noted that the reference to Code for Sustainable Homes has been removed from the policy. This is to reflect change in national policy requirements. This objective is now therefore only considered to be applicable to meeting BREEAM standards.</i></p> <p>Direct impact.</p> <p>Non-residential development is required to meet certain standards of BREEAM, including the “Outstanding” target post 2019. The policy, as amended should ensure that non-residential development continues to achieve high sustainable building standards, increasing in the medium to long-term.</p>	+	++	++
21) Increasing accessibility	<p>There is no link with this objective.</p>			
22) Reduction of waste	<p>Direct impact. The policy is likely to have a positive impact on the reduction of waste, as the policy requires developments to demonstrate how they will minimise waste and facilitate recycling, composting and re-use of materials. The supporting text also makes reference to aspiring towards waste neutral developments. In addition, waste is an issue addressed through BREEAM, which includes construction waste associated with development at construction stage. The removal of the requirement for residential development to meet certain levels of Code for Sustainable Homes</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>may have an impact on this objective as one of the categories under CSH covers the issue of waste, however the other policy requirements that are still in place should ensure positive impacts are achieved.</p>			

CP20 – Affordable Housing

Changes to text from previous assessment shown in bold font.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Housing development has potential to harm biodiversity existing on site, however also provides potential to enhance biodiversity through incorporation of biodiversity features. CP8 and CP10 should ensure effect is positive and enhances biodiversity.	-	-	-
2) Improve air quality	Housing development could have a negative impact on air quality, as an increase in housing could cause an increase in car ownership/usage in that location. Also see Objective 6. DA policies and SA6 should contribute towards ensuring that development is situated within areas of good transport links, ensure that development schemes respond to the demand for travel that they create and ensure that development occurs in areas where an individual's wider needs can be met, all of which should help to reduce the need to travel and have a positive impact on air quality.	-	-	-
3) Maintain local distinctiveness and sites	Housing development has the potential to have a negative impact on the surrounding areas if poor quality design is permitted. CP12 should ensure effect is positive and that development achieves high standards of urban design. In addition, housing development has the potential to have a negative impact on open space, if open space is developed or there is an increase in pressure on existing open space. CP16 should ensure open space is protected as well as that the open space requirements associated with housing development are delivered.	-	-	-
4) Protect South Downs	There is no link to this objective.			
5) Provide decent, affordable housing	Overall, the policy is likely to have a significant positive impact on this objective in the short and medium term , through the provision of decent, affordable housing, of which there is a great need locally . However, the SA considers this policy position to not be as strong as the former iterations due to the removal of the requirement for affordable housing contributions from schemes delivering between 6-9 units, reflected in the change to the long-term score. Analysis of the SHLAA indicates that whilst there will only be a 3% reduction in the total amount of affordable housing delivered (124 units out of 4,304 in the 2014-2030 period-see table below), that there is also likely to be a fairly significant amount lost that would otherwise have been secured on windfall sites of between 6-10 units, based on past completion rates which indicates a high proportion of housing comes forward on sites this size (19% in 2010-2014 period). In addition, the Assessment of Affordable Housing Need 2012 found the	++	++	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	affordable housing need to be 12,500 units in the 2012-2017 period, which includes a backlog of over 7,000 units from previous under-delivery. The affordable housing need will therefore increase every year, leading to a less significant positive impact in the long-term.			
6) Reduce amount of car journeys	Housing development is likely to have a negative impact on this objective, as an increase in housing is likely to cause an increase in car ownership/usage in that location, as described in the Transport Assessment 2009. It is recognised that the Development Areas are located in proximity of public transport, therefore reducing the potential for negative impact, however should new housing incorporate provision for parking, then car use is unlikely to be discouraged and therefore strong controls on parking should be promoted where possible, including car free housing for suitably located development. In addition to the Development Area policies, SA6 should ensure that development occurs in areas where an individual's wider needs can be met, thus reducing the need to travel. CP9 should contribute towards ensuring that development is situated within areas of good transport links and ensure that development schemes respond to the demand for travel that they create.	-	-	-
7) Minimise risk of pollution to water	Any development has the potential to increase the urbanised impermeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution. CP8 and CP11 should ensure that appropriate systems in place to reduce risk of surface water flooding.	-	-	-
8) Minimise use of water	Housing development will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. CP8 should ensure that water consumption is minimised.	-	-	-
9) Promote development of contaminated land	There is no direct link to this objective.			
10) Manage coastal defences	Coastal defences could be jeopardised through inappropriately located development. CP11 should ensure that development is only located in appropriate locations.	-	-	-
11) Employment: balance needs of tourists, residents and businesses	Delivery of housing has potential to create jobs, both during construction stage, and in operation stage, through the additional demand for services they create. However, it is recognised that land for housing could have a negative impact on provision of sites for employment, due to the availability of sites and land available, however this will be addressed through the forthcoming City Plan Part 2. The amendment to the policy could reduce costs due to the removal of requirements for affordable housing contributions on smaller sites. This could help bring smaller sites forward, although is not considered to impact significantly on the assessment findings.	+	+	+
12) Support economic	As objective 11 above.	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
development				
13) Improve health	<p>Access to decent, affordable housing is one of the wider determinants of health. Health and well-being therefore likely to be improved through implementation of the policy as it will result in delivery of affordable units as described under (5) above, albeit at an amount less than previous iterations of this policy. In the long term, the significance of the impact is likely to reduce, due to the high level of affordable housing need (12,500 units between 2012-2017), which includes the existing backlog from undersupply from previous years (over 7,000 units), and the likelihood that the affordable housing need will continue to increase in the long-term and the effects on health that this will have.</p> <p>Any proposals for strategic developments would incorporate a Health Impact Assessment, in accordance with CP18.</p>	++	++	+
14) Integrate health and community safety	Housing development can contribute towards improving community safety, through design features, as outlined in CP12.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Policy likely to have a direct positive impact on this objective. Barriers to Housing is one of the sub-domains by which multiple deprivation is measured, and includes measuring difficulty of access to owner-occupation due to income levels. This policy will ensure affordable housing is delivered, which should help to increase access to housing opportunities and reduce this form of deprivation, albeit at a level much less than that identified in the Assessment of Affordable Housing Need. Given the existing backlog in affordable housing, the positive impact may become less significant in the long term, as the need for affordable housing and the backlog continues to increase, which is likely to be greater under this iteration of the policy.</p> <p>In addition, employment opportunities arising through construction and through economic growth linked to delivery of housing also likely to contribute towards reducing deprivation.</p>	+	+	+
16) Engage local communities	Communities positively engaged in the planning process.	+	+	+
17) Make the best of previously developed land	Previous trends indicate that a high proportion of housing will be built on PDL.	+	+	+
18) Maximise sustainable energy	New development has potential to increase consumption of energy, therefore contributing towards climate change. However, also provides opportunity to build low/zero carbon homes. The government requires all new homes to be zero carbon by 2016, meaning that it is more likely to be significantly positive in the medium to long term.	-	+	+
19) Taking account of the changing climate	New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	conditions likely to occur with climate change. CP8 requires all development to be able to respond to changing needs.			
20) Meet BREEAM / Code for Sustainable Homes	<p><i>It is noted that the reference to Code for Sustainable Homes has been removed from the policy CP8. This is to reflect change in national policy requirements. This objective is now therefore only considered to be applicable to meeting BREEAM standards.</i></p> <p>There is no impact on this objective. BREEAM standard is only applicable to non-residential development.</p>			
21) Increasing accessibility	Inappropriately located development could severely impact residents' access to various services, including transport, food and health facilities. However the Development Area policies as well as SA6, CP12, CP13, CP18, and CP9 should ensure that access to services is met through development in appropriate locations. Affordable Housing and other development at DA7 would not increase accessibility to services, and investment in public transport would be necessary, as well as ensuring that there are local amenities to meet residents basic needs.	+	+	+
22) Reduction of waste	Housing development highly likely to create an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Tables to show SHLAA 2014 analysis and the amounts of affordable housing anticipated to be delivered under a) Submission CP20 requirements and b) Proposed Amendments CP20 requirements.

Also, evidence to show number of units that are likely to be exempt from the Allowable Solutions scheme under CP8.

A) Submission City Plan

Submission CP20	6-9 (2014-2030)	10-14 units (2014-2030)	15+ units (2014-2030)	Totals
Total amount (units)	574	290 (nb 30 of these are schemes delivering 10 units).	10,256	11,120*
Proportion Affordable at 20%	115	0	0	115
Proportion Affordable at 30%	0	87 (9 of which are from schemes delivering 10 units).	0	87
Proportion Affordable at 40%	0	0	4,102	4,102
Total affordable units expected	115	87	4,102	4,304

B) Proposed Amendments

Amended CP20	6-10 (2014-2030)	11-14 units (2014-2030)	15+ units (2014-2030)	Totals
Total amount (units)	604	260	10,256	11,120*
Proportion Affordable at 30%	0	78	0	78
Proportion Affordable at 40%	0	0	4,102	4,102
Total affordable units expected	0	78	4,102	4,180

* Includes: Identified Sites in DAs; Identified sites outside DAs; Small Identified Sites (<6 units). Does not include broad locations, or unidentified site allowance.

Appendix C – Selection / Rejection of Alternatives

This section only includes the policies that have been re-assessed at this stage as the amendments to other policies were found to have no impacts or not change the previous SA findings.

Stages:

I&O 2005 – Issues & Options

PO 2006 – Preferred Options

RPO 2008 – Revised Preferred Options

PAP 2009 – Policy Amendments Paper

SUB 2010 – Submission Core Strategy

POP 2011 – Policy Options Papers Stage – City Plan

DCP 2012 – Draft City Plan

SUB 2013 – Submission City Plan

PM 2014 – Proposed Modifications

FM 2015 – Further Matters – additional proposed modifications

Spatial Strategy		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Option A – An accessibility-led approach. Optimising development within the built up area by identifying areas based on their accessibility to sustainable travel.	I&O 2005	Selected. The SA found this option to have the greatest potential for reducing car use and improving air quality, and making employment opportunities more accessible, but that it could have other adverse impacts if applied in isolation, including loss of local distinctiveness, not making the best use of previously developed land and not taking into account whether development can be accommodated. Deprivation in less accessible locations may also increase.
Option B – A regeneration-led approach. Optimising development opportunities within the built up area by identifying areas of growth	I&O 2005	Rejected. This approach had some positive impacts including improving the health and employment opportunities for deprived communities. However, this approach could have adverse impacts on air quality and congestion, particularly in less accessible locations if sustainable transport was not improved, and that other areas of the city could suffer from economic deprivation. The SA concluded that the identified

opportunity based on regeneration needs, including directing development to EB4U and Neighbourhood Renewal Areas.		regeneration areas should be included within any preferred option, but that significant higher density development should not be permitted until social and employment issues had been addressed.
Option C – An urban character / urban capacity-led approach. Based on the findings of studies which indicate the type and density of housing that could be accommodated within the urban areas of the city.	I&O 2005	Selected. This option was found to have positive impacts for biodiversity, preserving local distinctiveness, achieve better accessibility, enable economic development, improve community safety and make the best use of PDL. Some adverse impacts were identified including increasing pressure on existing infrastructure, and may not address specific health issues. The SA suggested that this approach should form part of the preferred option.
Option D – Limited development and expansion on the urban fringe. Still optimising development within the built up area but in addition to allow limited development on the urban fringe in the long term.	I&O 2005	Rejected. There were some positive impacts resulting from this option including the potential gains for enhancing visitor experiences to the SDNP, and the reduction in pressure within the built up area, particularly benefiting the historic built environment. More adverse impacts were identified including the likelihood for biodiversity losses and losses of leisure and open space. This option was also found to potentially increase in traffic congestion due to lack of accessible and sustainable transport and may not protect environmental resources. The SA concluded that it may be necessary to allow limited development on the urban fringe to relieve the carrying capacity of the city.
Option E – Identification of large strategic development sites. In addition to optimising development within the built up area, to allow for significant extensions to the Marina, the Harbour, or even a man-made island off-shore.	I&O 2005	Not assessed. This approach was not assessed by the SA as there were serious doubts over the deliverability of such an approach, and that this approach had limited potential.
Business as usual – continue with Local Plan.	I&O 2005	Rejected. Although there were many positives with continuing with the Local Plan approach, this approach was not found able to achieve the aims of spatial planning; it would not assist in the regeneration of deprived areas, it would not deliver the infrastructure required to accompany growth and may not supply the housing needed to meet needs and is reliant on windfall. The SA concluded that this approach was not

		a sustainable one in the long term.
Preferred Approach combining Option A and Option C: accessibility/urban character/urban capacity approach and identifying 10 broad areas within the built-up area where significant mixed-use, high density development should be directed to.	PO 2006	The SA noted that the Spatial Strategy had taken on board recommendations to combine certain approaches and to consider strengthening regeneration areas by allowing some development to create more sustainable communities. The 10 broad areas were identified using these combined approaches and should therefore lead to overall positive impacts for maintaining local distinctiveness, supporting employment and economic development, improving health and reducing deprivation, whilst protecting the surrounding countryside.
Preferred Approach, based on PO 2008 Spatial Strategy, identifying 7 broad areas where significant mixed-use high density development should be directed within the built-up area. Some areas were removed from the Spatial Strategy due to limited potential for accommodate change; other areas were combined together to make a larger development; 2 new areas added.	RPO 2008	The SA re-considered Option E (Approaches to Growth) at this stage, due to emerging work put forward by SEEDA regarding the potential for Shoreham Harbour to accommodate significant development, and therefore resulted in Shoreham Harbour being included within the Spatial Strategy. The SA also re-considered Option D (Approaches to Growth), however the uncertainty over the extent of the urban fringe due to the SDNP inquiry at the time, along with the findings of the SHLAA and regeneration potential at Shoreham Harbour clarified the decision to continue to exclude the urban fringe from the spatial strategy. The impacts of the Spatial Strategy overall were considered to be similar to those outlined in PO 2006 above, with more specific area-impacts identified in each of the Development Area assessments.
Preferred Approach, mainly based on the RPO 2008 approach, by identifying 7 broad areas where significant mixed-use high density development should be directed. In addition, the Spatial Strategy allows for residential development within the urban fringe to be considered on a contingency basis.	PAP 2009	This change to the Spatial Strategy now includes Option D (from Options for Growth stage) of allowing limited development on the urban fringe in the long term in combination with the other Approaches to Growth that helped to identify the 7 Development Areas (Urban Capacity/Accessibility). The impacts of the change in the Spatial Strategy were considered under the assessment of SA4 (Urban Fringe policy) and were considered to be generally mixed and uncertain in the long term due to the contingency position,, particularly on the environmental objectives, but more positive towards housing. Overall, the Spatial Strategy should still result in impacts as described above, in terms of maintaining local distinctiveness, promoting employment and economic development, improving health and reducing deprivation.

Preferred Policy Approach, as set out under PAP 2009.	SUB 2010	Impacts as PAP 2009 above.
Preferred Approach. Spatial Strategy now consists of 8 Development Areas. 7 are carried forward from SUB 2010 stage and are located within the original built up area (based on the Urban Capacity/Accessibility Approaches). 1 new Development Area added consisting of a former urban fringe site which has been brought into the built up area. The contingency position for development within the urban fringe to take place in the long term has been removed. Spatial Strategy now also includes policy SS1 Presumption in Favour of Sustainable Development.	DCP 2012 / SUB 2013	<p>Overall, impacts from the Spatial Strategy should be positive for maintaining local distinctiveness, housing, employment and economic development, health, safety, deprivation and accessibility. Despite being based on the accessibility approach, in combination the Development Areas may have an adverse impact on air quality and transport, and will much depend on travel choices of the increased population. The removal of the contingency position removes some uncertainty associated with the position, and although the Spatial Strategy now includes a Development Area that was formerly located within the urban fringe, some of the impacts of development in this location are more certain due to it being an identified site. Other site specific adverse environmental impacts considered likely.</p> <p>Individual impacts from delivery of Development Area policies are considered in more detail in individual assessments.</p>
Option 1 – based on SUB 2013 approach.	PM 2014	See impacts as described under SUB 2013 above. Option rejected due to the need to meet a greater housing need.

<p>Option 2 (Preferred Approach) – based on SUB 2013 based on former Spatial Strategy approach of combining the accessibility and urban capacity approaches, maximising opportunities for brownfield development, but now includes the urban fringe as a broad source of potential for housing.</p>	<p>PM 2014 & FM 2015</p>	<p>The Spatial Strategy has positive impacts for employment and economic development through the creation of temporary jobs associated with house-building as well service-sector and other jobs to meet the needs of the increased population. Housing will be created to contribute towards the objectively assessed need, also being one of the wider determinants of health. The housing target is lower than the OAN and therefore some local social impacts may not be addressed, although will go further than former versions of the spatial strategy. There will be various environmental impacts, resulting from loss of open space in the urban fringe as well as development on PDL. Loss of some of the urban fringe open space sites will be a net loss against the city’s assessed quantity standards, thus increasing the pressure on remaining areas of open and will impact adversely against the standards for accessibility. Loss of open space on the urban fringe could also have adverse health impacts. Development throughout the city will increase the consumption of natural resources. and increase the likelihood of adverse transport-related impacts.</p>
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CP1 Housing Delivery		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
<p>AH1) Plan to provide new housing in accordance with the South East Plan target.</p>	<p>PO 2006</p>	<p>Selected. Although this option raised some uncertainty, as the housing target was unknown, and could therefore have adverse implications against some of the environmental objectives, that there would be significant positives for the social objectives.</p>
<p>CP11 Option 1) Outline the strategy for the planned location of new housing (in accordance with the South East Plan target of 570 homes annually), the mix of housing and to ensure proposals for residential development demonstrate how the additional demand for associated infrastructure and local services will be met.</p>	<p>RPO 2008</p>	<p>Selected. The development of new housing across the city raised several uncertainties and negativities towards some of the sustainability objectives, however to plan for housing needed was positive.</p> <p>No alternative option was put forward, as a “do nothing” option would not be acceptable as government guidance at that time set out specific requirements for the delivery of new housing within local planning authority areas.</p>

Preferred Policy Approach, building on RPO 2008 Option 1, but allowing residential development on the urban fringe in the long term as a contingency basis.	PAP 2009	The policy has strong positive impacts for housing and health and positive impacts on some other objectives. The policy has mixed impacts on a range of environmental objectives. These mixed impacts are anticipated to become more adverse in the long term when development on the urban fringe takes place, e.g. on biodiversity, traffic, water pollution, adapting to climate change and accessibility.
Preferred Policy Approach, building on PAP 2009 and incorporating a site selection process for sites on the urban fringe.	SUB 2010	The policy has strong positive impacts for the social objectives, particularly health and housing, and positive impacts for employment and economic development. Adverse impacts are anticipated against a range of environmental objectives, which become more significant in the long term due to the release of sites on the urban fringe.
1) 9,800 new homes all within the built up area of the city.	POP 2011	Rejected. Option has positive impacts for housing but performed the least well against this objective compared to other options and was therefore not considered to be the best option.
2) 11,200 new homes mainly within the built up area of the city, and development on a greenfield site (Toads Hole Valley).	POP 2011	Selected. Option performs positively against the housing, employment and economic development objectives. Also performs positively against the health objectives. Some adverse impacts anticipated, mainly due to the release of a named Greenfield site, however SA considers that some may be overcome with appropriate mitigation.
3) 13,500 new homes with development on Greenfield site (as option 2), plus total loss of 11.5ha of employment sites and 23ha of open space to housing.	POP 2011	Rejected. Performed positively against the housing objective, more so than options 1 and 2, however performed negatively against the employment and economic development options, as well as transport, air quality and local distinctiveness due to loss of employment and open space sites, also impacting on health.
4) 15,800 new homes with development on a Greenfield site (as options 2 and 3), plus total loss of 23ha of employment sites and 46ha of open space to housing. Options 2, 3 and 4 all also included mixed use development on some employment sites and some	POP 2011	Rejected. Performed the most strongly against the housing objective, however performed the most negatively against a range of other objectives due to loss of employment sites and sites of open space. The significance of the adverse impacts considered to outweigh the benefits of delivering higher amounts of housing.

development at Shoreham Harbour.		
Preferred Policy Approach, building on POP 2011 Option 2 above, by directing the majority of residential development to the built up area of the city, and allowing development on a named greenfield site, by bringing that into the built up area boundary. Housing target of 11,300 homes.	DCP 2012 / SUB 2013	This policy performed positively against housing, as although less than the Objectively Assessed Need the target would still make a significant contribution towards the local housing requirement. Strong positive impacts are also anticipated against the health objective. Other positive impacts of note include impacts on employment and economic development and deprivation. A range of adverse impacts are anticipated, mainly on environmental objectives which would require mitigation at development stage. Stronger adverse impacts anticipated on traffic and air quality due to anticipated increase in car ownership and travel.
Option 1 - 13,200 units delivered including 1,000 on the urban fringe.	PM 2014 (July)	Selected. This option does not meet the OAN and therefore has mixed social impacts, including on the housing objective. This option has strong positive impacts for employment and economic development. Employment opportunities may result in positive impacts for reducing deprivation and impacts positively on health, with employment being one of the wider determinants of health. Loss of open space in the urban fringe is associated with various environmental impacts including possible impacts on biodiversity, landscape setting, water pollution, and climate change adaptation and would require mitigation. Loss of open space on the urban fringe could also have adverse health impacts, particularly relating to increasing health inequalities for deprived communities. Mitigation would be required.
Option 2 - meeting the OAN of 24,000 homes including, delivering 1,000 on the urban fringe; loss of 54ha of employment sites in the city and 108ha of open space from within the built up area.	PM 2014 (July)	Rejected. Option has strong positive impacts for housing. However this option would result in total loss of 39% of certain employment sites within the city and 32% of certain types of open space within the city, leading to significant irreversible adverse impacts including on the local economy and employment, but also the open space resource, biodiversity, increased transport, reduction in air quality, and most significantly on health and inequalities and would be permanent and irreversible.
Preferred Policy Approach based on SUB 2013 incorporating Option 1 (PM2 2014 Jul) stage which includes	PM 2014 (Jul)	Preferred Policy Approach. Policy impacts as described under Option 1 PM 2014. The policy will result in positive impacts for the economic objectives, adverse impacts for the environmental objectives and mixed impacts for the social objectives, including housing delivery, health and deprivation, but will go some way to addressing some of

the urban fringe as a broad source of potential for housing with the potential for delivery of around 1,060 units of housing. 13,200 units of housing delivered in total, which also includes a greater allowance for windfall over the entire plan period.		the housing related social issues. A range of adverse environmental impacts are anticipated which would require mitigation.
Preferred Policy Approach, based on SUB 2013 incorporating Option 1 (PM 2014 stage) which includes the urban fringe as a broad source of potential for housing with the potential for delivery of around 1,060 units of housing. 13,200 units of housing delivered in total. Reference to the site allocations process and the status of the Urban Fringe Assessment in the determination of planning applications included.	PM 2014 (Sep) FM 2015	Preferred Policy Approach. The policy will result in positive impacts for the economic objectives, adverse impacts for the environmental objectives and mixed impacts for the social objectives, including housing delivery, health and deprivation, due to the anticipated shortfall between the housing target and updated OAN but will go some way to addressing some of the housing related social issues. A range of adverse environmental impacts are anticipated which would require mitigation.

CP8 Sustainable Buildings		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PRE1) To require developments to achieve highest standards of sustainable building design.	PO 2006	Selected. This option was found to have positive impacts against the environmental objectives although it was recognised that there may be additional costs of meeting high standards.
CP1 Option 1) To require all new	RPO 2008	Selected. This option was found to have positive impacts against all of the

development to deliver levels of building standards in advance of those set out nationally in order to avoid expansion of the city's ecological footprint and to mitigate against climate change.		environmental objectives. It was found to have mixed impacts against the housing objective as could impact on the viability of building affordable homes.
CP1 Option 2) Business as usual.	RPO 2008	Rejected. This option could result in standards being applied that do not reflect the distinctive local circumstances. This was found to result in mixed impacts against some of the social and environmental objectives.
CP1 Preferred Policy Approach, building on RPO Option 1 above, and incorporating stronger wording that requires development to achieve certain standards.	SUB 2010	The policy has strong positive impacts on the objectives relating to biodiversity, water reduction, health, energy consumption and meeting high building standards. Other positive impacts also anticipated. Adverse impacts identified against the housing objective due to the conflict between building highly sustainable and affordable homes.
CP8 Preferred Policy Approach building on SUB 2010 above.	DCP 2012	Impacts as described under SUB 2010 above.
CP8 Preferred Policy approach, building on DCP 2012 however deferring the requirements of meeting higher standards to later on in the plan period.	SUB 2013	Impacts as described under SUB 2010/DCP 2012 above for the medium and long term, although less significantly positive against some objectives in the shorter term due to relaxation in standards required to be achieved. Adverse impacts still anticipated against the housing objective, however the policy allows viability of a scheme to be a consideration.
CP8 Preferred Policy Approach, building on SUB 2013, however reducing the environmental building standards required for residential development across all timescale and removing any difference for residential development on Greenfield sites to achieve higher standards than those on PDL. Further requirements added relating to development being required to	PM 2014	Impacts mainly as described under SUB 2013. Impacts considered to be significantly positive across relevant objectives, including those relating to water and energy minimisation, and meeting building standards despite the change in policy. Relaxation of building standards required to be achieved impacts positively on viability and the housing objective, which is a change from the previous position. Additional requirements relating to land pollution and protection of groundwater impact positively on relevant objectives.

<p>reduce land pollution, and added protection for groundwater protection zones.</p>		
<p>Amended Policy Approach, removing references to Code for Sustainable Homes, replacing them with a standard for energy performance and water efficiency for residential development. Reference to the future exemption from Allowable Solutions added. Changes to bring policy in accordance with national policy.</p>	<p>FM 2015</p>	<p>Amended policy not as strong as previous version on some SA objectives, namely biodiversity (1), water minimisation (8) and energy consumption (18) in the long term due to removal of Code for Sustainable Homes standards and reference to the introduction of exemption from Allowable Solutions from small sites. The exemption from Allowable Solutions also impacts on the objective for reducing deprivation, making this more uncertain, due to the impact this could have on enabling the energy efficiency improvements on existing housing stock and subsequent reductions in fuel poverty. Conversely, the exemption from Allowable Solutions was found to have a minor positive impact on both the housing and economic development objective, which is an improvement from the previous iteration, although was considered to be fairly uncertain and will depend on implementation.</p> <p>All other impacts remain the same as the previous iteration including positive impacts on air pollution, reducing car journeys, minimising water pollution, promoting development of contaminated land, improving health, promoting development of previously developed land, meeting BREEAM, and reducing waste, however it is noted that implementing the policy may be compromised without the requirement to meet Code for Sustainable Homes and the quality assurance system this involved.</p>

CP20 Affordable Housing		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
AH4) To increase the proportion of affordable housing required from new development.	PO 2006	Selected. Although this option will bring beneficial impacts relating to increasing affordable housing provision, it is noted that the amount delivered was unlikely to meet demand, resulting in an increasing shortfall of affordable housing.
CP 12 Option 1) To set out a plan wide target to secure an annual average of 230 units of affordable housing over the plan period from all mechanisms. Informed by an updated Viability Study, the council will negotiate with developers to secure up to a 40% element of affordable housing on all larger (10+) development sites with criteria set out to assess the proportion and type of affordable housing proposed informed by up to date assessments of local housing needs and site/neighbourhood characteristics.	RPO 2008	<p>Selected. The SA concluded that option 1 would be the most sustainable as this would reflect the nature of housing sites available for housing in the city. This option has positive impacts against the objectives for housing, economic development, the health and deprivation objectives.</p> <p>Uncertainty was expressed as to whether the cost of providing affordable housing may conflict with the cost of providing sustainable homes.</p>
CP 12 Option 2) To have a higher percentage target of affordable housing provision than the current Local Plan 40% for sites capable of delivering 10 units or more.	RPO 2008	Rejected. The SA concluded that option 2 would not be a viable option as the 2007 Affordable Housing Viability Study found that this would stretch viability too far and may therefore jeopardise development. Although the impacts on the health objectives were positive, the other impacts were all uncertain.

CP12 Option 3) To include a requirement for affordable housing for sites less than 10 units in size.	RPO 2008	Rejected. Whilst the option of a 'sliding scale' of contributions to affordable housing was recommended by the 2007 Viability Study, the Strategic Housing Market Assessment (2008) suggested that the cost and resource implications of negotiations would need to be weighed against the financial contributions to affordable housing of this approach. This option generated much uncertainty, and was similar to Option 2 in impacts.
CP12 Option 4) Business as usual.	RPO 2008	Rejected. Although this option generated similar impacts to option 1, adopted policy does not reflect findings of updated studies and the impacts on employment and economic development were considered to be uncertain.
Preferred Policy Approach, building on RPO 2008 Option 1 above, and clarifying that the council will seek up to 40% affordable housing in each development scheme delivering 10 or more units.	SUB 2010	Policy has strong positive impacts on the objectives relating to housing and health, and positive impacts on employment, economic development, safety and deprivation and some other objectives. Some adverse impacts anticipated associated with the delivery of new development.
Preferred Policy Approach, combining the approaches of RPO 2008 Option 1, requiring a target of 40% affordable on schemes delivering 15+ units, as well as one of the rejected options, option 3 from RPO 2008, which requires a sliding scale of affordable housing contributions from smaller schemes, (30% for 10-14 units and 20% for 5-9 units) to reflect the findings of updated evidence and studies.	DCP 2012 / SUB 2013	Impacts similar to those as described under SUB 2010 above, with strong positive impacts still anticipated for the housing and health objectives, and adverse impacts associated with the delivery of new development. The SA found that the inclusion of contributions from smaller schemes would make a valuable contribution in the city, given that many schemes are "smaller" within the definition of the policy.
Amended policy approach, removing the requirement for 20% affordable housing contributions from schemes	FM 2015	The policy will still seek to secure affordable housing, albeit on a smaller range of schemes than previous iterations. The policy was found to have strong positive impacts for housing and health in the short and medium term. However, the removal of the requirement for contributions from smaller schemes was found to have greater

<p>delivering between 5-9 units to be in accordance with national policy. The requirement for 30% from sites between 10-14 units is amended to only apply to sites delivering between 11-14 units. The 40% requirement from sites delivering over 15 units remains the same.</p>		<p>significance in the long term, as the need for affordable housing becomes greater over time (due to the amount required compared to the overall housing target and potential affordable likely to be delivered), resulting in a less significant positive impact in the long term. The policy is still anticipated to have positive impacts on employment, economic development, safety and deprivation and some other objectives. Some adverse environmental impacts are considered likely due to the delivery of development, which would require mitigation, considered to be met through implementation of other Plan policies.</p>
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Appendix D – Cumulative Impacts Tables

The following tables show the likely long term impacts of the area based policies and the citywide policies on each of the sustainability appraisal objectives in the long term. Impacts for polices that have changed since the **Proposed Modifications** version are shown in **bold font**. This applies to CP1, CP8 and CP20 only.

Table D1 Area based policies

		Sustainability Objectives																					
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/GSH	21 Accessibility	22 Waste
Area Based Policies	DA1	+	-	+			-	+	-	+		++	++	-/+	+	+	+	+	+	-	+	-	
	DA2	-/+	--	-/?	?	++	--	-	-	+	--	++	++	-/+	+	+	+	+	+	--	-	++	-
	DA3	+	-	-/+	+	++	--	-/+	-	+		++	++	-/+	+	+	+	-/++	+	-/+	-/+	++	-
	DA4	+	--	-/+		++	--	-	-	+		++	++	-/+	+	+	+	+	++	-	-	++	-
	DA5	+	-	-/+		++	-	-	-	+		++	++	-/+	+	+	+	++	++	-/+	-	++	-
	DA6	+	-	+		++	-	+	-	+		++?	++?	-/+	+	+	+	++	+	-/+	-	++	-
	DA7	-?	-	+	+	++	--	+	+	?		+	+	+	+	+	+	-	+	-	+	+	-
	DA8	-?	-	+	?	++	-	-/+	-	+	--	++	++	-/+	+	+	+	++	++	--	-	+	-
	SA1	-/+	-/+	++	+	++	-/+	+	-	?	+	+	+	++	+	+		+	+	+	-	+	-
	SA2	+	-/+	++		+	-	-	-			++	++	-/+	+				++	-	-	+	-
	SA3	++	++	++			++	+	-			+	+	++	++	+	++	+	+	+	-	++	-
	SA4	-/+?	+	--/+?	-/+?	+	-/+?	-/+?	-	+		+	+	-/+?		-/+?	+		-	-/+		-/+?	
	SA5	+	+	++	++		+	+				+	+	+			+					+	-
	SA6	+	+	+		+	+	-	+	?		+	+	++	+	++	++	+	+	+	+	++	-

Table D2 Citywide policies

		Sustainability Objectives																					
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/GSH	21 Accessibility	22 Waste
Citywide Policy	CP1	-?	-	--?	-?	+/	-	-	-	?	-	+	+	-/+	+	-/+?	+	+	+	:	-	-/+	-
	CP2		-				-					++	++	+		+			+	+		+	
	CP3	- /+?	-	-/+	-?	+	-/+	-	-/+	+?	-	++?	++?	+	+	+		+	+	-	-	+	+
	CP4	-	-	+		-	-	-	-			++	++	+		+			+	-	-	++	-
	CP5		-/+	+	+		-/+		+			++	++						+	+	+	+	-
	CP6	-	+	+	+	+?	+	-	-			++	++					+	+	-	-		-
	CP7	+	+	+	+	+	+	+	+		+	+	+	++	+	++			+	+		+	+
	CP8	+	+			+?	+	++	+	+			+?	++		+?		+	+	+	++		+
	CP9	?	+	?	?		+	?				+	+	+	+	+	+			?		++	
	CP10	++	+	+	++			++			+			+				+		++			
	CP11	-/+		+				++			++	+	+	+	+					++		+	
	CP12	+	+	++	++		+					+	+	+	++	+		++		+	+	++	
	CP13	++	++	++			++					+	+	++	+	+	+	+		+		++	+
	CP14	+	-	-/+	+	++	-	-	-		+	+	+	++	+	+		++	+	-	-	+	-
	CP15			++	+				+			++	++				+			+			
	CP16	- /++	+	-/+	-?	+	+	- /++			+	+		++	+	-/+				- /++		- /++	
	CP17		+	+		+	+	-				+		++	+	++	+	+				+	-
	CP18	+	+	+			+							++	+	++	+					++	
	CP19					++						+	+	++		+		+					
	CP20	-	-	-		+	-	-	-		-	+	+	+	+	+	+	+	+	-	-	+	-
	CP21	+	-/+	++	-/+?	++	-/+	+	-	+?	+	+	+	+	+	+?	+	+	+	-	+?	+	-
	CP22	+		+	+	+		+						++	+		+			+		++	



**Brighton & Hove
City Council**

Brighton & Hove Submission City Plan Part One

Proposed Modifications

October 2014

Sustainability Appraisal Addendum



Brighton & Hove
City Council

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1. Introduction

1.1 Background

- 1.11 Brighton & Hove City Council began the preparation of the City Plan Part 1 Development Plan Document (DPD) in October 2011 which followed on from work to progress its Core Strategy that commenced in 2005. As part of this process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken (hereinafter referred to as SA).
- 1.12 A SA Report has been produced at various stages throughout the development of the Core Strategy/City Plan, including the SA of the Submission City Plan in February 2013, documenting the SA process and the assessment results up to that point.
- 1.13 Brighton & Hove City Council submitted the City Plan Part 1 in June 2013. The Examination in Public on the Submission City Plan Part 1 was held between the 22nd and 31st October 2013.
- 1.14 A number of proposed modifications to the Submission City Plan have been put forward and any significant changes that are made to the Submission City Plan must be subject to Sustainability Appraisal to ensure that the likely sustainability effects of implementing the Plan are assessed, documented and understood.

1.2 Purpose of this report

- 1.21 The purpose of this Addendum Report is therefore to assess the sustainability implications associated with the proposed modifications to the Submission City Plan that have arisen from:
- the representations received during consultation on the soundness of the Plan in April 2013,
 - the Statements of Common Ground that were agreed between the council and stakeholders prior to the Examination in Public,
 - discussions that took place with stakeholders during the Examination in Public process, and
 - correspondence with the Inspector during and following the Examination in Public.

1.3 Next Steps

- 1.31 The proposed modifications will be subject to consultation, along with this SA Addendum Report.
- 1.32 Unless otherwise stated, this report does not repeat information produced in the Submission SA Report, February 2013 unless it has been updated, and should therefore be read alongside it. Appendix I sets out the how the requirements of the SEA Directive have been met and shows which document and section contains the specific requirements.

2. Submission Representations

- 2.1 Representations on the Submission City Plan and its accompanying SA Report were received during the consultation period April 2013. Amongst the representations received, some were directly related to the SA. Details of the representations received on the SA at this stage and the response to the comments are provided in Appendix A.

3. Changes affecting the Sustainability Appraisal Report

- 3.1 In order to ensure any new appraisal is placed in the current context, a review of the Plans, Policies and Guidance section, the baseline situation and the Sustainability Issues section of the Submission City Plan Sustainability Appraisal 2013 has taken place.
- 3.2 This review shows that there have been some key changes which are considered to be of significance and that should be outlined in this Addendum report.

3.3 Housing

- 3.31 In May 2014, the Assessment of Housing Development Needs, Sussex Coast Housing Market Area was published. This provides an assessment of objectively assessed need for housing for all of the local authorities in the Sussex Coast area. This assessment concludes that the objectively assessed housing needs for Brighton & Hove for the period 2011-2013 fall within a range of 18,000 to 24,000 dwellings. This is equivalent to 900 to 1,200 dwellings per annum. This study supersedes the May 2013 Housing Study (Duty to Cooperate), Sussex Coast Housing Market Areas study which concluded the objectively assessed housing needs for Brighton & Hove to fall within the range of 800 to 1000 dwellings per annum, or an equivalent amount of 16,000-20,000 dwellings over the plan period.
- 3.32 In 2014, an independent assessment of the urban fringe was carried out. This assessment looked at the potential for residential development on 66 sites located within the urban fringe and assessed whether site constraints could be overcome or mitigated to make development on these sites acceptable. The Urban Fringe Assessment concluded that 39 sites or parts of sites had potential for residential development where impacts could be minimised and appropriately mitigated. The 39 sites or parts of sites make up a total of 31ha, covering 7.5% of the total urban fringe.
- 3.33 In June 2014, a draft update of the Strategic Housing Land Availability Assessment (SHLAA) was published which shows an identified housing supply over the plan period of 13,210. This includes 1,060 from the urban fringe which has been identified as a broad source of potential following on from the Urban Fringe Assessment. In addition, the likely contribution of windfall sites across the entire plan period has been estimated to be 1,250 units.

3.4 Air Quality

- 3.41 In August 2013, the former 2008 Air Quality Management Area was revoked and replaced with the 2013 AQMA. This follows on from a Detailed Assessment in 2012 that assessed two areas that were outside the 2008 AQMA, and an Updated Screening

Assessment that provides a comprehensive review of air quality throughout the city. The AQMA 2013 now includes two areas that were not in the previous AQMA, Preston Road and Rottingdean High Street. However, overall the AQMA 2013 is now a quarter of the size of the previous AQMA and many streets that were previously within the AQMA are now outside the new designation.

- 3.42 Overall, continuous analysis of outdoor air indicates a long term improvement in Nitrogen Dioxide outside the AQMA boundary. Improvements are recorded in lower density areas, in outer roadside locations and in suburban neighbourhoods where prevailing air quality is good. In combination with source reductions in lead, benzene and carbon monoxide it is likely that where many people live the air inhaled is more healthy than ten or twenty years ago.
- 3.44 However, monitoring at city centre roadside sites strongly suggests that Nitrogen Dioxide Concentrations have not improved in the past ten years. At a number of roadside locations NO₂ concentrations are essentially the same as those recorded in 2002/03. Provisional indications suggest this remains the case during 2013. Concentrations remain above the NO₂ legal limit within nine metres (thirty feet) of narrow roads in parts of Brighton, Portslade and Rottingdean.
- 3.45 A revised Air Quality Action Plan is now anticipated to be produced in 2014.
- 3.46 A map showing the AQMA 2013 boundary can be found in Appendix B.

3.5 Marine Conservation Zones

- 3.51 In November 2013, the Department for Environment, Food and Rural Affairs (Defra) announced the designation of 27 Marine Conservation Zones around the UK. This includes the Beachy Head West Marine Conservation Zone which is a thin strip from Brighton Marina to Beachy Head, East Sussex.
- 3.52 Marine Conservation Zones (MCZ) have been designated to conserve the diversity of nationally rare, threatened and representative habitats and species. Within each MCZ, the objective is to ensure the features being protected are in a favourable condition.
- 3.53 The Beachy Head West MCZ is split into two sections of which some of the Brighton Marina to Newhaven strip falls within the administrative boundary of Brighton & Hove. This section has been designated for the following features, not all of which are found within Brighton & Hove:

Broadscale Marine Habitat

- Intertidal Course Sediments
- Sub-tidal Mixed Sediments
- Sub-tidal Mud
- Sub-tidal Sand

Marine Habitat

- Blue mussel beds
- Infralittoral muddy sand

- Infralittoral sandy mud
- Low energy infralittoral rock and thin sandy sediment
- Littoral chalk communities
- Sub-tidal chalk

Species of Marine Fauna

- Native oyster
- Short-snouted seahorse

3.54 Under the Marine and Coastal Access Act 2009 local authorities are obliged to carry out their functions in a way that best furthers the conservation objectives of a MCZ. Where this is not possible, a local authority must proceed in a manner that least hinders the achievement of the MCZ's conservation objectives. Statutory Nature Conservation Bodies (Natural England for inshore waters, up to 12 nautical miles, and Joint Nature Conservation Committee for offshore water, 12-200 nautical miles) will publish advice on how the conservation objectives can be achieved.

3.55 A map showing the MCZ boundary can be found in Appendix B.

3.6 Habitats Regulations Assessment

3.61 The inclusion of the urban fringe as a broad source of potential for housing, in addition to the increased housing target, has led to the review of the Habitats Regulations Assessment to ascertain whether the proposed modifications would have any impact on the integrity of European Sites.

3.62 The screening stage has been undertaken and concludes that possible impacts on European sites amount to water abstraction, air pollution and recreational pressures, although none would be significant as described below.

- Water abstraction would not have a significant effect on any site because there are no such sites which are vulnerable to water abstraction within the water catchment area of Brighton & Hove.
- Despite policies which promote travel choice and minimise air pollution, it is still possible that air pollution may worsen as a result of the City Plan Part 1. However localised air pollution of this nature would not have any significant effect on any European site.
- Recreational pressure on downland in the vicinity of Brighton & Hove may increase as a consequence of the City Plan Part 1. However, only one of the European sites assessed is vulnerable to recreation pressure (Ashdown Forest) and studies elsewhere have shown that this site is far enough away from Brighton & Hove to safely conclude that there would be no significant recreational impact on it as a result of the City Plan Part 1.

3.63 Overall, the possible effects have been discounted at screening stage and no recommendations for changes to the City Plan in relation to the Habitats Regulations Assessment have taken place.

3.7 Strategic Transport Assessment Update

3.71 The Strategic Transport Assessment has been updated to reflect the increased housing target resulting from the additional potential identified within the urban fringe and the increased windfall allowance. The Transport Assessment found:

- The proposals (with mitigation) show an increase in both car trips and public transport trips. This is to be expected given 20 years of growth on the network from committed developments and background traffic growth.
- The overall public transport modal split for the city is lower with the urban fringe sites because these have lower levels of public transport accessibility than the development areas.
- Without further public transport interventions, the modal split from the new urban fringe sites is likely to be more car dominated than for the development areas.
- There is a higher modal share by public transport with and without the additional 1,900 dwellings than in the 2010 base case scenario.
- Throughout the city, in the evening peak, the mitigation identified in the Transport Assessment 2013 will be sufficient to return the operation of the network to slightly better than the 2010 base.
- In the morning peak, with mitigation, there is a deterioration of around 8% (in journey time) than the 2010 base.

3.8 Publication of National Planning Policy Guidance

3.81 In March 2014, the online Planning Practice Guidance was published. This guidance replaces former planning guidance documents, which therefore need to be removed from the PPG section. The PPG section contained the following guidance documents and references which are no longer of relevance:

- Plan Making Manual
- Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks
- Planning and Access for Disabled People: A Good Practice Guide

3.9 Sustainable Community Strategy

3.91 The refreshed Sustainable Community Strategy - The Connected City was published in 2014. This sets out five main priorities for the city for the next 3 years as the economy, children and young people, health and wellbeing, community safety & resilience, and environmental sustainability. The City Plan must be in conformity with the Sustainable Community Strategy.

3.10 Baseline Data

3.101 The very nature of baseline data means that it is constantly evolving. Some data, such as additional data from the Census 2011, which is useful for context, has been released since the Submission City Plan Sustainability Appraisal (2013) was published. Although this information is useful, it is not considered necessary to update the entire baseline data table at this stage. Monitoring the Sustainability Appraisal Indicators in the

Authorities Monitoring Report will present the opportunity to update and publish some of this updated information and to allow trends to be monitored as well as the impacts of implementation of the City Plan.

3.11 Sustainability Issues

3.111 The key sustainability issues for the city continue to be:

- The Ecological Footprint is higher than the regional and national average
- The need to continue to reduce carbon emissions from all sources
- Flood risk; including tidal, surface water and groundwater
- Air quality; NO₂ levels continuing to exceed the Air Quality Objective particularly in central locations
- Congestion, noise and poor air quality resulting from transport, with a rise in transport related carbon emissions of 7% since 2007
- Groundwater quality (Brighton Chalk Aquifer) classified as “poor”
- The city is within a “highly water stressed” region with above regional average water consumption
- The city will need to provide an additional 167ha of various types of open space by 2030 in order to maintain its quantity standards
- The population of Brighton & Hove increased by over 10% in the period between 2001 and 2011
- The city has the highest rate of over-crowding outside London
- The city’s housing remains largely unaffordable to the majority of its residents, with the average property costing over ten times the average income
- The annual affordable housing need is far greater than actual build levels
- The city is ranked as the 66th most deprived in England
- Health inequalities exist throughout the city with marked differences in life expectancy between the most deprived and most affluent areas
- The city exports a high number of workers and needs to develop high value businesses locally to retain higher skilled workers
- The city lacks affordable business accommodation
- There is evidence of the city developing a dual economy, with a high proportion of highly skilled jobs supported by a growing number of lower paid workers
- 8% of the working age population have no qualifications and educational attainment in secondary schools is below average
- The universities are growing along with the increasing requirements for student accommodation

3.112 Positive achievements include:

- An overall reduction in CO₂ tonnes per capita since 2005
- Levels of car ownership lower than national and regional averages
- Levels of travel to work by car lower than national and regional averages
- Year on year reduction of percentage of waste being disposed of at landfill
- The city contains a wealth of diverse designated wildlife sites of international, national and local significance
- The city includes areas of land falling within the South Downs National Park

- The city has an extremely attractive historic built environment including over 3400 listed buildings, 15 Scheduled Ancient Monuments, 6 Registered Parks and Gardens and 34 Conservation Areas.
- The city has one of the most highly qualified adult populations in the country, with 43% having a Level 4 (or equivalent) qualification
- The city contains the Regional Shopping Centre and contains significantly more shops compared to other city's of similar size, including a strong reputation for specialist retailers
- The city is a regional centre for employment and is home to the biggest cluster of creative and digital technology industries in the south east outside London

3.12 Additional changes to the SA report

- 3.121 The process of the Examination in Public highlighted certain sections of the Submission SA Report (BP/014) that may benefit from further work to ensure that the requirements of the SEA Directive have clearly been met. This work is set out in Appendix F of this report and aims to meet the requirements of Regulation 12 (3), Schedule 2 paragraph 8: "An outline of the reasons for selecting the alternatives dealt with".
- 3.122 This section replaces the former Appendix G in the Submission City Plan Sustainability Appraisal February 2013 and helps to show that the City Plan presents the most sustainable option compared to other alternatives.

4. Assessment of Options

4.1 It has been necessary to review the options for the Spatial Strategy and for CP1 Housing Delivery. These reviews have fed into the development of some of the Proposed Modifications. The full assessments of options can be found in Appendix C.

4.2 Spatial Strategy

4.21 **Issue:** the need to increase the housing target through revisions to the Spatial Strategy

4.22 Option 1: No change to Spatial Strategy

Spatial strategy as set out in Submission City Plan Part 1 2013

- Development directed to 8 Development Areas
- Spatial Strategy based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
- Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
- No other development within the urban fringe
- 94% of dwellings delivered within built up area
- Housing target similar to that within the City Plan Part 1 (Submission)

4.23 Option 2: Revised Spatial Strategy

Revised spatial strategy which:

- Directs majority of development to 8 Development Areas
- Based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
- Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
- Spatial Strategy includes the urban fringe as a broad source of potential for housing, suitable for delivering approximately 1,060 dwellings on approximately 31ha (7.5% of total area)
- 85% of dwellings delivered within built up area
- Housing target increased above City Plan Part 1 (Submission)

Table 1: Results of Spatial Strategy options assessment.

Nb. Assessment is based on worst-case scenario (e.g. pre-mitigation), with multiple symbols used to show differentiation between options.

	1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste
1	-?	-	-/+	0/- ?	-/+	-	-?	-	+?	-	+	+	-/+	+	- /+?	+	+	-	-	+	+	-
2	--?	-	-- /+	--?	- /++	-	--?	--	+?	-	++	++	-/+	+	- /+?	++	+	--	--	+	-/+	--

4.24 Summary of impacts

4.25 Option 1

- 4.251 This option will result in positive impacts for the economic objectives, mixed impacts for the social objectives and largely adverse impacts for the environmental objectives, as set out below.
- 4.252 This option will create temporary jobs associated with house-building as well service-sector jobs to meet the needs of the increased population, as well as other jobs including those in health-care and education. Employment opportunities may result in positive impacts for reducing deprivation and impacts positively on health, with employment being one of the wider determinants of health.
- 4.253 Housing will be created to contribute towards the objectively assessed need, also being one of the wider determinants of health. However, the housing target is lower than the OAN and could this could mean that some of the local social impacts, such as over-crowding, increased in-affordability and reduced social mobility are not fully addressed, also impacting on health and possibly deprivation.
- 4.254 Development within the built up area could result in adverse impacts on biodiversity, the setting of the historic built environment and wider landscape, water pollution and climate change adaptation.
- 4.255 Development will increase the consumption of natural resources. It will also increase the likelihood of adverse transport-related impacts, although it is recognised that development within the built up area where access to sustainable transport is good may impact positively upon travel choice. This option may also result in some in-commuting due to the population size being less than that required to meet forecasted economic growth.

4.26 Option 2

- 4.261 This option will result in positive impacts for the economic objectives, mixed impacts for the social objectives and largely adverse impacts for the environmental objectives, as set out below.
- 4.262 This option will create temporary jobs associated with house-building as well service-sector jobs to meet the needs of the increased population, as well as other jobs including those in health-care and education. Employment opportunities may result in positive impacts for reducing deprivation and impacts positively on health, with employment being one of the wider determinants of health.
- 4.263 Housing will be created to contribute towards the objectively assessed need, also being one of the wider determinants of health. Housing development on the urban fringe is more likely to be the type associated with traditional family-type housing, of which there is an identified need locally. However, the housing target is lower than the OAN and this could mean that some local social impacts, such as over-crowding, increased in-affordability and reduced social mobility are not fully addressed, also impacting on health and possibly deprivation.

- 4.264 Loss of open space in the urban fringe is associated with various environmental impacts including possible impacts on biodiversity, landscape setting, water pollution, and climate change adaptation. These impacts can also result from development on previously developed land within the built up area although to a lesser extent. Loss of some of the urban fringe open space sites will be a net loss against the city's assessed quantity standards, thus increasing the pressure on remaining areas of open space. It will also impact adversely against the standards for accessibility. Loss of open space on the urban fringe could also have adverse health impacts, particularly relating to increasing health inequalities for deprived communities, where health issues associated with inactivity and lack of access to open space are more prevalent. It is recognised that access to open space benefits the health of all communities but benefits the health of the least well off the most (Natural England 2012).
- 4.265 Development will increase the consumption of natural resources. It will also increase the likelihood of adverse transport-related impacts, although it is recognised that development within the built up area where access to sustainable transport is good may impact positively upon travel choice. This option may also result in some in-commuting.
- 4.27 Potential for mitigation and overall conclusion**
- 4.271 Neither option meets the OAN in full and therefore neither option will fully address some existing adverse social issues such as over-crowding and inaffordability, although it is recognised that the City Plan is not the only influence over these issues. It is unlikely that these can be mitigated against. Option 2 will result in an increase of housing stock of between 55% and 73% of the assessed need of between 18,000 to 24,000 units which is a significant increase in housing stock and is greater than that associated with Option 1. Option 2 therefore has greater potential for positive impacts than Option 1 against the housing objective, is more likely to address some housing-related social issues and goes further to address the social dimension of sustainable development.
- 4.272 Both options will impact positively on employment and the economy. Option 2 has greater potential for positive impacts mainly due to the higher amount of house-building and increased population which will increase the need for service sector and associated health and education jobs. Employment opportunities provided will also impact positively against objectives for health and deprivation.
- 4.273 Both options are likely to result in adverse environmental impacts. In relation to resource consumption and production of waste, the impacts of the higher population associated with Option 2 are not likely to be significantly different to the impacts associated with Option 1 when put into context of size of the wider population. Impacts are likely to be mitigated through the requirement for new residential development to meet high environmental standards.
- 4.274 Both options are likely to result in adverse transport-related impacts from delivery of housing throughout all areas of the city and the increase in population, and would require mitigation and intervention. There is not considered to be a significant difference between the level of impact between the two options, as although option 2 will potentially result in more journeys locally due to the increased population, and more car-dominated travel in the urban fringe location, it is likely to result in lower levels of in-commuting than option 1 due to a higher local population.

- 4.265 Both options are likely to result in site-specific environmental impacts, although the adverse impacts associated with Option 2 are considered to be more significant than with Option 1 due to development on the urban fringe. This includes potential impacts on biodiversity, landscape, surface water flood risk, and climate change adaptation. With reference to the Urban Fringe Assessment (2014), it is understood that only sites, or parts of sites, where the impacts can be mitigated to an acceptable level have been identified as having potential for residential development, and provided that the mitigation set out in the Assessment is implemented, then these adverse impacts should be minimised.
- 4.266 The adverse social impacts associated with loss of open space on the urban fringe may not be able to be mitigated to an acceptable level, particularly the potential to impact upon health-based deprivation, and it will be essential to ensure that urban fringe sites without development potential are protected and access to them and to the adjacent SDNP is improved in order to minimise any potential health issues.
- 4.267 Overall, Option 2 has greater potential for adverse impacts on the majority of environmental objectives. Those that are of more significance are related to the distribution of development, particularly that which is located within the urban fringe, rather than the increased amount of development and would require mitigation. However, despite the potential for some adverse impacts, Option 2 has greater potential for more significant positive social and economic impacts related to the increased amount of housing delivered, and is considered to go further to address the social and economic dimensions of sustainable development. **Option 2 is therefore considered to be the preferred option.**

4.3 Housing Delivery

4.31 **Issue:** meeting the increasing need for new housing

4.32 Option 1: 13,210 dwellings

- 12,150 from within built up area (including Toads Hole Valley) including:
 - SHLAA capacity on identified sites
 - Small sites with planning permission
 - Increased windfall allowance across plan period
 - Increased mixed use on employment sites
 - Capacity from HRA Estates Regeneration Project
- 1,060 from urban fringe broad area on approximately 31ha in total (as identified in Urban Fringe Assessment Study 2014)

4.33 Option 2 – 24,000 dwellings

- 13,210 as described in option 1
- 5,395 from loss of 54 ha of employment sites¹
- 5,395 from loss of 108 ha of open space within the built up area²

¹ 54ha equivalent of 39% of employment sites in the city. See Appendix C for further details for the types of employment land this includes.

- 4.34 Loss of employment land and loss of open space based on a 50:50 split to achieve the net additional housing required (10,770 units) to meet the upper end of the OAN. Density levels on employment sites and sites of open space calculated as:
- 100 dph for Employment Land
 - 50 dph for Open Space.

Table 2: Results of Housing Delivery Options

Nb: The following assessment is based on worst-case scenario (e.g. pre-mitigation) with multiple symbols used to differentiate between options.

Options/Objectives	1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste
1	-?	-	-	-?	-/+	-	-?	-	?	-	+	+	-/+	+	- /+?	+	+	-	-	0	-/+	-
2	--?	--	--	-?	++	--	--?	--	+?	-	--	--	-- /+	+	--	++	+?	--	--	0	--	--

4.35 Summary of impacts

4.36 Option 1

- 4.361 This option will result in positive impacts for the economic objectives, adverse impacts for the environmental objectives and mixed impacts for the social objectives, including housing delivery, health and deprivation as set out below.
- 4.362 This option retains the existing employment land within the city, helping to retain the economic base and helping to meet the requirements set out in the Employment Land Study 2012. In addition, temporary jobs will be created through house-building as well service-sector jobs to meet the needs of the increased population, although these will be temporary and lower-skilled, as well as other jobs including those in health-care and education. Employment opportunities may result in positive impacts for reducing deprivation and impacts positively on health, with employment being one of the wider determinants of health.
- 4.363 Housing will be created to contribute towards the objectively assessed need, also being one of the wider determinants of health. However, the housing target is lower than the requirement and this could mean that some existing social issues, such as over-crowding, increased in-affordability and reduced social mobility are not fully addressed also impacting on health and possibly deprivation.
- 4.364 Loss of open space in the urban fringe is associated with various environmental impacts including possible impacts on biodiversity, landscape setting, water pollution, and

² 108ha equivalent to 32% of open space within the built up area, e.g. not including open space within the urban fringe or the South Downs National Park. See Appendix C for more details of the types of open space this includes.

climate change adaptation. These impacts can also result from development on previously developed land within the built up area although to a lesser extent. Loss of some of the urban fringe open space sites will be a net loss against the city's assessed quantity standards, thus increasing the pressure on remaining areas of open space. It will also impact adversely against the standards for accessibility. Loss of open space on the urban fringe could also have adverse health impacts, particularly relating to increasing health inequalities for deprived communities, where health issues associated with inactivity and lack of access to open space are more prevalent.

4.365 Development throughout the city will increase the likelihood of adverse transport-related impacts and this option may result in some in-commuting, due to the increased population size being less than that required to meet the forecasted economic growth.

4.37 Option 2

4.371 This will result in positive impacts for the housing objective, mixed impacts for the health objective, and adverse impacts for the deprivation objective. This option will also result in adverse impacts across all economic and environmental objectives. Impacts set out below.

4.372 This option delivers housing to meet full objectively assessed need, which is a significant positive outcome for the housing objective, and is also one of the wider determinants of health. This should help to reduce the likelihood of other issues such as over-crowding and could contribute to reducing in-affordability, although it is recognised that this is largely market driven.

4.373 This option results in a loss of around one third of the existing employment land within the city.³ This will have various adverse impacts, which are considered to be significant, permanent and irreversible such as local job losses, increased unemployment rate, business relocation to outside the city and possibly outside the economic sub-region due to their being a lack of supply in adjoining authorities, reduced inward investment, reduced offer of range of employment-space, would create an absolute shortfall in business premises, resulting in reduced level of local economic growth, a constrained local economy and limiting the city to realise its full economic potential. This option will result in temporary construction related jobs, as well as service sector, health-care and education jobs to meet the needs of the increased population, however these will be temporary and not necessarily the higher value jobs that the city is looking to create. In addition, this option is highly likely to result in a significant increase in levels of out-commuting having transport and associated impacts due to a reduction in local jobs combined with the increased local population seeking employment opportunities.

4.374 This option involves the loss of 31ha (approximately 7.5%) of open space from the urban fringe and an additional 108ha (approximately 32%⁴) of open space from within the built up area. This is associated with various environmental impacts, including possible impacts on biodiversity, landscape setting, water pollution, and climate change adaptation. Loss of some of the urban fringe open space sites identified and loss of all of the open space sites within the built up area will be a net loss against the city's

³ See CP1 Options Paper Assessment for full calculations relating to loss of employment land in Appendix C

⁴ See CP1 Options Paper Assessment for full calculation relating to loss of open space in Appendix C

assessed quantity standards, thus reducing the resource, reducing the ability to meet the accessibility standards, increasing the pressure on remaining areas of open space and going against the recommendations of the Open Space Study (2008) and Update (2010). Loss of open space both within the urban fringe and within the built up area could also have adverse health impacts, particularly relating to increasing health inequalities for deprived communities, where the benefits of access to open space impact greatly upon health.

4.375 In addition to the adverse impacts associated with out-commuting, increased development throughout the city will further increase the likelihood of adverse transport-related impacts.

4.38 Potential for mitigation and overall conclusion

4.381 Option 1 does not meet the OAN in full, which could mean that some existing adverse social issues such as over-crowding and inaffordability are not addressed. It is unlikely that these can be mitigated against. However, Option 1 will result in an increase in housing of between 55% and 73% of the assessed need which is a significant increase in housing stock. Option 2 meets the top end of the OAN therefore has greater potential for positive impacts than Option 1 against the housing objective, and is likely to contribute to reducing some of the existing social issues outlined above.

4.382 Option 1 has greater potential for positive impacts on the employment and economic development objectives than Option 2. Option 2 is likely to result in significant adverse impacts for the local economy, as well as on the local community's health due to reduced employment opportunities and increasing income/employment-based deprivation levels, and these impacts are considered to be permanent, increasing in the long term and are unable to be mitigated against.

4.383 With reference to the Urban Fringe Assessment (2014), it is considered that some of the environmental impacts associated with loss of open space on the urban fringe can be minimised or mitigated to an acceptable level, i.e. those related to biodiversity, landscape, surface water flood risk, and climate change adaptation. It is assumed the similar environmental impacts relating to loss of open space in the built up area could also be mitigated to an acceptable level.

4.384 The impacts of loss of open space as a resource within the urban fringe could more readily be mitigated by existing provision within the SDNP due to its proximity, although the risk for social impacts remains. It is considered highly unlikely that the adverse social impacts associated with loss of open space within the built up area, particularly health and health-based deprivation, could be mitigated against. In addition, it is considered highly unlikely that the open space could be replaced elsewhere in the city due to limitations over land availability, and could not be mitigated by its close proximity to the National Park, in the same way that loss on the urban fringe can be. It will result in an absolute and permanent loss of open space within the built up area that cannot be mitigated against. Both options result in a net loss of the city's open space resource, although the adverse impacts are considered to be significantly greater with Option 2 as this option results in a greater loss and has less potential for mitigation.

- 4.385 Both options are likely to result in adverse transport-related impacts from delivery of housing throughout all areas of the city and the increase in population. The adverse impacts associated with Option 2 are considered to be greater, as this option will result in a larger population, as well as result in out-commuting at levels greater than the in-commuting associated with Option 1.
- 4.386 Overall, the positive social impacts of meeting the OAN are considered to be outweighed by some of the adverse impacts, including those related to loss of employment sites and the impacts this will have upon the local economy which cannot be mitigated against, as well as the impacts on deprivation and the potential for the widening of health inequalities associated with the combined loss of employment opportunities and loss of greater amounts of open space within the urban area. **Option 1 is therefore considered to be the most sustainable option.**

5. Screening Proposed Modifications

- 5.1 A total of 116 proposed modifications have been put forward. A screening exercise of all the modifications has been undertaken, the results of which can be found in Appendix D.
- 5.2 The aim of the screening process is to identify amendments which are considered to make a difference to the previous Sustainability Appraisal findings of the City Plan and are therefore considered to be significant enough to require re-appraisal.
- 5.3 The screening process has identified three main types of effects:
- no impact on any of the Sustainability Appraisal objectives, e.g. modification is of an editorial nature or for clarification/information purposes.
 - a minor positive or negative effect on one or more of the Sustainability Appraisal objectives, but does not change the previous SA findings.
 - a major positive or negative effect on one or more of the Sustainability Appraisal objectives, that results in a change to the previous SA findings and requires re-assessment.
- 5.4 Where a major positive or negative effect has been identified, a full re-appraisal of that policy has taken place. These can be found in Appendix E and summarised in Section 6.
- 5.5 In addition, there are some policies whereby the SA has been revised to ensure it reflects the most up to date version of the policy, even though the screening exercise found that the changes were unlikely to cause any significant changes. This is particularly the case with the Development Area policies, where some of the quantum of development have changed, or to reflect the newly declared Air Quality Management Area (AQMA). This is set out in Section 6.
- 5.6 Of the 116 modifications put forward, only 31 were found to result in the need for re-appraisal, as described above.

6 Summary of Policy Re-assessments

6.1 Policies requiring re-appraisal

6.11 The screening process identified 18 policies that required re-appraisal.

6.12 Five policies had proposed modifications that are linked to the potential for housing delivery on the urban fringe. These policies required reappraisal due to the proposed modification having a major positive or negative effect on one or more of the Sustainability Appraisal objectives:

- Spatial Strategy
- SA4 Urban Fringe
- CP1 Housing Delivery
- CP16 Open Space
- CP17 Sports and Recreation

6.13 A further 8 policies required reappraisal due to the proposed modification having a major positive or negative effect on one or more of the Sustainability Appraisal objectives:

- DA2 Brighton Marina
- DA3 Lewes Road
- DA5 Edward Street and Eastern Road
- DA7 Toads Hole Valley
- DA8 Shoreham Harbour
- SA5 The Setting of the South Downs National Park
- CP3 Employment Land
- CP8 Sustainable Buildings

6.14 In addition, 5 policies were reappraised to ensure that the appraisal refers to the most up to date policy requirements set for these areas, although the modification did not significantly change the SA findings:

- DA1 Brighton Centre and Churchill Square
- DA4 London Road and New England Quarter
- DA6 Hove Station
- SA1 The Seafront
- SA2 Central Brighton

6.15 The full revised appraisal tables for these 18 policies can be found in Appendix E.

6.16 No other policies have been appraised at this stage.

6.2 Summary of re-assessments of policies

6.21 Urban fringe modifications

6.211 The following table summarises the sustainability implications of the proposed modifications that relate to the urban fringe housing potential. This table includes a reference to the specific proposed modification and the main changes. The actual wording of the proposed modification can be found in Appendix D. The full assessments can be found in Appendix E. A discussion of the overall implications follows the table.

Table 3: Impacts of Proposed Modifications related to urban fringe housing allocation

Policy	PM number	Summary of Main Changes to Sustainability Appraisal
Spatial Strategy	PM010	<ul style="list-style-type: none"> • The modifications direct the majority of development to brownfield sites within the built up area but identify the urban fringe as a broad source of potential. • The modifications strengthen the strategy in relation to meeting local housing needs and this has positive implications for SA objective (5) housing, although overall impacts for housing are considered to be mixed, due to the proportion of the OAN to be achieved. • Mixed impacts are also considered to result for other social objectives including health (13) and deprivation (15). • The modifications are considered to potentially result in adverse impacts against objectives 1 (biodiversity), 3 (local distinctiveness/open space), 4 (SDNP), 7 (water pollution/flood risk), 19 (climate change adaptation) and 21 (accessibility).
SA4 The Urban Fringe	PM064	<ul style="list-style-type: none"> • The modifications provide more certainty that residential development will take place in the urban fringe, either through site allocations in Part 2, or prior to Part 2 and this is considered to have a positive impact on the SA objective (5) housing. • The potential for housing in the urban fringe could result in adverse impacts against a range other objectives including objective 1 (biodiversity), 3 (local distinctiveness/open space), 4 (SDNP), 6 (reducing car journeys) 7 (water pollution/flood risk), 13 (health), 15 (deprivation), 19 (climate change adaptation) and 21 (accessibility). • However, as the main thrust of the policy is still considered to be the protection and enhancement of the urban fringe and the policy specifically will not allow development in this location unless any adverse impacts are minimised and mitigated, the modifications are not considered to outweigh the positive aspirations of the policy, and instead results in mixed impacts against the above environmental objectives.

Policy	PM number	Summary of Main Changes to Sustainability Appraisal
CP1 Housing Delivery	PM072	<ul style="list-style-type: none"> • These modifications increase the housing target, refer to the updated and increased Objectively Assessed Need and indicate the anticipated distribution of housing which includes a greater allowance for windfall over the plan period and includes the urban fringe as a broad source of potential. • Although the increased housing target impacts positively against the SA objective 5 (housing), given the anticipated shortfall particularly against the upper end of the range of OAN, the findings against SA objective 5 (housing) and objective 13 (health) have been reduced from significantly positive to positive across all timescales. In addition, as the housing target is not meeting the OAN, some existing social issues (e.g. overcrowding, affordability) may not be addressed and therefore the impacts are considered to be mixed (-/+). • Residential development on the urban fringe could result in a range of adverse impacts including on objective 1 (biodiversity), 3 (local distinctiveness/open space), 4 (SDNP), 7 (water pollution/flood risk), 15 (deprivation), 19 (climate change adaptation) and 21 (accessibility). Some of these could also result from development within the built up area and were identified in the Submission stage SA. • The increased amount of housing to be delivered also adds to the potential for adverse impacts on other objectives including 2 (air quality); 6 (reducing car journeys); and those relating to resource consumption; these were also identified at Submission stage.
CP16 Open Space	PM099, PM101	<ul style="list-style-type: none"> • This modification clarifies the status of the Urban Fringe Assessment and refers to its conclusions in relation to housing potential. This has positive impacts for SA objective (5) housing. • The potential for housing to be delivered on existing sites of open space could impact adversely on a range of other objectives, including biodiversity (1), maintaining local distinctiveness/open space (3), the SDNP (4), pollution to water (7), deprivation (15), climate change (19) and accessibility (21). • However, as the main thrust of the policy is still considered to be the protection and enhancement of the city's open space resource the modification is not considered to outweigh the positive aspirations of the policy, and instead results in mixed impacts against the above objectives.
CP17 Sports and Recreation	PM102	<ul style="list-style-type: none"> • This modification refers to the Urban Fringe Assessment being a material consideration for planning applications prior to Part 2 of the City Plan. The UFA identified one site that is categorised as outdoor sports provision, which is currently un-used. • This modification has limited positive impacts for SA objective (5) housing. • This modification is considered to have negligible effects on

Policy	PM number	Summary of Main Changes to Sustainability Appraisal
		other SA objectives due to the limited extent of the potential loss.

6.212 The impacts of the Spatial Strategy, Housing Delivery, Urban Fringe, Open Space and Sports and Recreation can be considered together, as it is the delivery of housing, including that located within the urban fringe, which results in some of the similar impacts across these policies. It should be noted that the following impacts are prior to any mitigation, e.g. worst-case scenario.

Key

Strong Positive Impact	++
Positive impact	+
No/negligible impact	0 or blank
Adverse impact	-
Strong adverse impact	--
Uncertain impact	?
Mixed impact	-/+

Table 4: Likely impacts of implementation of policies SS, SA4, CP1, CP16 and CP17

	1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste
SS	-	--	-- /+	-	-/+	--	--	--	+?	-	++	++	-/+	0	- /+?	++	+	-	--	0	- /++	--
SA4	- /+?	+	-- /+?	- /+?	+	- /+?	- /+?	-	+?	0	+	+	- /+?	0	- /+?	+	0	-	-/+	0	- /+?	0
CP1	-?	--	--?	-?	-/+	--	--	-	?	-	+	+	-/+	+	- /+?	+	+	+	--	-	-/+	-
CP16	- /++	+	- /++	-?	+	+	- /++	0	0	+	+	0	++	+	-/+	0	0	0	- /++	0	- /++	0
CP17	0	+	+	0	+	+	-	0	0	0	+	0	++	+	++	+	+	0	0	0	+	-

Summary of impacts

6.213 Economic:

Overall, the policies should result in positive impacts for the employment and economic development objectives. This is due to the intrinsic link between house-building, employment opportunities and economic growth and includes temporary jobs created through house-building as well as service-sector, health and education jobs to meet the needs of the increased population. Employment opportunities may result in positive

impacts for reducing deprivation and also impacts positively on health, with employment being one of the wider determinants of health

6.214 Social:

The increased housing target will have positive implications for the housing objective. There are also positive implications arising from delivery of housing for both the health and deprivation objectives, with housing being one of the determinants of health and access to housing one of the measures of deprivation. However, overall the impacts on these objectives are considered to be mixed. This is due to the housing target being less than the Objectively Assessed Need, which may result in some of the existing local housing issues, such as overcrowding and in-affordability, to continue. The loss of open space on the urban fringe also adds to the potential for adverse impacts on the health and deprivation objectives, due to a reduction in open space available for recreation purposes. This may particularly impact upon adjacent communities, some of which suffer from higher levels of deprivation than the rest of the city.

6.215 Environmental

Loss of open space on the urban fringe for housing development could be associated with various adverse environmental impacts including possible impacts on biodiversity, landscape setting, water pollution, and climate change adaptation and will depend on the site developed and how it is developed. These impacts can also result from development on previously developed land within the built up area although to a lesser extent. Loss of some of the urban fringe open space sites will be a net loss against the city's assessed quantity standards, and it is considered unlikely that the total amount lost will be replaced elsewhere in the city due to competing land requirements. This will increase the pressure on remaining areas of open space, which will become more significant in the long term with the increasing population. This loss could also impact adversely against the open space standards for accessibility.

6.216 Although policies SA4, CP16 and CP17 all indicate that sites could be developed for housing, in accordance with the Urban Fringe Assessment findings, the impacts against the environmental objectives discussed above are considered to be mixed overall. This reflects the risk of adverse impact against these objectives, but shows that the policies themselves also have strong levels of protection or requirements and that the main direction of the policy is still: SA4) protection and enhancement of the urban fringe; CP16) retention and enhancement of open space; and CP17) safeguarding and enhancement of sports provision. The policies themselves are clear in specifying that development will not be allowed if adverse impacts cannot be minimised and mitigated and the Urban Fringe Assessment itself only identifies sites or parts of sites where the adverse impacts can be mitigated appropriately and are outweighed by the social benefits from delivering housing.

6.217 Development throughout the city will increase the likelihood of adverse transport-related impacts, due to the increased population, cars owned and journeys made and mitigation and intervention will be required to ensure the road network operates effectively. It is recognised that development within the built up more accessible area could impact positively upon choices around car ownership and travel mode, whereas development in the urban fringe may result in a more car-dominated environment and an increase in localised traffic and associated issues, due to its location and the amount of sustainable

transport services currently available there. Some in-commuting may also occur. Resource consumption, including water and energy is considered likely to increase with a larger population, as will waste generation.

See Section 7 for mitigation.

6.218 Urban Fringe Assessment:

The Urban Fringe Assessment (2014) carried out an assessment of all 66 urban fringe sites with the aim of identifying sites with potential for residential development where mitigation can minimise the adverse impacts to an acceptable level. The Assessment identified 39 sites (or parts of sites) which fall into this category and these findings have fed into proposed modifications for the above policies. Adverse impacts which the Assessment considers can be mitigated on these sites include those relating to biodiversity, open space, landscape setting, heritage assets, and other environmental issues including flood risk. The 39 sites cover a combined area of approximately 30ha (7.5% of the total urban fringe). The other sites, or parts of sites, which make up the remaining 92.5% of the urban fringe, have not been identified as being suitable for residential development as the adverse impacts associated with development on these sites cannot be minimised or mitigated to an acceptable level and are not outweighed by the potential social gains that would be achieved from greater levels of housing delivery.

6.22 Summary of modifications of other policies which changed the previous Sustainability Appraisal findings

6.221 The following table summarises the sustainability implications of the proposed modifications which were found to change the previous SA findings, or where the Sustainability Appraisal has been changed to reflect the proposed modification. This table includes a reference to the specific proposed modification and the main changes. The actual wording of the proposed modification can be found in Appendix D. The full assessment can be found in Appendix E.

Table 5: Impacts of Proposed Modifications

Policy	PM Number	Summary of Changes to Sustainability Appraisal
DA2 Brighton Marina	PM020 PM022	This modification enables viability and deliverability to be considered as grounds for not meeting the requirements of policy point 12: delivery of sustainable energy technologies. This is considered to make the impact more uncertain against SA Objective 18 (maximise sustainable energy use) and change the score from positive, to positive uncertain.
DA2 Brighton Marina	PM019	This modification removes the restriction for development to be below cliff height and requires development to take account of issues surrounding cliff height. This is considered to make the impact uncertain against SA Objective 3 (maintaining local distinctiveness) and change it from mixed positive/negative to negative uncertain; and

Policy	PM Number	Summary of Changes to Sustainability Appraisal
		Objective 4 (protecting the South Downs National Park) changing the score from positive to uncertain.
DA3 Lewes Road	PM026	This modification amends the quantum of housing to be delivered throughout the development area. Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA3 has been updated to ensure it reflects the quantum proposed in the final policy.
DA3 Lewes Road	PM027	These modifications remove the ambition to deliver a zero carbon development on the Preston Barracks and Falmer Released Land sites, and although the screening exercise found this modification alone to not significantly change the score, due to other policy requirements, the review of the SA presents the opportunity to amend any explanatory text.
DA3 Lewes Road	PM028	This modification removes the requirement to meet BREEAM outstanding on one of the Strategic Allocations, meaning that all references to meeting certain standards have been removed from the policy. For consistency with other policies, the policy is now considered to have a negative impact against SA Objective 20 (meeting BREEAM standards).
DA3 Lewes Road	PM025	These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. The SA for DA3 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.
DA5 Edward Road and Eastern Street	PM038	This modification amends the quantum of housing to be delivered throughout the development area. Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA5 has been updated to ensure it reflects the quantum proposed in the final policy.
DA5 Edward Road and Eastern Street	PM041	This modification clarifies that the residential element of the Freshfield Road Business Park and Gala Bingo Hall Strategic Allocation is likely to come forward in the earlier part of the plan period, and that the employment element will come forward in the later part of the plan period. This is considered to improve the short term score against the SA Objective 5 (housing).
DA7 Toads Hole Valley	PM045	There have been numerous modifications to the policy and supporting text. Not all modifications have resulted in a change to the previous SA scores and findings. 1. The modification which removes the requirement to deliver 25,000sqm employment floorspace, replaced by the requirement to reserve a site area for employment purposes is

Policy	PM Number	Summary of Changes to Sustainability Appraisal
		<p>considered to weaken the score against SA objectives 11 and 12 (employment and economic development) and is considered to change the scores from significantly positive to positive.</p> <p>2. The modifications which change the requirements relating to sustainable energy infrastructure are considered to make the score against SA objective 18 (maximise sustainable use) more uncertain, and changes the score from positive to positive/uncertain.</p> <p>3. The modification that removes the specific sustainable building requirements is considered to weaken the score against SA objective 20 (meet BREEAM/CSH) and changes the score from significantly positive to positive.</p> <p>4. The modifications around policy text: “seeks to enhance links to the SDNP” and “provide contributions towards improved pedestrian and cycle links” and “provide contributions towards links to existing parks” all impact on access to/from the site. This is not considered to impact on any scores, however may have some health and/or equalities implications.</p>
DA8 Shoreham Harbour	PM047	The new aim for the Harbour to support large scale zero and low carbon energy technologies is found to have significant positive impacts against SA objective 18 (maximise sustainable energy use) in the longer term.
DA8 Shoreham Harbour	PM051 PM052	The modifications relating to air quality are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, but are not considered to significantly change the previous SA findings against the air quality objective. However, the SA for DA8 has been updated to ensure it reflects the new AQMA designation.
SA5 The Setting of the South Downs National Park	PM065	<p>This policy has changed significantly and is now found to have less significant positive impact on some objectives (biodiversity and water pollution) as many of the former policy requirements are now located within the supporting text where they carry less weight.</p> <p>This is not considered to be negative and reflects the fact that planning decisions are taken by the South Downs National Park Authority.</p> <p>The main thrust of the policy is still to ensure maximum protection of the SDNP and its setting.</p>
CP3 Employment Land	PM075	The policy is now found to have positive impacts against SA Objective 22 (reduction of waste) due to the main modification which allows for waste management facilities to be developed on industrial estates.
CP8 Sustainable Buildings	PM085	The policy is now found to have negligible impacts against SA objective 5 (housing) as the reduction in standards potentially makes residential development more viable and reduces the

Policy	PM Number	Summary of Changes to Sustainability Appraisal
		likelihood of adverse impact against this objective. The impacts on objective 8 (water minimisation), objective 18 (energy reduction) and objective 20 (environmental standards) are still considered to be positive despite the relaxation in environmental building standards.
CP8 Sustainable Buildings	PM086	The policy is now found to have positive impacts against the SA Objective 9 (development of contaminated land) due to the requirement for development to reduce land pollution. The policy is now found to have significant positive impacts against the SA objective 7 (minimise pollution of water) due to the additional requirement that ensures water supply is safeguarded if development is within a groundwater source protection zone.

6.23 Summary of modifications which did not change the previous Sustainability Appraisal findings, but where the SA was updated

6.231 The following table summarises the sustainability implications of the proposed modifications which did not change the previous SA findings, but where the Sustainability Appraisal has been changed to reflect the proposed modification. This table includes a reference to the specific proposed modification. The actual wording of the proposed modification can be found in Appendix D. The full assessment can be found in Appendix E.

Table 6: Impacts of Proposed Modifications

Policy	PM Number	Summary of Changes to Sustainability Appraisal
DA1 Brighton Centre and Churchill Square	PM014	These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however are not considered to significantly change the previous SA findings. However, the SA for DA1 has been updated to ensure it reflects the new AQMA designation and refers to the new policy requirements.
DA4 – New England Quarter and London Road	PM034	This modification amends the quantum of housing to be delivered throughout the development area. Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA4 has been updated to ensure it reflects the quantum proposed in the final policy.
DA4 – New England Quarter and London Road	PM033	The modifications relating to air quality are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, but are not considered to significantly change the previous SA findings against the air quality objective. However, the SA for DA4 has been updated to ensure it reflects the new AQMA designation and refer to the new policy

Policy	PM Number	Summary of Changes to Sustainability Appraisal
		requirements.
DA6 – Hove Station Area	PM043	This modification amends the quantum of housing to be delivered throughout the development area. Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA6 has been updated to ensure it reflects the quantum proposed in the final policy.
DA6 – Hove Station Area	PM044	The modifications relating to air quality are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, but are not considered to significantly change the previous SA findings against the air quality objective. However, the SA for DA6 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.
SA1 The Seafront	PM056	The addition of the wording “minimum” to the 400 homes to be delivered adds a certain degree of uncertainty across various objectives associated with the impacts (positive or adverse) associated with the delivery of this development. The explanatory text to objectives 2 (air quality), 3 (local distinctiveness), 5 (housing), 6 (car journeys), and 8 (minimise water use), is amended to reflect that the housing target is a minimum, and that therefore the positive and negative impacts could be greater.
SA1 The Seafront	PM058	This modification relating to air quality is considered to be of an editorial nature, however the SA for SA1 has been updated to ensure it reflects the new AQMA designation.
SA2 Central Brighton	PM061	The modifications relating to air quality are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, but are not considered to significantly change the previous SA findings against the air quality objective. However, the SA for SA2 has been updated to ensure it reflects the new AQMA designation and new requirement.

7. Mitigation and Recommendations

7.1 Adverse impacts have been identified relating to some of the proposed modifications which will require mitigation. This mitigation is in addition to any that has already been identified in previous versions of the SA.

7.2 List of mitigation

7.3 Spatial Strategy, CP1, SA4 and CP16

Mitigation for development on urban fringe sites:

- Incorporate biodiversity features, such as green roofs, animal/bird boxes, tree-planting, wetlands, creation of new species-rich habitats, translocation of species and improved ecological links such as hedgerows to enhance and result in a net gain in biodiversity, as well as help to adapt to climate change.
- Incorporate features to reduce the need to own a car, such as car-club membership, car-free units etc.
- Ensure the improvement of sustainable transport links, particularly if currently limited
- Compliment the local character of surrounding and adjacent areas and consider the settings of the historic, built and natural environment, with appropriate screening where relevant.
- Incorporate areas of open space, particularly helping to meet any local deficiencies where possible.
- Improve access to remaining areas of open space, including the SDNP.
- Protect remaining sites of open space in the urban fringe as far as possible to ensure ongoing access to open space provision.
- Ensure HIA or similar is carried out to minimise health impacts and maximise health benefits for communities living adjacent to urban fringe sites. In particular, ensure this addresses any potential impacts upon health and lifestyle of existing communities resulting from a loss of recreation space, particularly those in more deprived areas.
- Incorporate features to minimise consumption of natural resources.
- Incorporate features to reduce the risk of surface water flooding and groundwater pollution. In particular, development on Greenfield sites should seek to ensure run-off levels are maintained at Greenfield rates post development.
- Provide construction job opportunities for local people.
- Be complemented by essential services delivered in time with development, such as health, shops and community facilities to facilitate access.

7.4 DA2 Brighton Marina

- High quality design should ensure that strategic views along the coast are enhanced and preserved.
- Development must preserve or enhance the setting of the Kemp Town Conservation Area as well as the views of and from it.
- Projections of buildings should be limited in extent to ensure the setting of the SDNP and views of the SDNP from the city, and vice versa, are not unduly harmed.

7.5 DA3 Lewes Road

- Ensure environmental building standards are achieved in accordance with local policy requirements

7.6 DA7 Toads Hole Valley

- Ensure that improvements to access and pedestrian links resulting from planning contributions are delivered in a timely manner.

7.7 CP3 Employment Land

- To ensure that regulatory procedures reduce any potential environmental or health nuisance from waste sites to the permitted/acceptable level.

The majority of these impacts and mitigation measures are considered to be mitigated through implementation of other citywide policies.

7.8 Recommendations

Table 7: Recommended changes made by the SA at this stage.

Policy	SA objectives and reason for change	Recommended change	City Plan Response
DA2	SA Objective 3 (local distinctiveness) & 4 (protect SDNP). Removal of cliff height restriction could have adverse impacts on adjacent historic built environment and SDNP. New policy wording “that takes account of cliff height issues” considered to address this, but would benefit from further expansion of the point within the Supporting Text.	To include a paragraph in the Supporting Text that expands on policy wording “that takes account of cliff height issues” so that the cliff height issues which need to be addressed are clearly set out, e.g. impact on strategic views, impact on setting of the SDNP, preservation or enhancement of adjacent Conservation Area etc.	New paragraph added to DA2.
DA2	SA Objective 1 (biodiversity) Policy should make reference to recent Marine Conservation Zone designation.	To add to Supporting Text para 3.24 information regarding the recently designated status of the Beachy Head West Marine Conservation Zone. I.e. In November 2013, the Department for Environment, Food and Rural Affairs (Defra) announced the designation of 27 Marine	New text added to DA2.

		<p>Conservation Zones around the UK. This includes the Beachy Head West Marine Conservation Zone which is a thin strip from Brighton Marina to Beachy Head, East Sussex. Marine Conservation Zones (MCZ) have been designated to conserve the diversity of nationally rare, threatened and representative habitats and species. Within each MCZ, the objective is to ensure the features being protected are in a favourable condition.</p>	
DA7	<p>Objective 13 (Health) / Transport. Road safety is an issue, particularly for children and young people (as identified as a sensitive community in the HEQIA). The policy requires road safety concerns to be addressed by development.</p>	<p>Add following sentence to paragraph 3.94 of supporting text: <u>HIA should pay regard to the impacts on sensitive communities as identified in the HEQIA, particularly children and young people, in relation to road safety and accessing the site for educational/recreational purposes.</u></p>	<p>Not included. Considered to be covered adequately by CP9 Sustainable Transport (A2d) and (B5); and CP18 A Healthy City.</p>
CP18	<p>Objective 15 (Deprivation) / Lifestyle. Reduction in open space on urban fringe for recreation/leisure purposes has potential for adverse impacts on some adjacent sensitive communities (particularly those suffering from socio-economic deprivation).</p>	<p>Amend policy point 3 as follows: 3. Require larger developments to demonstrate how <u>they minimise adverse impacts</u> and maximise positive impacts on health within the development or in adjoining areas (where the benefits of new development can be maximised)</p>	<p>Added to CP18 as suggested. (Nb. HEQIA suggestion)</p>

8. Cumulative Impacts

- 8.1 As some of the appraisals for certain policies have changed as a result of the proposed modifications, the cumulative impacts have been re-assessed in order to ensure the impacts of the entire plan are considered together. The summary tables showing the cumulative impacts across all policies can be found in Appendix G.
- 8.2 Overall, although some of the appraisals have changed, with several having greater potential for adverse or uncertain impacts than previous iterations, the cumulative impacts arising from implementation of the post-submission City Plan (with proposed modifications) overall are not considered to be significantly different to those identified at submission stage. In addition, adequate provision for mitigation through implementation of policies is considered to be in place.
- 8.3 Potential significant adverse impacts are still considered to be as follows:
- increase in traffic congestion and associated impacts including air quality, noise and carbon emissions, with this being particularly problematic in central areas and in the morning peak-time.
 - increase in pressure between competing land uses, resulting in increased loss of Greenfield sites, some of which perform an open space function, and associated impacts including visual impacts, and other environmental impacts such as flood risk and climate change adaptation.
 - increased consumption of natural resources, particularly water and the impacts of this on the Brighton Chalk Aquifer.
 - increased pressure on local amenities, particularly open space, which will become more significant as the population increases.
- 8.4 Potential significant positive impacts are still considered to be as follows:
- a significant increase in affordable and non-affordable housing, albeit at a level below the city's objectively assessed need, with the need for ongoing discussions regarding the Duty to Cooperate to continue.
 - increase in amount of land for various employment uses, having economic benefits.
 - improvements in design, quality and sustainability of new development.
 - improvements in access to services, through both increased provision and improved transport infrastructure.
 - delivery of many of the wider determinants of health, including housing and employment opportunities.

9. Monitoring

- 9.1 The revised Monitoring & Implementation Annex 1 to the City Plan sets out a range of indicators to monitor the effects of implementing each policy. In addition, the Submission Sustainability Appraisal set out a range of indicators, some of which are contextual, to monitor the impact of implementing the Plan against the 22 Sustainability Appraisal Objectives. The impacts against some of the objectives are considered to be significant.
- 9.2 The Sustainability Appraisal monitoring table has been updated to take into account representations received on the Sustainability Appraisal during the Regulation 19 consultation, as well as discussions that arose throughout the EIP, in addition to the findings from policy re-appraisals. See Appendix H for full table.
- 9.3 The following list identifies indicators that have been revised or have been newly added since the Submission Sustainability Appraisal was published. These will be reported annually where data is available in the Authorities Monitoring Report.
- 9.31 SA Objective 1 – Biodiversity**
- SQM of habitat or biodiversity features added or lost (citywide) as a result of development (Sustainability Checklist)
- 9.32 SA Objective 3 – Maintaining Local Distinctiveness/Open Space**
- Amount of open space created or lost (citywide) as a result of development (Sustainability Checklist)
- 9.33 SA Objective 5 – Housing**
- House price to income ratio (Land Registry/Nomisweb)
 - % of households considered to be suffering from over-crowding (having one less bedroom than required) (Census)
- 9.34 SA Objective 6 – Reducing Car journeys**
- CO2 emissions per capita from road transport (kt) (DECC)
- 9.35 SA Objective 11 – Employment Creation**
- Number and percentage of in-commuters compared to out-commuters (ONS Annual Population Survey/Census)
- 9.36 SA Objective 15 - Deprivation**
- Percentage of SOA in top 20% most deprived (health domain)

10. Conclusion and Next Steps

10.1 Conclusion

- 10.11 The vast majority of the proposed modifications have had little or no impact on the Sustainability Appraisal. Those that had an impact have resulted in a variety of changes. Some policy requirements have been strengthened against certain sustainability objectives, such as the Development Area requirements relating to air quality improvements, or are now more positive, such as the Sustainable Buildings policy requirements relating to reducing land and water pollution. However some are now found to be less strong such as the removal of the requirements to meet certain sustainability standards in the Development Area policies, or now have greater risk of negative impact against certain sustainability objectives, such as the policies that are linked to the potential for housing in the urban fringe location.
- 10.12 The group of policies that resulted in the most significant changes to the previous SA findings are those related to the potential for housing development on the urban fringe, and in particular policy SA4 The Urban Fringe. Although the main thrust of this policy is still protection and enhancement of the urban fringe, the policy indicates that housing is likely to be delivered in this location. Whilst this brings about positive impacts for the SA Objective for housing, as well as economic and employment benefits, it also brings about potential for adverse impacts across a range of objectives that will require mitigation in order to make the social gains acceptable. It is recognised that the policy makes specific reference to the Urban Fringe Assessment Study (2014) which has thoroughly assessed the potential of each site and has only identified sites or parts of sites as having potential where the adverse impacts can be mitigated.
- 10.13 When all the modified policies are looked at cumulatively alongside the remaining policies within the City Plan, no new significant impacts have been identified that were not already identified by the Submission City Plan Sustainability Appraisal. The adverse impacts include the potential for increased traffic congestion, particularly in the morning peak-time having impacts, increased pressure between competing land uses resulting in an increasing loss of Greenfield sites including urban fringe sites which perform various functions, increased consumption of natural resources, and increased pressure on local amenities, particularly open space. The positive outcomes include a significant increase in housing which is greater than previous versions of the Plan, increase in employment opportunities and economic benefits, improvements in the design, quality and sustainability of new development, and delivery of many of the wider determinants of health. The SA recognises that although the City Plan will result in a significant increase in housing stock, that the housing target is below that identified as required and ongoing negotiations through the Duty to Cooperate will be required in order to secure and meet Brighton & Hove's housing need.
- 10.14 The City Plan is considered to make an important contribution to achieving sustainable development in the city; through prioritising development in certain locations, through the delivery of development to help meet local needs, and through the various requirements that need to be met by new developments. The City Plan seeks to balance the competing requirements of the city in a way that protects the majority of the natural environment and historic built environment whilst meeting some of the

development and other needs of an increasing population. The City Plan includes the range of policies required to ensure that positive outcomes from development are achieved and although there are some inevitable uncertainties and potential for adverse impacts, monitoring is in place to ensure these impacts are measured.

10.2 Next Steps and Consultation

10.21 This Sustainability Appraisal Addendum, which should be read in addition to the Submission City Plan Sustainability Appraisal (February 2013) will be out for consultation alongside the City Plan Proposed Modifications.

10.22 Consultation comments on this Sustainability Appraisal Addendum should be sent prior to 9th December 2014 to:

Email: ldf@brighton-hove.gov.uk

Post: Local Development Team, Room 407-410, Hove Town Hall,
Norton Road, Hove, BN3 3B

Sustainability Appraisal Appendices

Appendix A: Representations received on Sustainability Appraisal Report, February 2013

One response was received from Natural England.

In general, Natural England considers the SA analysis to be reasonable and that appropriate changes to the Plan have been made. However, NE considers some of the monitoring indicators relating to biodiversity to be unhelpful when assessing the impacts of the Plan.

Proposed SA Indicator	NE Comment	Response/Action
Number and area of designated sites (SAC, SSSI, SNCI, LNR, RIGS)	This is unlikely to change significantly through implementation of the Plan.	Agree that this is unlikely to change due to implementation of the Plan. However the LBAP (2013) does set a target to increase the area of locally designated sites, therefore this indicator will help to show what is happening in the city. No change.
Percentage of area of SSSI land in various conditions (e.g. favourable, unfavourable, destroyed etc).	The prime influence on the condition of SSSIs will normally be land management practices, rather than changes driven by the Plan.	Agree that the City Plan is unlikely influence this. Policy DA2 is likely to be the only policy that directly impacts on the SSSI, and the Monitoring and Implementation plan already requires the biodiversity and geodiversity of the Marina to be enhanced, setting a target, in recognition of this. Propose to delete this indicator from SA monitoring indicators, but include in SA as baseline information.
SQM of habitat or biodiversity features added or lost (citywide) <i>(as a result of development)</i>	This relates to the aggregate area of change but tells a limited story, as the quality/value of the losses and gains are important.	Agree that this indicator tells a limited story as it currently is. Information from this indicator is taken from the Sustainability Checklist, therefore more detail regarding the following types of feature added or lost can be included: open water, chalk/flower rich grassland, woodland, vegetated shingle, bird boxes, bat boxes and “others”. In addition, add the wording “as a result of development” to the indicator for clarification.

It is **not proposed to add any other indicators** relating to biodiversity or landscape, as the Monitoring and Implementation Plan contains a number of additional indicators relating to these issues

Appendix B – Maps

Brighton & Hove City Council Sustainability Appraisal

Marine Conservation Zone

 Beachy Head West
Marine Conservation Zone



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**Brighton & Hove
City Council**

 Air Quality Management
Area 2013



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Appendix C Assessment of Options for 1) Spatial Strategy and 2) Housing Delivery

1) Spatial Strategy

Issue: the need to increase the housing target

Option 1: No change to Spatial Strategy

- Spatial strategy as set out in Submission City Plan Part 1 2013
 - Development directed to 8 Development Areas
 - Spatial Strategy based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
 - Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
 - No other development within the urban fringe
 - 94% of dwellings delivered within built up area
 - Housing target similar to that within the City Plan Part 1 (Submission)

Option 2: Revised Spatial Strategy

- Revised spatial strategy which:
 - Directs majority of development to 8 Development Areas
 - Based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
 - Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
 - Spatial Strategy includes the urban fringe as a broad source of potential for housing, suitable for delivering approximately 1,060 dwellings
 - 85% of dwellings delivered within built up area
 - Housing target increased above City Plan Submission

The following scoring system is used with multiples allowed to differentiate between the options. Doubles do not indicate significance of impact.

Positive impact +
 No impact 0
 Adverse impact -
 Uncertain impact ?
 Mixed impact -/+

Scores: based on worst-case scenario – e.g. pre-mitigation.

SA Objective	Summary of effects	Option 1 No change	Option 2 Revised SS
1) Protect and enhance biodiversity	<p>Option 1 Development within the existing built up area will involve development on urban brownfield sites, some of which may have some biodiversity value, or on sites in close proximity to sensitive environments. Development on Toads Hole Valley site may also have some adverse impacts on existing biodiversity. The significance of the impacts would need to be assessed on a site by site basis. Likely that the adverse impacts could be overcome with mitigation.</p> <p>Option 2 In addition to Option 1, development on the urban fringe, where the majority of sites are located within the Nature Improvement Area, and some of which include sensitive habitats or species, are all likely to involve some loss of biodiversity, the significance of which would need to be assessed on a site by site basis. Option 2 is likely to have a greater adverse impact on biodiversity than option 1 and would require greater levels of mitigation in order to achieve a net gain in biodiversity, although it is understood that the Urban Fringe Assessment has only identified sites where mitigation can be achieved. Neither option is considered to significantly or adversely effect the integrity of a European site.</p>	-?	--?
2) Improve air quality	<p>Option 1 Majority of development directed to the built up area where access to existing modes of sustainable transport are good. This may impact upon car ownership and transport choice. However some of the urban area is located within the AQMA 2013, within which air quality has shown little improvement over the last 10 years. The scale of development anticipated at Toads Hole Valley may have slight localised air quality impacts, and require more car journeys to be made due to its location, although air quality in this location is currently good. This option will result in a lower amount of housing than option 2, and therefore will result in a lower population, and presumably lesser amounts of cars owned/trips made. However, the trend which suggests in-commuting for employment purposes now exceeds out-commuting is anticipated to increase if the city's predicted economic growth forecast is achieved, and the amount of new homes needed to provide the equivalent amount of new workers is not provided, and this will have various transport related impacts, including air quality.</p> <p>Option 2</p>	-	-

SA Objective	Summary of effects	Option 1 No change	Option 2 Revised SS
	<p>Many of the impacts are as described in option 1. The majority of development is located within the urban area in addition to Toads Hole Valley and therefore these impacts will be the same. Delivery of 1,060 housing units across the urban fringe may have slight localised impacts, however are unlikely to be significant as air quality in these locations is currently good. The increased population compared to option 1 is likely to result in more cars owned/trips made throughout the city, however this is considered to be off-set by the contribution this housing will make towards meeting the population required to meet the predicted economic growth forecasts, and therefore could help to minimise the need for in-commuting.</p> <p>Overall, the impacts on air quality are considered to be similar.</p>		
3) Maintain local distinctiveness	<p>Option 1 Development within the built up area has potential for adverse impact on heritage assets and their settings. Development within the built up area will increase the pressure on the existing open space resource and it is considered unlikely that the increasing open space needs of the increased population will be met. Development on Toads Hole Valley, which is a privately owned site, will include creation of new publically accessible open space which will have positive implications.</p> <p>Option 2 Impacts as described above. In addition, development on urban fringe sites could result in a net loss or a net gain in publically accessible open space on a site by site basis. This depends on their current ownership, whether they currently form part of the assessed open space standards, and whether the development will incorporate new open space provision. However, overall there is likely to be a total net loss of open space in the urban fringe.</p> <p>Overall the impacts associated with option 2 are considered to be worse.</p>	-/+	--/+
4) Protect South Downs	<p>Option 1 The majority of development will be directed to the built up area, whereby landscape upon the SDNP are considered to be minimal, with the exception of the Brighton Marina Development Area. There may be some landscape impacts arising from development on Toads Hole Valley.</p> <p>Option 2 This option will result in sites on the urban fringe being developed. Some of these sites act as a buffer between the built up area and the South Downs National Park and may impact upon the landscape character of the SDNP. Landscape impacts would need to be assessed on a site by site basis.</p> <p>Overall the impacts associated with Option 2, and would require mitigation.</p>	0/-?	--?
5) Provide decent, affordable housing	<p>Neither option meets the full OAN. Therefore although both options will have positive implications for this objective as will result in housing, both may also add to existing issues around a lack of housing including increasing in-affordability, over-crowding and reduced social mobility.</p> <p>Option 2 has greater potential for positive impact as it will result in a greater amount of housing. In addition, housing located within the urban fringe is more likely to be the type associated with family housing, for which there is an identified need locally.</p>	-/+	-/+
6) Reduce amount of car journeys	<p>Option 1 Majority of development directed to the built up area where access to existing modes of sustainable transport are good. This may impact upon car ownership and transport choice. The scale of development anticipated at Toads</p>	-	-

SA Objective	Summary of effects	Option 1 No change	Option 2 Revised SS
	<p>Hole Valley likely to have some local transport related impacts and require more car journeys or result in higher than average car ownership levels due to its location. This option will result in a lower amount of housing than option 2, and therefore will result in a lower population, and presumably lesser amounts of cars owned/trips made. However, the trend which suggests in-commuting for employment purposes now exceeds out-commuting is anticipated to increase if the city's predicted economic growth forecast is achieved, and the amount of new homes needed to provide the equivalent amount of new workers is not provided, and this will have various transport related impacts.</p> <p>Option 2 Many of the impacts are as described in option 1. The majority of development is located within the urban area in addition to Toads Hole Valley and therefore these impacts will be the same. Delivery of 1,060 housing units across the urban fringe was found by the Strategic Transport Assessment to result in localised transport impacts and may result in a higher than average car ownership levels due to their location.</p> <p>The increased population compared with option 1 is likely to result in more cars owned/trips made throughout the city, however this is considered to be off-set by the contribution this housing will make towards meeting the population required to meet the predicted economic growth forecasts, and therefore could help to minimise the need for in-commuting.</p> <p>Overall, the impacts on car journeys and transport impacts are considered to be similar.</p>		
7) Minimise risk of pollution to water	<p>Option 1 Increased urbanisation throughout the city could increase the risk of surface water flooding, with many areas of the city assessed through the SFRA as having some element of flood risk. Currently the Water Framework Directive status of the aquifer is poor, and development throughout the city could harm any improvement to this status. In addition, many sites within the city fall within either a zone 1 inner, zone 2 outer or zone 3 catchment groundwater source protection zone. The closer the activity to the source, the greater the risk of contamination. The actual impacts of development would need to be assessed on a site by site basis.</p> <p>Option 2 Impacts as described under option 1. In addition, open space performs a natural function in respect of absorption of water. Loss of any type of open space on the urban fringe may increase the risk of surface water flooding elsewhere. Development on the urban fringe could also impact on the recharge of the aquifer which underlays the city and is an important source of public water supply.</p>	-?	--?
8) Minimise use of water	Both options will result in new development, will result in an increase in local population, which will result in an increase in water consumption. The greater the population, the greater consumption will be. It is acknowledged that the standards applicable to new residential development will ensure that water consumption is minimised, however it is understood that there are no longer any additional requirements to achieve higher standards on Greenfield sites.	-	--
9) Promote development of contaminated land	<p>Options 1 and 2 Development within the urban area has potential for remediation of contaminated land and will depend on the site developed.</p> <p>Option 2 Although there are sites within the urban fringe that are known to be significantly contaminated due to former uses</p>	+?	+?

SA Objective	Summary of effects	Option 1 No change	Option 2 Revised SS
	(e.g. Sheepcote Valley) it is considered unlikely that these will be brought for development prior to other sites mainly due to the costs involved with remediation and the impact this will have on viability.		
10) Manage coastal defences	Both options will result in delivery of housing in coastal locations (DA2 and DA8) that have been assessed by the SFRA as high risk of coastal flooding (Level 3a)	-	-
11) Employment: balance needs of tourists, residents and businesses	<p>Option 1 Delivery of housing and house-building is strongly linked to economic growth. This option will result in temporary construction-related jobs and permanent service-sector jobs to meet the needs of an increased population, as well as additional local workers to help meet the forecasts in economic growth.</p> <p>Option 2 This option will result in around an additional 2000 units of housing compared to Option 1 and therefore this option has greater potential for stronger positive impacts for this objective.</p>	+	++
12) Support economic development	See objective 11.	+	++
13) Improve health	<p>Option 1 Housing is one of the wider determinants of health. This option will deliver housing and will therefore have positive implications towards this objective. However, this option does not meet the OAN and therefore could exacerbate local issues such as increased house-prices, increased inaffordability and increased levels of over-crowding, all of which impact upon health.</p> <p>Option 2 This option will deliver a greater amount of housing than option 1, including affordable housing and will make a greater contribution towards meeting the city's housing requirements. This option is more likely to deliver greater levels of family-type housing, in the urban fringe location. This option still does not meeting the OAN and could therefore still exacerbate the issues as described under option 1, although to a lesser extent than option 1. This option will result in loss of open space on the urban fringe, some of which is accessed for recreation purposes which has strong links to health. The loss of this open space may have some localised impacts on the health of adjacent communities, as well as potentially reducing the ability to meet the accessibility standards for certain types of open space (particularly Natural/Semi-Natural) in the west of the city in particular. However, it is recognised the land area with development potential across the urban fringe equates to only 7.5% of the urban fringe total area, with the vast majority remaining as different types of open space. Overall the impacts associated with both options are considered to be mixed.</p>	-/+	-/+
14) Integrate health and community safety	Both options will provide the opportunity to address community safety concerns. There are not considered to be any additional health or safety concerns with regards to the location of development within the urban fringe.	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Option 1 This option will result in the delivery of housing which will have positive impacts on reducing housing based deprivation and overall deprivation, with the Housing domain making up approximately 9% of the weighting for the overall deprivation (Index of Multiple Deprivation). Whether the delivery of housing will have positive impacts on existing deprived communities is considered to be unknown and will depend largely on whether new housing</p>	+?	-/+?

SA Objective	Summary of effects	Option 1 No change	Option 2 Revised SS
	<p>benefits existing communities. New job opportunities will be created, which again may benefit existing deprived communities, but again will depend on take-up.</p> <p>Option 2 As with option 1, this option will result in the delivery of housing, which will have positive impacts on reducing housing based deprivation and overall deprivation as described under option 1. However, this option results in an 7.5% loss of open space situated on the urban fringe. Access to open space has been linked to reducing health inequalities, with access to open space benefiting all communities but benefitting deprived communities the most (Natural England 2012). It is these communities where long term health conditions such as obesity, heart disease and diabetes are more prevalent, particularly in those that have no or limited access to green open space. In some cases, these urban fringe sites are adjacent to some of the city's most deprived communities and in these cases loss of this open space could result in a widening of health inequalities. The impacts are therefore considered to be mixed.</p>		
16) Engage local communities	Both options will provide opportunities to engage with local communities. Additional engagement would be likely resulting from housing development in the urban fringe location.	+	++
17) Make the best of previously developed land	<p>Both options direct the majority of development to the built up area and therefore it can be assumed that the best of previously developed land will be made in this location.</p> <p>It is understood that the need for development is due to the need to meet the increasing housing need, and is in addition to and not instead of developing within the built up area, and therefore this does not mean that the best use of land within the built up area has not been made.</p>	+	+
18) Sustainable energy	Both options will result in new development, will result in an increase in local population, which will result in an increase in energy consumption. The greater the population, the greater consumption will be. It is acknowledged that the standards applicable to new residential development will ensure that energy consumption is minimised, however it is understood that there are no longer any additional requirements to achieve higher standards on Greenfield sites.	-	--
19) Taking account of the changing climate	<p>Option 1 This option involves development along the coastal frontage in areas at higher risk of coastal flooding, which is likely to increase as a result of climate change. This option also involves the loss of a Greenfield site (Toads Hole Valley), with open and greenspaces playing an important role in absorbing water and regulating urban temperatures.</p> <p>Option 2 In addition to Option 1, this option involves the loss of additional Greenfield sites on the urban fringe. Open space will play an increasingly important role in adaptation to climate change, with open space helping to absorb water, therefore reducing flood risk but also maintaining water supply, and also help to maintain urban temperatures and have been documented to reduce urban temperatures by 1-2 degrees Celsius.</p>	-	--
20) Meet BREEAM / Code for Sustainable Homes	All development is required to meet various environmental standards. There is no longer any difference in the local requirements for Greenfield sites.	+	+
21) Increasing accessibility	<p>Option 1 The majority of development is within the built up area, where there is good existing access to services and</p>	+	-/+

SA Objective	Summary of effects	Option 1 No change	Option 2 Revised SS
	<p>facilities. A strategic development at the Toads Hole Valley site could increase access to certain services for residents in that area of the city although will be dependent on the types of development that come forward. Overall, the impacts are considered to be mixed.</p> <p>Option 2 Development within the built up area will have good access to existing employment opportunities, as well as other services and facilities as described under Option 1. Loss of open space within the urban fringe however will reduce access to open space. In addition, housing distributed throughout the urban fringe may have limited access to services and a wide distribution on small sites is unlikely to result in associated local services (in comparison with development on 1-2 larger sites).</p>		
22) Reduction of waste	Both options will result in an increase of waste, associated with the increased population. The impacts of option 2 will be greater as this is associated with a larger population than option 1.	-	--

2) Housing Delivery - CP1 Options

Issue: Meeting the local housing need

Option 1 – 13,210 units

Includes:

- 12,150 from within built up area (including Toads Hole Valley) including:
 - SHLAA capacity on identified sites
 - Small sites with planning permission
 - Increased windfall allowance across plan period
 - Shoreham harbour regeneration
 - Increased mixed use on employment sites
 - Capacity from HRA Estates Regeneration Project
- 1,060 from urban fringe broad area on approximately 31ha in total (as identified in Urban Fringe Assessment Study 2014)

Option 2 - Meeting the upper end of Objectively Assessed Need (24,000 units)

- 13,210 as described in option 1
- 5,395 from loss of 54 ha of employment sites (equivalent to approximately 39% of total considered available – see below)
- 5,395 from loss of 108 ha of open space within the built up area (equivalent to a approximately 32% of total considered available – see below)

Loss of employment land and loss of open space based on a 50:50 split to achieve the net additional housing required (10,770 units) to meet the upper end of the OAN. Density levels on employment sites and sites of open space calculated as:

- 100 dph for Employment Land
- 50 dph for Open Space.

On the basis of a 50:50 split between losses of Employment Sites and losses of Open Space sites to achieve an additional 10,800 units:

- 5,395 divided by 100dph = 54 ha requirement for Employment Land
- 5,395 divided by 50dph = 108 ha requirement for Open Space

Employment Land

Employment Land lost would be from a combination of:

- Safeguarded sites (CP3) (current total of 42ha)
- Strategic Allocations within Development Areas (current total of 97ha)

Total considered “available” for purposes of this assessment = 139ha
54ha of this employment land is equivalent to 39% loss of the above two types of employment land.

Employment sites that are defined as mixed use development sites (current total of 6ha) and unallocated sites (total ha unknown) are not proposed to be included within the overall total of Employment Land considered “available” to be lost to housing for the purpose of this assessment as these are already either in the SHLAA or have been included within the windfall allowance.

Open Space

Open Space lost would be from the following typologies of open space within the **built up area**, and does not include that as assessed with the Urban Fringe Assessment (as this has already been subject to an assessment), nor that which is situated within the South Downs National Park (as this cannot be included within Brighton & Hove’s City Plan).

Open Space considered to be “available” for the purposes of this assessment that is within the built up area includes:

- Natural & Semi Natural (total in BUA 125 ha)
- Parks & Gardens (total in BUA 145ha)
- Outdoor Sport (total in BUA 54ha)
- Children and young people (total in BUA 10ha)

Total “available” = 334ha within the built up area

For the purpose of this assessment, the open space typologies of amenity greenspace, cemeteries and allotments are not proposed not to be included in the potential types of open space lost.

- Amenity greenspace generally includes small pockets of open space within existing areas of housing as well as includes grass verges along road-sides. Some of the existing amenity greenspace is likely to be lost to housing through the HRA Estates Regeneration Programme, which has already been counted within the housing target.
- The council has a statutory duty to provide cemeteries and allotments. If they were removed they would have to be replaced on a like for like basis elsewhere in the city.

For information: the following table indicates the amounts of open space situated within the urban fringe and SDNP which have not been included:

Open Space Typology	Overall total (ha) (in Open Space Study)	Amount in urban fringe (approximate)	Amount in National Park (approximate)	Remaining Total (ha)
Nat/semi-nat	709	105	479	125
Parks and Gardens	232	33	54	145
Outdoor Sport	118	27	37	54
Children and Young People	11	0	0.72	10
Total	1070	165	571	334

108ha of open space is equivalent to 32% loss of the above types of open space within the built up area.

Scoring System

The following scoring system is used with multiples allowed to differentiate between the options, and do not reflect significance.

Positive impact	+
No impact	0
Adverse impact	-
Uncertain impact	?
Mixed impact	-/+

Note: Scores are based on worst-case scenario – e.g. pre-mitigation.

Assumptions:

- There are no restrictive covenants, or other restrictions on either land in open space uses or land in employment uses preventing the change of use to housing.

SA Objective	Summary of effects	Option 1	Option 2
1) Protect and enhance biodiversity	<p>Option 1 Development within the existing built up area will involve development on urban brownfield sites, some of which may have some biodiversity value. Development on existing Greenfield sites, including Toads Hole Valley and the various sites within the urban fringe, the majority of which are located within the Nature Improvement Area, are all likely to involve some loss of biodiversity, the significance of which would need to be assessed on a site by site basis.</p> <p>Option 2 Loss of additional open space, within the built up area, particularly that which is classified as Natural/Semi-Natural, will result in loss of biodiversity, the significance of which would need to be assessed on a site by site basis. Loss of open space within the built up area could lead to further habitat fragmentation and loss of green corridors which facilitate movement of biodiversity. The greater the loss the greater the significance the adverse impact is likely to be.</p>	-?	--?
2) Improve air quality	<p>Option 1 This option could result in over 11,000 more cars owned within the city (based on 0.86 cars/household, Census 2011). This amount of additional cars, and associated journeys is likely to have an adverse impact on air quality. Approximately 85% of housing is located within the built-up area and this may positively influence decisions on car ownership/journey choice. However, part of the city is designated as an AQMA and location of housing within the built up area could still adversely impact upon air quality. Housing located within the urban fringe, which generally has better air quality than central areas, is perceived as currently less accessible by sustainable transport means, and this could result in more journeys being made by car, which may have localised air quality impacts. This option may result in in-commuting, (due to less housing being delivered than needed to meet forecasted economic growth) which could also add to air quality issues.</p> <p>Option 2 This option could result in over 20,000 more cars owned in the city (based on Census 2011 figures). The additional 9000</p>	-	--

SA Objective	Summary of effects	Option 1	Option 2
	<p>cars compared to Option 1, would be located within the built up area (due to housing located on sites of open space/employment sites. Although this location may impact on travel/ownership choice through availability of more sustainable modes of transport, this could significantly and adversely impact upon air quality in the built up and central areas, which is already within a declared AQMA.</p> <p>Open space itself performs an environmental function, e.g. trees can reduce particulate pollution and therefore loss of open space would exacerbate any air quality issues, including through increased travel to reach open space.</p> <p>Loss of employment sites to housing is highly likely to result in an increase in out-commuting for employment purposes, as the city's economic opportunities would not be able to meet the needs of the working age population, also adversely impacting on air quality.</p>		
3) Maintain local distinctiveness (including open space)	<p>Option 1 The majority (85% of development) is located within the built up area. Development in this location could impact on the existing townscape, including heritage assets. Development within the urban fringe will incorporate loss of open space, some of which is publically accessible and some of which is privately owned. Development on public open space that forms part of the assessed quantity is an absolute loss of open space and goes against the recommendation of the Open Space Study. Development on private open space that was not part of the assessed quantity could result in a net gain if open space is included as part of a scheme. However, overall this gain in open space is not considered to outweigh the loss. The loss of open space of certain typologies (in particular Natural/Semi-Natural) in the west of the city will make it even harder to meet the locally assessed need for accessibility, as well as make it more difficult to meet Natural England's ANGst Standards. The amount of development associated with this option will increase the local population, and this creates a greater need for open space provision to meet the increased population (i.e. an additional 13,230 homes would result in 167ha of additional open space being required to meet the increased total population's needs). It is considered unlikely that the increased population's open space needs will be met due to competing land requirements.</p> <p>Option 2 Impacts for development on the urban fringe as described under option 1. In addition, this option would require a loss of 108 hectares of open space within the built up area, equivalent to 32% of open space (as described as "available" under Option 2 description). This goes against the recommendations of the Open Space Study 2008 and Study Update 2011. It has been calculated that 303ha of additional open space would be required to meet the needs of the population associated with an additional 24,000 homes. This would be in addition to the loss of 108ha of open space to housing. It is considered highly unlikely that this amount of additional open space will be created within the city. The loss of open space within the built up area would also increase the time taken to travel to access open space, and thus make it increasingly difficult to meet the required standards for access for various typologies, including those associated with Natural England's ANGst standards. Loss of open space within the built up area would also impact on townscape and streetscape in some locations. The conversion of employment sites to housing could have positive implications for this objective, e.g. by improvements to townscape/streetscape in some areas, however these are considered to be outweighed by the impacts of loss of open space.</p>	-	--
4) Protect South	Option 1 and Option 2	-?	-?

SA Objective	Summary of effects	Option 1	Option 2
Downs	Both options will result in sites on the urban fringe being developed. Some of these sites act as a buffer between the built up area and the South Downs National Park and may impact upon the landscape character of the SDNP. Landscape impacts would need to be assessed on a site by site basis.		
5) Provide decent, affordable housing	<p>Option 1 This option will result in delivery of housing and is therefore considered to be positive towards this objective. The option will result in affordable housing and types of housing that are known to be required locally, e.g. potential for family type housing in the urban fringe location. However, the OAN has been assessed in the Sussex Coastal Assessment 2014 as a range falling between 18,000 to 24,000. Delivery of 13,210 homes is equivalent to 55% of the upper end and 73% of the lower end of the requirement. A lack of housing supply could result in various adverse impacts such as over-crowding, increasing housing in-affordability, reduced competition in the housing market (e.g. keeps rental prices high), and reduced social mobility (e.g. young people living at home for longer and older people unable to downsize). These are current local issues, although it is accepted that these issues are largely market driven and that local housing policy may not influence them. Therefore, overall, the impacts on this objective are considered to be mixed.</p> <p>Option 2 This option would meet the higher end of the OAN for housing and therefore has the potential for the most significant positive impact for this objective.</p>	-/+	++
6) Reduce amount of car journeys	<p>Option 1 This option could result in over 11,000 more cars owned within the city (based on 0.86 cars/household, Census 2011). This amount of additional cars, and associated journeys is likely to have an adverse impact on this objective. Approximately 85% of housing is located within the built-up area and this may positively influence decisions on car ownership/journey choice. Housing located within the urban fringe, is perceived as less accessible by sustainable transport means, and this could result in more journeys being made by car. This option may result in in-commuting. The Annual Population Survey 2011 showed there to be little difference between in and out commuting (net out-commuting of 111). Based on the Experian Projections of 12% economic growth, the Housing Requirements Study 2012 suggested that an increased population associated with approximately 15,000 homes would be required to meet this forecasted growth in employment. This suggests that this option may result in some in-commuting for employment purposes.</p> <p>Option 2 This option could result in over 20,000 more cars owned in the city (based on Census 2011 figures), which would include an additional 9,000 more within the built up area (due to housing located on sites of open space/employment sites) than option 1. Although housing in the built up area may be more accessible and impact on travel/ownership choice through availability of more sustainable modes of transport, this option is considered to significantly and adversely impact upon this objective. This option is also likely to result in a significant amount of out-commuting through loss of 39% of the city's employment land and associated local employment opportunities, combined with the additional workers associated with a higher population. This option will also lead to a reduction in the accessibility of open space, potentially leading to more and longer journeys being made to access open space.</p>	-	--
7) Minimise risk of pollution to	<p>Option 1 Open space performs a natural function in respect of absorption of water. Loss of any type of open space on the urban</p>	-?	--?

SA Objective	Summary of effects	Option 1	Option 2
water	<p>fringe may increase the risk of surface water flooding elsewhere in the city. Development on the urban fringe could impact on the recharge of the aquifer which underlays the city and is an important source of public water supply. Currently the Water Framework Directive status of the aquifer is poor, and development could harm any improvement to this status. In addition, many sites within the city fall within either a zone 1 inner, zone 2 outer or zone 3 catchment groundwater source protection zone. The closer the activity to the source, the greater the risk of contamination. The actual impacts of development would need to be assessed on a site by site basis.</p> <p>Option 2 In addition to the impacts described under option 1, loss of open space leading to increased urbanisation within the built up area increases the risk of surface water run-off and flooding and pollution further within the city. The SFRA describes many areas of the city that are already susceptible to surface and groundwater flooding.</p>		
8) Minimise use of water	<p>Options 1 and 2. Delivery of housing will increase water consumption, due to an increased population with greater consumption associated with Option 2. Development on Greenfield sites are no longer required to achieve higher environmental standards (see CP8) and therefore no assumption can be made that houses in these locations either on the urban fringe or open space within the built up area would be more sustainable than those on PDL.</p>	-	--
9) Promote development of contaminated land	<p>Option 1 Development of some sites within the built up area may result in remediation of contaminated land although this is fairly uncertain. Option 2 This option has the potential for greater positive impacts as land in previous employment uses may have more potential for remediation, although this is uncertain and will depend on former uses.</p>	+?	+?
10) Manage coastal defences and minimise risk of coastal flooding.	<p>Option 1 & 2 Both options will result in delivery of housing in coastal locations (DA2 and DA8) that have been assessed by the SFRA as high risk of coastal flooding (Level 3a)</p>	-	-
11) Employment: balance needs of tourists, residents and businesses	<p>Option 1 Delivery of housing and house-building is strongly linked to economic growth with the equivalent of 2 jobs created for a year per every house built (DCLG analysis). This option will therefore result in temporary construction-related jobs and permanent service-sector jobs, as well as jobs in healthcare and education sectors to meet the needs of an increased population. Based on Census 2011 data and a ratio of 1.15 workers (in all sectors) per household, this option could result in an increase of around 15,000 workers (across all sectors). This option maintains protection of existing B-use class employment sites to remain in employment uses, helping to meet the economic needs of the city, although it is recognised that limited housing supply can constrain economic growth through limiting economic mobility.</p> <p>Option 2 Using Census data ratios, this option could generate an additional 27,000 workers (across all sectors). Delivery of housing will result in some gains for this objective as described above, through the benefits to the economy associated with house-building. However, these will be short-term and temporary. In addition, service sector jobs would be created to meet the</p>	+	--

SA Objective	Summary of effects	Option 1	Option 2
	<p>needs of the increased population, as well as jobs in health and education, however with the associated population increased with 24,000 homes it becomes more uncertain how the city will accommodate these requirements and it becomes more questionable whether the city has the supply of land to meet these requirements.</p> <p>Of most significance, this option would result in the permanent loss of B-use class employment opportunities resulting from the loss of B-use class employment sites to housing. This is considered to be adverse for this objective, will be a permanent loss and will become more significant in the long-term. The loss of B-use class employment sites is against the recommendation of the Employment Land Study update which recommends an additional 155,000sqm of B-use class employment floorspace will be required, equivalent to approximately 18ha of land, to meet the jobs-growth forecast (of B-type jobs) and to facilitate economic growth. The loss of 54ha of the existing available employment land would result in a significant loss of existing jobs and would severely restrict the ability of the new population to find local jobs, having a wide range of adverse impacts including increasing the unemployment rate and income/employment deprivation and increasing the need to commute out of the city.</p>		
12) Support economic development	<p>Option 1 Delivery of housing and house-building is strongly linked to economic growth, as described under objective 11. This option will result in temporary construction-related jobs and permanent service-sector jobs, as well as jobs in healthcare and education sectors to meet the needs of an increased population. This option maintains protection of existing B-use class employment sites to remain in employment uses, helping to meet the economic needs of the city, although it is recognised that limited housing supply can constrain economic growth through limiting economic mobility. This option is in accordance with the recommendations of various local and sub-regional studies and strategies which aim to facilitate economic growth and built a strong and resilient economy.</p> <p>Option 2 In addition to impacts on jobs described under Objective 11, there would be significant adverse impacts to the local economy associated with the loss of B-use class employment sites. Possible impacts include: increase in the unemployment rate, reduced range of different type and size of employment premises, an absolute shortfall in employment premises and a capacity constraint, potential increased inaffordability of business premises, the city becoming less attractive as a business location and reduced inward investment, reduced ability for diversification of the local economy, increased relocation to other locations. All of these possible impacts could result in a constrained local economy, would significantly and permanently restrict future economic growth and inhibit the city from realising its full economic potential. The adverse impacts are likely to affect the economy of the Greater Brighton economic region (e.g. Worthing, Adur, Lewes) as it is unlikely that Brighton-based businesses would be able to re-locate to any of these neighbouring authorities due to their lack of land supply and suitable business premises, with it being recognised that the city is the main economic centre for the sub-region. This option would not meet any of the local issues identified, such as there being a current existing lack of high quality office accommodation and goes against local economic objectives such as creating higher-value, higher-level jobs. This option also goes against the recommendations and objectives of the Employment Land Study 2012, the refreshed Economic Strategy 2014, the Local Economic Partnership and the Coast to Capital Strategic Economic Plan 2014. The Employment Land Study in particular provides a robust assessment of the predicted economic growth of the city, and the land requirements that would be needed to facilitate this growth.</p>	+	--

SA Objective	Summary of effects	Option 1	Option 2
13) Improve health	<p>Option 1 Housing is one of the wider determinants of health. This option will deliver housing including affordable housing which make a positive contribute towards meeting the city's housing requirements. However, not meeting the OAN could result in increased house-prices, increased inaffordability and increased rates of over-crowding, all of which are existing local issues. This option will result in loss of open space on the urban fringe, some of which is accessed for recreation purposes which has strong links to health. The loss of this open space may have some localised impacts on the health of adjacent communities, as well as potentially reducing the ability to meet the accessibility standards for certain types of open space (particularly Natural/Semi-Natural) in the west of the city in particular, although it is recognised that the amount of open space from the urban fringe with development potential is equivalent to only 7.5% of the total urban fringe. Overall the impacts associated with this option are therefore considered to be mixed.</p> <p>Option 2 As described above, housing is one of the determinants of health. This option will meet the OAN for housing, and this could have positive impacts on housing affordability, although this is mainly market driven, as well as having potential for positive impacts in relation to over-crowding and other local issues. The impacts described for loss of open space on the urban fringe are described in option 1. In addition, this option will also result in loss of 108 ha open space within the built up area equivalent to 32% of the total available within the built up area. There are numerous health issues that are associated with a lack of open space that are of relevance locally including: obesity, inactivity and linked illnesses such as cardio-vascular disease and type 2 diabetes, and stress and mental illness. Certain parts of the city are already deficient in certain types of open space and do not meet the local requirements relating to access. Any loss of open space will exacerbate existing deficiencies and have associated health impacts. Employment is one of the most strongly evidenced determinants of health. Employment status and the nature of work can have direct impacts on physical and mental health and life-expectancy. The loss of employment opportunities will significantly impact on the health of local population. In addition, other potential impacts including reduced air quality and increase in road related traffic noise will also adversely impact on health, with these impacts being greater with option 1. Overall, the impacts are also considered to be mixed.</p>	-/+	-/+
14) Integrate health and community safety	<p>Options 1 and 2 Both options will provide opportunities to impact positively on this objective.</p>	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Option 1 This option will result in the delivery of housing, which will have positive impacts on reducing housing based deprivation and overall deprivation, with the Housing domain making up approximately 9% of the weighting for the overall deprivation (Index of Multiple Deprivation). Whether the delivery of housing will have positive impacts on existing deprived communities is considered to be unknown and will depend largely on whether new housing benefits existing communities. New job opportunities will be created, which again may benefit existing deprived communities, but again will depend on take-up. This option also protects and maintains existing employment opportunities, which impacts positively upon this objective, However, this option results in a 7.5% loss of open space situated on the urban fringe. Access to open space has been linked to reducing health inequalities, with access to open space benefiting all communities but benefitting deprived communities the most (Natural England 2012). It is these communities where long term health conditions such as obesity,</p>	-/+?	--

SA Objective	Summary of effects	Option 1	Option 2
	<p>heart disease and diabetes are more prevalent, particularly in those that have no or limited access to green open space. In some cases, these urban fringe sites are adjacent to some of the city's most deprived communities and in these cases loss of this open space could result in a widening of health inequalities. The impacts are therefore considered to be mixed and uncertain.</p> <p>Option 2 This option will result in delivery of the OAN for housing, which will have positive implications for reducing housing based deprivation. However, more significantly will result in the loss of permanent job opportunities. The Income and Employment domains (IMD) make up a significant proportion of the IMD: 45% in total. Therefore the loss of 39% of available employment land and associated employment opportunities is considered to have a greater adverse impact on this objective than the positive gains related to new housing and is likely to increase employment-based deprivation. As described under Option 1, the impacts of loss on the urban fringe may result in a widening of existing health inequalities. In addition to this, loss of an additional 108ha of open space within the built up area is also likely to exacerbate and increase existing health inequalities between neighbourhoods. Overall, the impacts are considered to be adverse.</p>		
16) Engage local communities	<p>Option 1 This option includes loss of sites of open space within the urban fringe to housing. This will provide the opportunity to engage with local communities.</p> <p>Option 2 This option will include loss of sites of open space within the urban fringe and built up area, as well as loss of employment sites. This will involve more significant opportunities for engagement with the local community.</p>	+	++
17) Make the best of previously developed land	<p>Option 1 and Option 2 Both options will involve development on sites of PDL and should result largely in positive impacts. Loss of open space on the urban fringe does not imply that the best use of land within the built up area has not been achieved.</p> <p>Option 2. As Option 1. However, in addition, it is uncertain whether losing employment sites to housing is making the best of this land when considering the likelihood of significant adverse impact and considering the assessed need for additional employment land in the city.</p>	+	+?
18) Sustainable energy	<p>Options 1 and 2. Delivery of housing will increase energy consumption, due to an increased population with a greater consumption associated with Option 2. Additional energy is also associated with option 2 through the potential for increased transport related carbon emissions. Development on Greenfield sites are no longer required to achieve higher environmental standards (see CP8) and therefore no assumption can be made that houses in these locations either on the urban fringe or open space within the built up area would be more sustainable than those on PDL.</p>	-	--
19) Taking account of the changing climate	<p>Option 1 This option involves the loss of Greenfield sites on the urban fringe. Open space will play an increasingly important role in adaptation to climate change, with open space helping to absorb water, therefore reducing flood risk but also maintaining water supply, and also help to maintain urban temperatures and have been documented to reduce urban temperatures by 1-2 degrees Celsius.</p> <p>Option 2</p>	-	--

SA Objective	Summary of effects	Option 1	Option 2
	The impacts of development on urban fringe as described under Option 1. In addition, this option will involve the loss of 108 ha of open space within the built up area, which also provides these important environmental functions. This option is considered to have a more significant adverse impact on this objective.		
20) Meet BREEAM / Code for Sustainable Homes	There is no direct impact on this objective. Housing development on Greenfield sites are no longer required to meet higher standards than housing on PDL. (see CP8)	0	0
21) Increasing accessibility	<p>Option 1 Development within the built up area will have good access to existing employment opportunities, as well as other services and facilities. Loss of open space within the urban fringe however will reduce access to open space. In addition, housing located within the urban fringe may have limited access to services.</p> <p>Option 2 As above, development within the built up area will have good access to services such as healthcare and food provision. However, this option will result in significantly reduced access to B-use class employment opportunities throughout the city (going against the recommendations of the Employment Land Study), and it is unknown how the increased infrastructure requirements, e.g. healthcare and education to meet the needs of the increased population would be met locally. In addition to the impacts relating to loss of urban fringe sites under Option 1, this option will also result in loss of open space within the built up area, not only reducing provision but also reducing access to provision. This goes against the standards set by the Open Space Study.</p>	-/+	--
22) Reduction of waste	<p>Options 1 and 2 Both options will result in an increase of waste generated, with a larger amount of waste generated with the higher target option.</p> <p>In addition, with option 2, the loss of safeguarded industrial estates to housing, which have potential to accommodate waste uses, may inhibit develop of some waste uses that were considered suitable for industrial estates and reduce the city's ability to move waste up the hierarchy or lead to greater adverse impacts associated with transportation of waste.</p>	-	--

Appendix D Screening Proposed Modifications

Amendments shown in ~~strikethrough~~ for additions or underlined for deletions.

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
PM001	<p>Introduction & Overview, p. 4</p> <p>Paragraph 1.1, Footnote 1, paragraph 1.4</p>	<p>1.1 The City Plan is the first Development Plan Document (DPD)¹ to be produced as part of a wider set of local planning policy documents known as the Brighton & Hove's Local Development Framework. Its <u>The purpose of the City Plan</u> is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives. <u>The City Plan Part One is a Development Plan Document (DPD)¹.</u></p> <p>Amend footnote 1:</p> <p>¹ Development Plan Document (DPDs) are the key statutory documents within Local Development Framework's and will <u>which</u> set out the vision, strategy and policies for the area. They are subject to Sustainability Appraisal and to a formal examination in public. The City Plan Part 1 is Brighton & Hove's Core Strategy.</p> <p>...</p> <p>Other Local Development Plan Framework Documents</p> <p>1.4 The policies in all the other Development Plan Documents for forming the Brighton & Hove LDF have to be in line with the City Plan Part 1, so it is the most important <u>Development Plan Document.</u> part of the LDF.</p>	<p>No impact on the SA. Modification within the Introduction section and editorial in nature.</p>
PM002	<p>Introduction and Overview, p. 5</p>	<ul style="list-style-type: none"> Waste and Minerals <u>Local</u> Plan – the council, working in partnership with East Sussex County Council and the South Downs National Park Authority, is preparing a Waste and Minerals <u>Local</u> Plan² that will provide planning policies to guide the management of waste and production of minerals in the plan area until 2026. 	<p>No impact on the SA. Modification within the Introduction section and editorial in nature.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications														
	Paragraph 1.4 and Footnote 2	Amend Footnote 2: ² Waste and Minerals Core Strategy is anticipated to be adopted March 2013. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan was adopted 19 February 2013 and work has commenced on a waste and minerals sites plan.															
PM003	Introduction and Overview, p. 5 Paragraph 1.4	<ul style="list-style-type: none"> The South Downs National Park was formally designated in April 2010 and the National Park Authority brought into effect in April 2011. This is now the planning authority for the administrative area of Brighton & Hove that falls within the National Park. This area will no longer be covered by the Brighton & Hove City Plan Part 1 policies but will be covered by the Core Strategy <u>Local Plan</u> for the National Park. 	No impact on the SA. Modification within the Introduction section and editorial in nature.														
PM004	Introduction and Overview Paragraph 1.4 Table 1, Page 5	Delete table 1: Table 1 City Plan Part 1 Preparation Timetable <table border="1" data-bbox="409 887 1173 1347"> <thead> <tr> <th data-bbox="409 887 741 954">Stage</th> <th data-bbox="745 887 1173 954">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 954 741 1021">Reg 18: Options Consultation</td> <td data-bbox="745 954 1173 1021">October-November 2011</td> </tr> <tr> <td data-bbox="409 1021 741 1088">Reg 18: Draft City Plan Consultation</td> <td data-bbox="745 1021 1173 1088">May - July 2012</td> </tr> <tr> <td data-bbox="409 1088 741 1155">Publication of the Document</td> <td data-bbox="745 1088 1173 1155">February – April 2013</td> </tr> <tr> <td data-bbox="409 1155 741 1222">Date for submission to Secretary of State</td> <td data-bbox="745 1155 1173 1222">May 2013</td> </tr> <tr> <td data-bbox="409 1222 741 1289">Pre-examination meeting with Inspector</td> <td data-bbox="745 1222 1173 1289">July 2013</td> </tr> <tr> <td data-bbox="409 1289 741 1347">Examination in Public</td> <td data-bbox="745 1289 1173 1347">September 2013</td> </tr> </tbody> </table>	Stage	Date	Reg 18: Options Consultation	October-November 2011	Reg 18: Draft City Plan Consultation	May - July 2012	Publication of the Document	February – April 2013	Date for submission to Secretary of State	May 2013	Pre-examination meeting with Inspector	July 2013	Examination in Public	September 2013	No impact on the SA. Modification within the Introduction section and editorial in nature.
Stage	Date																
Reg 18: Options Consultation	October-November 2011																
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Ref	Policy/ Paragrap h	Proposed Modification		Summary of Sustainability Implications
		Estimated date for adoption by the council	February 2014	
PM005	Introducti on and Overview Paragrap h 1.6, page 5	Delete paragraph 1.6: 1.6 The Localism Act sets out the government's intention to revoke regional spatial strategies. It is acknowledged that any move to revoke existing regional strategies is subject to the outcome of the consultation on the related environmental assessment (SEA of Revocation of the South East Regional Strategy Environment Report) which was published 11 October 2012. The South East Plan remains part of the list of documents which local authorities must have regard to when preparing their development plans until the government orders revoking the existing Regional Plans are published and take effect. Therefore although it is considered that the draft City Plan remains in conformity with the South East Plan, it is not referred to explicitly within the City Plan.		No impact on the SA. Modification within the Introduction section and editorial in nature.
PM006	Introducti on and Overview	Figure 1 – need to change the reference to Minerals & Waste Core Strategy		No impact on SA.
PM007	Introducti on and Overview Paragrap h 1.7, Page 6	Brighton & Hove provides jobs, entertainment, shops and leisure, health and education facilities for people living in neighbouring areas. The city is a regionally significant <u>retail and visitor economy</u> destination and a transport hub		No impact on the SA. Modification within the Introduction section and editorial in nature.
PM008	Footnote 4, Page 7	Footnote 4: Brighton & Hove City Plan Part 1 Duty to Cooperate <u>Compliance</u> Statement December 2012 <u>June 2013</u>		No impact on the SA. Modification within the Introduction section and editorial in nature.
PM009	Challeng es,	<ul style="list-style-type: none"> Transport is the main cause of poor air and noise quality in certain parts of the city. In 2008<u>2013</u> an extended a new Air Quality Management Area was designated that is a 		No impact on the SA. Modification within the

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	paragrap h 1.24, page 13	<p>quarter of the size of the previous one covering a significant area of the centre of the city²⁵.</p> <p>²⁵ The council declared a new air quality management area on 30 August 2013. The Air Quality Management Area and Action Plan will be updated in 2013/4.</p>	Introduction section and editorial in nature.
PM010	Section 2 – The Strategy, Spatial Strategy, p. 24, 28, 29,	<p>A Spatial Strategy for Brighton & Hove</p> <p>2.7 <u>Recognising the need to plan positively to meet the needs of a growing city,</u> the City Plan's aim is to <u>seeks to achieve</u> a balanced and sustainable approach to accommodating growth over the plan period.</p> <p>...</p> <p>Strategy for the future of Brighton & Hove</p> <p>2.12 The assessed housing requirements (demand and need for new homes) for the city over the plan period are much higher than the city can realistically accommodate. The plan sets a minimum housing target of 44,300 <u>13,200</u> new homes to be achieved by 2030 and this reflects the capacity and availability of land/sites in the city; the need to provide for a mix of homes to support the growth and maintenance of sustainable communities; the need to provide land for other essential uses (such as employment, retail, health and education facilities and other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.</p> <p>...</p> <p>The Spatial Distribution of Development</p> <p>2.19 Spatially the majority of new housing, employment and retail development <u>will be located on brownfield (previously developed) sites within the city's built up area and will be directed to eight specific development areas (DA1 – 8).</u> These are areas of the city which</p>	<p>The housing target has increased, which impacts positively against objective 5 (housing). The urban fringe has been identified as a broad source of potential for housing. This has potential for a range of adverse impacts, particularly on the environmental objectives.</p> <p>Revise SA accordingly</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications								
		<p>either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration will secure substantial benefits for the city. This approach ensures that <u>opportunities for development of brownfield sites are maximised</u>, transport impacts will be minimised and the city's countryside and the South Downs National Park will continue to be protected.</p> <p><u>2.20 Much of the land within the city's defined urban fringe forms part of the city's green infrastructure; either in terms of the city's open space framework (e.g. parks, recreation grounds, sports pitches and playing fields, allotments, cemeteries, natural/semi-natural space) or part of the city's biodiversity resource such as local nature reserves, sites of conservation importance or Nature Improvement Areas. However in light of the significant scale of the city's housing need, objectively assessed to fall within a range of 18,000 - 24,000 new homes to 2030*</u>; the requirement of the government's National Planning Policy Framework to plan positively to meet housing needs in full and; the need to adequately address the social dimension of sustainable development the potential for housing from the urban fringe has had to be reassessed*. The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites but also includes the urban fringe as broad source of potential for housing development.</p> <p>Insert footnotes: * Coastal West Sussex Housing Study Update 2014 * Urban Fringe Assessment Study June 2014</p>									
PM011	Table 3	<p>Table 3 Summary of Development Proposals</p> <table border="1" data-bbox="409 1206 1391 1428"> <thead> <tr> <th data-bbox="409 1206 654 1353"></th> <th data-bbox="654 1206 898 1353">New Homes</th> <th data-bbox="898 1206 1142 1353">New Employment Floorspace (sq m)</th> <th data-bbox="1142 1206 1391 1353">New Retail floorspace (sq m)</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 1353 654 1428">DA1 Brighton Centre and</td> <td data-bbox="654 1353 898 1428">20</td> <td data-bbox="898 1353 1142 1428"></td> <td data-bbox="1142 1353 1391 1428"><u>Minimum</u> 20,000</td> </tr> </tbody> </table>		New Homes	New Employment Floorspace (sq m)	New Retail floorspace (sq m)	DA1 Brighton Centre and	20		<u>Minimum</u> 20,000	Amendments to quantum of housing assessed in either DA policies of CP1.
	New Homes	New Employment Floorspace (sq m)	New Retail floorspace (sq m)								
DA1 Brighton Centre and	20		<u>Minimum</u> 20,000								

Ref	Policy/ Paragraph	Proposed Modification				Summary of Sustainability Implications
		Churchill Square			<u>comparison goods</u>	
		DA2 Brighton Marina	1940	2,000	5,000	
		DA3 Lewes Road	810 <u>875</u>	15,600		
		DA4 New England Quarter and London Road	1185 <u>1130</u>	20,000		
		DA5 Eastern Road and Edward Street	470 <u>515</u>	18,200 – 22,200 <u>23,200</u>		
		DA6 Hove Station	630 <u>525</u>	1,000		
		DA7 Toad's Hole Valley	700	25,000		
		DA8 Shoreham Harbour	400 <u>300</u>	7,500		
		Rest of the City:	3945			
		a) <u>Within the built up area</u>	<u>4130</u>	11,257 ³⁵		
		b) <u>Within the urban fringe</u>	<u>1060</u>			
		Small site development ³⁶	1250 <u>2015</u>			

Ref	Policy/ Paragraph	Proposed Modification				Summary of Sustainability Implications
		Total	41350 <u>13210</u>	100,500 to 105,500	25,000	
PM012	DA1 Brighton Centre & Churchill Square Area, page 34	<p>Amend introductory paragraph to the policy</p> <p>The strategy for the development area is to secure a new state of the art conference centre in a landmark new building to benefit the city and the region and to sustain the tourism and service economy for the next 30 years, positioning Brighton & Hove as one of Europe’s leading conference and meeting destinations. The redevelopment of the Brighton Centre will form part of a comprehensive scheme including the extension of the Churchill Square Shopping Centre and new leisure facilities.</p>				No impact on SA. Modification is editorial in nature.
PM013	DA1 Brighton Centre & Churchill Square Area, page 34	<p>A. 3. Support the extension of the Churchill Square shopping centre to provide a minimum 20,000 sq m <u>net</u> of new retail comparison goods³⁷ floorspace and A2/A3 use floorspace;</p>				This modification is not considered to have any significant impact on any of the SA objectives. Modification is for clarification purposes.

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
PM014	DA1 Brighton Centre and Churchill Square Area, page 34	<p>A. 5. To ensure high quality public and sustainable transport facilities serve new development, <u>in particular the need to improve the bus interchange facilities at Churchill Square</u>;</p> <p>A. 6. Improve pedestrian and cycle access through <u>and around</u> the area <u>particularly along Queens Road to Brighton Station</u> and reduce the severance between the northern side of the A259 and the seafront to accord with the Public Space Public Life Study;</p> <p>A. 7. Ensure improvements to local air quality <u>in at the West Street/ A259 Western Road, Churchill Square and North Street transport corridor and along Queens Road / West Street</u> ³⁸ <u>junction through the implementation of the council's Air Quality Action Plan. And ensure developments do not increase the number of people exposed to poor air quality. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.</u></p>	<p>A5 This modification provides further details to and builds upon an existing policy point and is not considered to change the previous findings. No impact on SA.</p> <p>A6 This modification provides further details to and builds upon an existing policy point and is not considered to change the previous findings. No impact on SA.</p> <p>A7 This modification provides more up to date details of roads that suffer from poor air quality within the Development Area and is considered to strengthen the policy by specifically requiring improvements or mitigation. However, these amendments are not considered to significantly change the previous SA findings which found the policy to have overall negative impacts on air quality. However, as the AQMA area has changed, it is recommended to update the SA to ensure it reflects the most up to date position.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
			Update SA accordingly.
PM015	DA1 Brighton Centre & Churchill Square Area, page 35 Part B and remove accompanying footnote 38	<p>B1. New Brighton Centre and expansion of Churchill Square.</p> <p>Redevelopment of the Brighton Centre Area³⁸ to provide a new 25,000 sqm conference centre, and expansion of Churchill Square shopping centre to provide a minimum of 20,000sqm <u>net</u> new comparison goods A1 floorspace (and A2 and A3 use classes). New hotel and leisure facilities including a cinema will also be permitted. Proposals will be assessed against the local priorities set out above, citywide policies, informed by the adopted Brighton Centre SPD and the following criteria:</p> <p>³⁸As defined in the Brighton Centre SPD01 a core 'block' has been identified (comprising a number of smaller blocks) bounded by Western Road, West Street, Queensbury Mews and Cannon Place. Further detail is set out in the adopted SPD</p>	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
PM016	DA1 Brighton Centre & Churchill Square Area , page 36 Remove para 3.4 and renumber subseque nt paragrap hs to reflect change	3.4 The City Council will ensure that a strategy is devised so that the redevelopment of the Brighton Centre is adequately managed and does not result in a shortfall of music/conference venue space should Black Rock not be available.	No impact on SA.
PM017	DA1 Brighton Centre and Churchill Square Area, paragrap h 3.5, page 36	<p>3.6 Proposals should promote strong linkages with the primary shopping frontages, along Western Road in particular and connectivity through to the seafront to address the problem of pedestrian severance. Improvements should include an enhanced <u>bus interchange and pedestrian environment around Churchill Square, a new gateway link through from Churchill Square Shopping Centre to the seafront, and an improved junctions at West Street and Kings Road and at the Clock Tower (Western Road, North Street, and Queens Road)</u>. On completion of the redevelopment the primary retail frontage of the regional centre will be extended to include any new retail elements of the scheme.⁴¹</p> <p>3.7 Previous <u>Current</u> air quality assessments⁴² have indicated that the <u>West Street/ A259 junction Western Road, Churchill Square and North Street transport corridor and Queens Road exceeds the Government's Air Quality Objective for Nitrogen Dioxide and the area is now included within the declared Air Quality Management Area (AQMA)⁴³</u>. Improvements to local air quality <u>in at the West Street/ A259 these corridors junction will be are</u> a priority</p>	<p>This modification strengthens the requirements relating to improvements of sustainable transport infrastructure, and also requires improvements at a greater number of junctions/roads. However the modification is not considered to significantly change the previous SA findings.</p> <p>The majority of these modifications are editorial in nature. The new paragraph strengthens the policy by</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>for the area. The movement of freight within the city centre <u>can be</u> is a significant contributor to <u>airborne pollution</u> <u>quality levels</u>. The potential to reduce, retime, reroute and/or revise <u>the mode of transport</u> will be assessed in order to look at measures to reduce the number of freight trips into the city centre <u>AQMA</u>. Measures will be developed that encourage <u>sustainable lower emission</u> urban freight distribution (see policy CP9 Sustainable Transport). <u>New development proposals should take account of their impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.</u></p> <p>⁴²The 2007¹¹ Detailed Air Quality Assessment and subsequent updates ⁴³2008¹³ Air Quality Management Area</p>	<p>requiring improvements or mitigation, however is not considered to change the previous SA findings.</p>
PM018	DA2 Brighton Marina, Gas Works and Black Rock Area p. 38, 39	<p>Amend illustrative diagram to remove from key and map 'shopping area'. Amend policies map to reflect this.</p> <p>3.13 The long term aspiration of the council is to address the deficiencies of the Marina, including the underperforming District Shopping Centre, and the wider area to facilitate the creation of a mixed use <u>district area</u> of the city. This will be achieved through the generation of a sustainable high quality marina environment which creates easier and more attractive access for residents and visitors, extends the promenade environment up to and around the Marina and creates stronger pedestrian and visual links with the sea from the Marina.</p> <p>Amend policy:</p> <p>DA2 Brighton Marina, Gas Works and Black Rock Area</p> <p>The strategy for the development area is to facilitate the creation of Brighton Marina and the wider area as a sustainable mixed use <u>district area</u> of the city, through the generation of a high quality marina environment...</p>	<p>The removal of the District Centre could have some minor adverse impacts. It will mean that the sequential test for out of town shopping proposals would no longer take into consideration the Marina as a town centre location risking out of town retail developments in the east of the city. An impact assessment for larger proposals would also not be required to look at the impact of the proposal on the Marina. This may impact on the employment (11) and economic development (12) objectives. It may also result</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
			<p>in an inappropriate mix of A1 and non A1 uses being delivered that do not meet the needs of the increasing local population impacting on accessibility (21). However the policy specifically states that a new policy setting out the appropriate mix of retail uses will be included within Part 2 of the City Plan, and this is considered to mitigate against the potential minor adverse impacts in terms of accessibility, and when set in the context of the policy, the impacts of this change on employment and economic development are considered to be negligible, as the policy should still result in strong positive impacts for these objectives due to the amount of housing, retail, employment and leisure uses delivered.</p> <p>Therefore this modification is not considered to change the findings of the previous SA.</p>
PM019	DA2 Brighton Marina,	<p>... by supporting proposals which:</p> <ul style="list-style-type: none"> • Secure a high quality of building design <u>that takes account of the cliff height</u> 	<p>The removal of the cliff height restriction significantly changes the findings of the</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	Gas Works and Black Rock Area p. 39, p. 44/5/6	<p>issues in the Marina, townscape and public realm while recognising the potential for higher density mixed development in accordance with the aims of the Spatial Strategy to optimise development on brownfield sites;</p> <ul style="list-style-type: none"> Do not breach the cliff height within the Marina; <p>...</p> <p>Add New Paragraph afterR supporting text after 3.15:</p> <p><u>Fundamental to the strategy for the development area is the provision of mixed use development at a density that helps achieve a vibrant and sustainable place. However, proposed developments should ensure the preservation and/or enhancement of the setting of all listed buildings and conservation areas nearby, as well as the wider historic landscape and city skyline including views to and from the South Downs National Park. Applications for higher density development will be assessed in terms of their ability to meet the design and density considerations set out in CP12 and CP14. It is essential that any new development provides an attractive pedestrian environment, active retail and leisure frontages as well as easy access to the harbour, boardwalk, shoreline and other recreational areas within the Marina.</u></p>	<p>previous SA assessment against a range of objectives. It is considered to make the impact against the objective 3 (maintaining local distinctiveness) and 4 (protecting the SDNP) more uncertain.</p> <p>Update SA accordingly.</p> <p>NB: Additional paragraph to supporting text included as per SA recommendation.</p>
PM020	DA2 Brighton Marina, Gas Works and Black Rock Area p. 39	<ul style="list-style-type: none"> Contribute towards the production of or provide Encourage opportunities for the sustainable production of heat and power for the district; 	<p>The wording resulting from this modification is less strong than the previous iteration, however is not considered to alter the impact of the previous SA score or findings against SA objective 18 (maximise sustainable energy).</p>
PM021	DA2 Brighton	<ul style="list-style-type: none"> Secure a more balanced mix of retail, including support for independent retailers, and non retail uses such as leisure, tourism, and commercial uses 	<p>The removal of the District Centre could have some</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
	Marina, Gas Works and Black Rock Area p. 39, 40	<p>and non retail uses, which accords with its District Centre status;</p> <p>...</p> <p>A. 6. Balancing uses with an emphasis towards boating, surfing, leisure and recreation and the enhancement of the District Centre <u>retail offer</u> through encouraging the provision of mixed retail activity and services to support any additional expansion in population (see CP4).</p> <p>3.17 The Marina is identified as a District Centre in the city's retail hierarchy (see Policy CP4). The majority of <u>existing</u> retail activity takes place in the Merchant's Quay and at the Asda superstore. Whilst the District Centre Brighton Marina contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role, it <u>currently</u> lacks the full range of shops and services, such as banks and post offices, found typically in District Shopping Centres to support the proposed expansion in residential population. The strategy for the development area is to enhance the choice and performance of retail activity in the District Centre Marina through the encouragement of mixed retail activity and improvements to the public realm. Ancillary retail development on the Black Rock and Gas Works sites <u>should accord with CP4 Retail Provision, not compete with or prejudice the District Centre at the Marina. A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.</u></p>	<p>minor adverse impacts. It will mean that the sequential test for out of town shopping proposals would no longer take into consideration the Marina as a town centre location risking out of town retail developments in the east of the city. An impact assessment for larger proposals would also not be required to look at the impact of the proposal on the Marina. This may impact on the employment (11) and economic development (12) objectives. It may also result in an inappropriate mix of A1 and non A1 uses being delivered that do not meet the needs of the increasing local population impacting on accessibility (21). However the policy specifically states that a new policy setting out the appropriate mix of retail uses will be included within Part 2 of the City Plan, and this is considered to mitigate against the potential minor adverse impacts in terms of accessibility, and when set in</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
			<p>the context of the policy, the impacts of this change on employment and economic development are considered to be negligible, as the policy should still result in strong positive impacts for these objectives due to the amount of housing, retail, employment and leisure uses delivered.</p> <p>Therefore this modification is not considered to change the findings of the previous SA.</p>
PM022	DA2 Brighton Marina, Gas Works and Black Rock Area p. 40	<p>A. 12. Maximising opportunities to support the city’s sustainability objectives through large-scale zero and low-carbon energy technologies to serve the Marina and wider city, particularly those that take advantage of the Marina’s coastal location (see CP8) <u>subject to delivery and viability considerations.</u></p>	<p>The modification may result in sustainable energy infrastructure not being delivered on viability grounds. This makes the impact to be more uncertain against objective 18 (maximise sustainable energy) and is a change from the previous position.</p> <p>Revise SA accordingly.</p>
PM023	DA2 Brighton Marina, Gas Works and Black	<p>B. Provision will be made for the following amounts of additional development to be provided by 2030:</p> <p><u>1,940 1,938</u> residential units (including the 853 residential units already granted planning permission for the outer harbour, <u>1000 residential units allocated for the inner harbour and 85 residential units allocated for the Gas Works site);</u></p>	<p>No impact on SA Objectives. Modification for clarification purposes only.</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	Rock Area p. 41	<p>5,000 sq m <u>(net)</u> retail (A1-A5) floorspace;</p> <p>...</p> <p>C. 1. Brighton Marina Inner Harbour</p> <p>Provision is made for a mixed use development comprising a minimum of 1,000 <u>additional</u> residential units (<u>excluding the outer harbour scheme</u>), 5,000 sq m of <u>net additional</u> retail development (A1-A5), 3,500 sq m of <u>additional</u> leisure and recreation use, community facilities (including health facility and community centre).</p> <p>C.3 Black Rock Site</p> <p>a) Provision of a high quality leisure and recreation facility that caters for the needs of the city, <u>complements Brighton Marina</u>, enhances the seafront leisure function, draws tourism to the city and attracts visitors and residents to the seafront;</p> <p>...</p> <p>Proposals for uses in addition to the recreation and leisure use will only be considered where it can be demonstrated that these uses support the delivery of a leisure and recreation facility and are not in competition with the District Centre status of <u>complement development at</u> the Marina. Supporting or enabling uses should perpetuate informal leisure uses associated with the seafront, conserve the historic environment and enhance linkages between Black Rock, the Marina and the Gas Works site.</p>	
PM024	DA2 Brighton	Amend footnote 47:	No impacts on SA. Modification for clarification

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	Marina, Gas Works and Black Rock Area p. 41	⁴⁷ Brighton and Hove GPs have worked together to establish an emerging clinical commissioning group which covers the city, from Saltdean in the east to Portslade in the west. The clinical commissioning group will become <u>became</u> a statutory organisation in April 2013 when the PCT ceased <u>to exist</u> . Until that date it is working as a formal sub-committee of the NHS Sussex Board. Some PCT functions will be <u>have</u> passed to clinical commissioning groups, some to the new NHS Commissioning Board, and the responsibility for public health is transferring <u>has transferred</u> to local authorities.	only.
PM025	DA3	<p>DA3.A.2. Promoting and investing in improved bus, cycling and pedestrian routes along Lewes Road from The Level to the Universities in partnership with public transport operators in order to achieve a modal shift and thereby help reduce the impact of traffic, <u>in particular on air and noise quality</u>, and ensure that new development does not negatively impact on the air quality of the area</p> <p>...</p> <p>DA3.A.7. To ensure improvements to local air quality through implementation of the council's Air Quality Action Plan and ensure new developments do not increase the number of people exposed to poor air quality or traffic noise. <u>Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.</u></p> <p>Add to end of paragraph 3.31:</p> <p><u>New development proposals should take account of their impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.</u></p> <p>Amend footnote 52:</p> <p>⁵²...The area of Lewes Road south of the Vogue Gyrotory from the University of Brighton to the Level is</p>	<p>These modifications are considered to strengthen the policy by specifically requiring development to take account of their impact on local air quality and provide improvements or mitigation. However, these modifications are not considered to significantly change the previous SA findings which found the policy to have overall negative impacts on air quality. However, as the AQMA area has changed, it is recommended to update the SA to ensure it reflects the most up to date position.</p> <p>Update SA accordingly.</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		included in the 2008 ¹³ Air Quality Management Area as it exceeds the government's Air Quality Objective for annual Nitrogen Dioxides. This will be addressed through the implementation of the council's Air Quality Action Plan.	
PM026	DA3	<p>B. Provision will be made for the following amounts of additional development to be provided by 2030. Provision will be made through strategic site allocations (below) and through allocations made in the City Plan Part 2 for:</p> <p>840 <u>875</u> residential units;</p>	<p>This modification provides for 65 additional residential units within the Development Area. This is approximately 8% increase over the previous amount. This is not considered to significantly change any of the impacts, however it is recommended to change the SA to ensure it reflects the most up to date numbers.</p>
PM027	DA3	<p>C. Strategic Allocations in the Lewes Road Development Area are:</p> <p>1. Preston Barracks and Brighton University (Mithras House and Watts/Cockcroft Site)</p> <p>The city council will work with the University of Brighton and other partners to provide a mixed use employment-led development comprising a new business school, 10,600sqm B1 employment floorspace, including an Innovation Centre; 750 rooms of student accommodation; 300 residential units and other ancillary supporting uses. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies, <u>guidance in the adopted Planning Brief for the site</u> and the following criteria:</p> <p>...</p> <p>c) The development should aim to be zero carbon and through creative landscaping solutions (including features such as green walls) should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping</p>	<p>C1: No impact on SA.</p> <p>C1c: The removal of the ambition to provide a zero carbon development weakens the assessment against SA objective 18 (sustainable energy). However, this change itself is not considered to change the previous score from a +, to a score of either no impact or a negative impact, due to the other policy requirements, particularly relating to consideration of</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>enhancements <u>through creative landscaping solutions</u>.</p>	<p>decentralised energy networks. However, as the assessment of DA3 is being reviewed to reflect the revised quantum of development, then this provides the opportunity to remove references to zero carbon developments as appropriate, to ensure consistency between the SA and the final policy.</p> <p>Update SA accordingly</p> <p>The other amendment relates to a re-ordering of text and is considered to be editorial in nature.</p>
PM028	DA3	<p>DA3. C. 2. Woollards Field South Provision of 5,000 sq m of B1 office <u>business</u> space or alternative employment generating development that helps to meet the city’s infrastructure needs on land to the south of the new archive centre, known as The Keep.</p> <p>...</p> <p>Amend and add footnote to DA3.C.2.c</p> <p>c) As a greenfield site, the development will be expected to be zero carbon⁵⁰ and to achieve an Outstanding BREEAM rating and, through creative landscaping solutions (including features such as green walls), should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping</p>	<p>DA3 C 2 No impact on SA. DA3 c2c</p> <p>This modification means that there is no reference to achieving BREEAM ratings within the policy and weakens the score against the SA objective 20 (meet BREEAM standards) and is considered to reduce the score from significantly positive. To be consistent with other policy assessments, where there is</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p style="text-align: center;">enhancements.</p> <p>⁵⁰ This will be subject to viability considerations and potential mitigation measures, as set out in policy CP8.</p>	<p>no reference to meeting BREEAM, a negative impact is awarded.</p> <p>Revise SA accordingly.</p>
PM029	DA3	<p>And add new criterion:</p> <p><u>g) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u></p>	<p>(g): These amendments strengthen the positive impact against SA objective 7 (minimise risk of water pollution), however SA score still considered to be “mixed” due to increased risk of surface water flooding across the development area. No change from previous SA position.</p>
PM030	DA3	<p>DA3. C. 3. Falmer Released Land, Former Falmer High School</p> <p>Redevelopment for <u>some or all of</u> a range of uses including housing, purpose built student accommodation, offices (B1), <u>and/or</u> educational use., <u>Redevelopment should include</u> a car park related to the American Express Community Stadium and the provision, on or off site, of permanent accommodation for the Bridge Community Education Centre and for Brighton Aldridge Community Academy’s Pupil Referral Unit. Proposals will be assessed against the priorities for DA3 Lewes Road, citywide policies and the following criteria:</p> <p>a) The development will be required to achieve a high standard of design.</p> <p>b) Sustainable transport infrastructure will be required to support the scheme and to ensure that there is no adverse air quality impact.</p>	<p>3. These modifications are not considered to impact on the SA and are considered to be for information and clarification purposes.</p> <p>3d. The removal of the ambition to provide a zero carbon development weakens the assessment against SA objective 18 (sustainable energy). However, this change itself is not considered to change the previous score from</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>c) Development should ensure that there will be no adverse impacts on the setting of the South Downs National Park or any locally or nationally designated landscape, historic or ecological sites.</p> <p>d) The development should aim to be zero carbon and through creative landscaping solutions (including features such as green walls) should contribute towards Biodiversity Action Plan objectives, green infrastructure and wider landscaping enhancements through creative landscaping solutions.</p> <p>e) The developer will be required to enter into a training place agreement to secure training for local people.</p> <p>f) <u>f) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u></p>	<p>a +, to a score of either no impact or a negative impact, due to the other policy requirements, particularly relating to consideration of decentralised energy networks.</p> <p>f: These amendments strengthen the positive impact against SA objective 7 (minimise risk of water pollution), however SA score still considered to be “mixed” due to increased risk of surface water flooding across the development area. No change from previous SA position.</p>
PM031	DA3	<p>Change last sentence of paragraph 3.36:</p> <p>A planning brief for Lewes Road (Preston Barracks and University of Brighton) was adopted in September 2011, <u>provides detailed guidance on the site.</u></p>	No impact on SA.
PM032	DA3	<p>3.37 Planning permission was granted in 2011 for an archive centre with related conference, education and research facilities on the Woollards Field site to the south of Falmer Station. The remainder of the site to the south is allocated for <u>5,000 square metres of office business (B1) floorspace or other employment generating uses in connection with meeting the city’s infrastructure needs totalling 5,000 square metres. The site is earmarked in the Infrastructure Delivery Plan (Annex 2) as providing important infrastructure to meet the city’s requirement for ambulance/paramedic rapid response points.</u> This development will help provide local training and employment opportunities and could help to strengthen the</p>	No impact on SA. For clarification / information purposes.

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		Universities' positive role within the local economy. Land at the southern end of the former Falmer High School site is no longer required for educational purposes. The site has potential for redevelopment for a range of uses, including student accommodation, residential, office and educational use. These uses could work in conjunction with car parking use for the nearby American Express Community Stadium. Permanent accommodation for the Bridge Community Education Centre and for Brighton Aldridge Community Academy's Pupil Referral Unit should also be provided, either on the Falmer Released Land or in an acceptable alternative location.	
PM033	DA4 New England Quarter and London Road Area, page 57, 63	<p>6. Ensure improvements to local air <u>and noise quality</u>, through improvements to bus, pedestrian and cycle routes to achieve a modal shift and help reduce the impact of traffic, <u>and through the implementation of the council's Air Quality Action Plan and ensure developments do not increase the number of people exposed to poor air quality or traffic noise. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible.</u></p> <p>3.52 London Road, south <u>either side</u> of Preston Circus has been designated as part of the 200813 declared Air Quality Management Area due to exceeding the government's Air Quality Objective for Nitrogen Dioxides. and <u>The council's new Air Quality Action Plan 2014 will sets out measures to ensure improvement to air quality. New development proposals should take into account impact on local air quality, be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible.</u> The massing of residential developments adjacent to particular roads in the area should be carefully designed so as not to increase the number of people exposed to poor air quality.</p>	<p>These modifications are considered to strengthen the policy by specifically requiring development to take account of their impact on local air quality and provide improvements or mitigation. However, these modifications are not considered to significantly change the previous SA findings which found the policy to have overall negative impacts on air quality. However, as the AQMA area has changed, it is recommended to update the SA to ensure it reflects the most up to date position.</p> <p>Update SA accordingly.</p>
PM034	DA4 New England	Amend DA4.B	This modification of a reduction of 55 units

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
	Quarter and London Road, page 58	<p>B. Provision will be made by 2030 for the following minimum amounts of development through strategic allocations (below) and through allocations in the City Plan Part 2:</p> <ul style="list-style-type: none"> • 1485 <u>1,130</u> residential units; ... 	<p>represents a 4% decrease in housing to be delivered throughout the development area. This is not considered to significantly impact on any of the SA Objectives. However, to ensure that the final SA reflects the final policies, particularly with regards to quantum of development, it is recommended to update the assessment of DA4</p> <p>Update SA</p>
PM035	DA4 New England Quarter and London Road Area, Page 58	<p>Amend DA4.C. ii</p> <p>ii. An appropriate mix of uses including residential (C3) and <u>ground floor</u> ancillary retail (A1) and restaurants and cafes (A3) at ground floor will be permitted;</p>	<p>No impact on SA. Modification is editorial in nature.</p>
PM036	DA5 Eastern Road and Edward Street Area, page 65	<p>8. Ensuring that there is satisfactory provision of water and wastewater infrastructure to serve new development. Development will need to provide connection to off-site water distribution and sewerage systems at the nearest point of adequate capacity.</p>	<p>No impact on SA</p>
PM037	DA5, Part A, page	<p>Add paragraph 11 to Part A of policy:</p>	<p>This modification will have positive implications for</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	65 and add sentence to supportin g text 3.60 p. 70	<p><u>11. Support improvement to higher education teaching and library space in the Eastern Road and Edward Street Area.</u></p> <p>Insert at end of paragraph 3.60:</p> <p><u>Expansion and provision of additional teaching and library space for the universities, particularly the University of Brighton, at Circus Street and within the wider development area will be supported as an alternative use where other policy requirements are met (see paragraph 4.40 of CP3 Employment Land).</u></p>	objective 11 (employment), as will provide employment opportunities, however is not considered to alter the previous SA score or findings.
PM038	DA5 Eastern Road and Edward Street, page 66	<p>Amend DA5.B</p> <p>B. The minimum amounts of development to be secured by 2030 through strategic allocations (below) and through allocations in the City Plan Part 2 are: 470 <u>515</u> residential units; ...</p>	<p>This modification of an increase in 45 units represents a 9% increase in housing to be delivered throughout the Development Area. This is not considered to significantly impact on any of the SA objectives. However, to ensure that the final SA reflects the final policies, particularly with regards to quantum of development, it is recommended to update the assessment of DA5.</p> <p>Update SA</p>
PM039	DA5 Eastern Road and Edward Street Area,	<p>Amend DA5.C.1</p> <p>1. Royal Sussex County Hospital</p> <p>Comprehensive redevelopment and enlargement of the hospital to provide 74,000sqm additional hospital (D1 <u>C2</u> use) floorspace ...</p>	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	page 66		
PM040	DA5 Eastern Road and Edward Street Quarter, C2, page 66	<p>Amend introductory paragraph to C2 Edward Street Quarter:</p> <p>Employment-led redevelopment of the Edward Street Quarter (including former Amex House and the Job Centre) comprising demolition of the former Amex House and replacement with 15,000-20,000 sq m of high quality B1a office floorspace, a <u>minimum of 65 residential units</u> and ancillary shops (A1) and cafes and restaurants (A3). The proposal will be considered in the context of citywide policies and the following criteria:</p>	<p>This modification is not considered to cause any significant changes to the findings of the previous SA assessment. The SA notes that the other strategic allocations already expressed their individual housing targets as a minimum, and so this modification ensures consistency across the policy.</p>
PM041	DA5, C4, p 68 and supportin g text and paragrap h 3.65, p 71	<p>Amendment to DA5, allocation C4 and supporting text</p> <p>4. Freshfield Road Business Park and Gala Bingo Hall</p> <p>Long term opportunity for Mixed use redevelopment of the Freshfield Road Business Park and Gala Bingo Hall sites comprising a comprehensive approach to the site to improvement to the provision of employment floorspace including B1 office/light industrial floorspace and B8 warehousing and provision of a minimum of 110 residential units. The proposals will be considered against citywide policies and the following criteria:</p> <p>a) <u>A comprehensive approach to the redevelopment of both sites will be required to ensure that Provide modern employment space is provided alongside and residential development, and Re-provision or retention of that a community or leisure facility (to retain or replace the Bingo Hall) will be included as part of the Gala Bingo Hall site scheme appropriate to the needs of the local community.</u></p> <p>b) <u>The rRedevelopment across both parts of the site will be of a high standard of design, that is sympathetic to the surrounding historic built environment and</u></p>	<p>This modification clarifies that the residential element of this strategic allocation is likely to come forward in the short term, whereas the employment element is likely to come forward in the long term. The previous SA score against the objective 5 (housing) in the short term was “+”, and so this amendment is considered to increase this score to “++” and is therefore a change from the previous position. This amendment is not considered to alter the score against the employment and economic development</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>will make efficient use of the site in terms of height of buildings and layout and re-introduce development along the frontage of Eastern Road.</p> <p>c) The developer will enter into a training place agreement to secure training for local people.</p> <p>Supporting text changes: 3.65 The final strategic allocation for the area, Freshfield Road Business Park and the Gala Bingo Hall <u>and</u> car park, has been identified as a development opportunity. <u>The Freshfield Road Business Park element of the site is well occupied and only likely to come forward in the longer term (post 2024).</u> The buildings within the Business Park are currently largely in storage and trade counter uses. Due to the accessible location of the site, which is on a sustainable transport corridor, and its topography (it is at a lower level than the surrounding area) it is considered there are major opportunities to use the site more effectively however it is recognised these units serve a useful function for the city. It is expected that the majority of residential development will be delivered on the Gala Bingo Hall and Car Park site, <u>which can be delivered earlier in the plan period, with the a leisure or community use retained or re-provided as part of the redevelopment as part of a comprehensive scheme.</u></p>	<p>objectives (11 and 12) as the previous scores already reflect more delivery in the medium to longer term.</p> <p>Revise SA accordingly.</p>
PM042	DA5 Eastern Road and Edward Street, page 69	<p>3.59 Sustainable transport initiatives and improvements to the public realm⁶⁶ are a priority for the area, and will contribute to the aims of the Low Emissions Strategy (2011) to improve air quality in the area.</p> <p>⁶⁶ The Eastern Road Edward Street transport corridor has been identified in the 2007 Air Quality Detailed Assessment as exceeding the government's Air Quality Objective for nitrogen dioxide and is within the 2008¹³ Air Quality Management Area. Air Quality is a priority in the vicinity of the Royal Sussex Hospital.</p>	No impact on the SA. These amendments are considered to be editorial in nature.
PM043	DA6 Hove Station	<p>DA6. B. Provision will be made by 2030 for the following minimum amounts of development within this Development Area:</p> <ul style="list-style-type: none"> • 630 <u>525</u> residential units; ... 	This is a reduction locally, however is not perceived to have any impact. No impact on SA.
PM044	DA6 Hove	3.70 Growth that is based on utilising the sustainable transport connections, in particular Hove Railway Station is a priority in order to facilitate development within the area. <u>Part of</u>	These modifications are considered to strengthen the

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	Station Area, 76	<p>The Hove Station Area lies within the 2008-2013 declared Air Quality Management Area, within which dDevelopment proposals should pay particular regard to air quality, especially adjacent to the main transport roads and junctions such as the of Sackville Road and Old Shoreham Road junction. Developments must avoid increasing the number of people exposed to poor air quality and should not cause deterioration in air quality. New development proposals should take into account impact on local air quality be consistent with the council's Air Quality Action Plan and minimise increased exposure to existing poor air quality within the AQMA. Improvements and/ or mitigation will be sought wherever possible. Also several of the junctions in the area are at or near capacity so any additional traffic is likely to add to delays.</p>	<p>policy by specifically requiring development to take account of their impact on local air quality and provide improvements or mitigation. However, these modifications are not considered to significantly change the previous SA findings which found the policy to have overall negative impacts on air quality. However, as the AQMA area has changed, it is recommended to update the SA to ensure it reflects the most up to date position.</p> <p>Update SA accordingly.</p>
PM045	DA7 Toad's Hole Valley, policy and supportin g text amendm ents, pp 79-86	<p>DA7 – Toad's Hole Valley</p> <p>The strategy for the development of Toad's Hole Valley and Court Farm is to secure a modern, high quality and sustainable mixed use development to help meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods.</p> <p>A. The local priorities to achieve this strategy are:</p> <p>1. That the site is used efficiently and effectively to assist in meeting the development and infrastructure requirements of the city.</p> <p>2. Ensure that The development is of an <u>will aim to be an</u> exemplary standard in terms of environmental, social and economic sustainability, achievinges a One Planet approach and promotinges the city's UNESCO Biosphere objectives.</p>	<p>Point 2. This modification weakens the overall requirements of being an exemplary development, and will be picked up through specific modifications below.</p> <p>Point 3. This modification weakens the requirements to provide links to the SDNP and generates more uncertainty regarding their provision.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>3. Ensure that development respects the setting of the South Downs National Park and <u>seeks to</u> enhances links to the National Park for local residents and tourists.</p> <p>4. To secure <u>The</u> development that will benefit <u>provide the opportunity to benefit</u> residents in terms of the mix of uses, an improved provision of community facilities, road safety improvements, training and job opportunities for local people and the provision of green infrastructure including public open space and natural green space.</p> <p>5. To improve sustainable transport links to the area.</p> <p>6. To incorporate appropriate landscaping and planting to maximise opportunities to increase biodiversity across the site.</p> <p>7. Conserve and enhance the designated Site of Nature Conservation Importance.</p> <p>8. Protect sensitive groundwater source protection zones from pollution and ensure the reduction of <u>no increase in</u> surface water run-off and flood risk.</p> <p>9. Provide the necessary infrastructure for the development including water distribution and sewerage.</p> <p>B. Provision will be made for t<u>The following amounts and types of additional development</u> <u>key elements to will</u> be provided by 2030:</p> <ul style="list-style-type: none"> • A minimum of 700 residential units • A minimum 25,000sqm of B1 employment space <u>– site area 3.5 - 4.5 ha</u> • <u>Site reserved for a A new secondary school – site area 5ha</u> • Public open space with children’s play space and informal sports facilities – 2 ha hectares • Provision of ancillary supporting uses – shops and cafes <u>and multi-use community building</u> • Multi-use community facility • Food growing space – 0.5 ha hectares • Green infrastructure integrated through the site to deliver Biosphere objectives and contribute to Biodiversity Action Plan targets. • Energy infrastructure such as district cooling, heating and power networks 	<p>Point 4. No impact on SA.</p> <p>Point 8. Although a reduction in surface water run-off is a stronger requirement than the proposed wording, it is understood that the proposed wording is in line with what the SFRA recommends, ie. that runoff should be maintained at existing rates and is therefore considered acceptable and adequate and does not alter the previous SA score.</p> <p>Bullet 2: the removal of the requirement to provide 25,000sqm of employment floorspace and replacement with provision of a site for employment is less certain and is considered to change the scores against objective 11 and 12 from significantly positive to positive, and is a change from the previous position.</p> <p>Bullet 3: this modification removes the requirement for the developer to deliver a</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>C. The strategic allocation for Toad’s Hole Valley is:</p> <p>1. Toad’s Hole Valley east of the SNCI and south of the A27 embankment</p> <p>Provision will be made for a high standard sustainable, mixed-use development across the site comprising a minimum of 700 residential units, 25,000sqm B1 employment space, a new secondary school, a multi-use community facility and ancillary supporting uses.</p> <p><u>The following criteria will form the framework for detailed planning guidance and the basis for considering development proposals. The proposals will be assessed against the citywide policies and the following criteria:</u></p> <ul style="list-style-type: none"> a) New development will be expected to make the best use of the site and residential densities should fall within a range of 50 - 75 dwellings per hectare. b) There will be a minimum of 50 per cent 3+ bedroom family sized dwellings provided as part of the residential scheme. c) The office element of the scheme will be high tech, modern office space that will provide a range of unit sizes to attract new businesses to the city and support growing business. d) Due regard will be given to the impact of development on the purposes and setting of the South Downs National Park⁷⁹. e) Environmental sustainability will be central to the design and layout of the scheme which will be expected to meet <u>the requirements of policy CP8. Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon (or carbon neutral).</u> f) Development within this area will be expected <u>aim</u> to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability <u>and deliverability</u>. g) The scheme will make provision for 5ha of land to accommodate a new secondary 	<p>school. However a site for a school must still be provided. This is not considered to change the score against the health objective (13), as many other factors also make up this score, however the explanatory text should be updated to reflect the change.</p> <p>Bullet 5 and 6: no impact on SA findings.</p> <p>Bullet 9: This weakens the score against SA objective 18, and should be considered along with other modifications to the policy. See (e) and (f) below.</p> <p>Point e: This modification removes the specific requirements relating to sustainable building standards, and although the build is still required to meet the requirements of CP8, this is not considered to be as strong as the previous position. This will result in a change from the previous.</p> <p>Point f: This modification weakens the requirements to</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>school to be developed in partnership with by the city council or its nominee.</p> <p>h) Development will make <u>contributions towards</u> provision for improved pedestrian and cycle links to the South Downs National Park.</p> <p>i) The provision of a new multi-use community facility to include a community meeting place, a doctor's surgery and a resource promoting links to the National Park.</p> <p>j) Development proposals will address the issues of highways safety on King George VI Avenue, noise and other traffic impacts from the A27 and provide improved links to adjacent residential areas.</p> <p>k) Improvements to public transport access and a good quality public realm that encourages healthy lifestyles (walking and cycling with connections to existing cycle infrastructure).</p> <p>l) Development will need to provide local infrastructure to the water and sewer system at the nearest point of adequate capacity.</p> <p>m) Provision of children's play facilities, public open space (2 ha. minimum), <u>contributions towards</u> improved links to existing parks and food-growing space (0.5 ha.) and opportunities.</p> <p>n) Developer contributions will be sought to secure the sustainable conservation and enhancement of the adjacent Site of Nature Conservation Importance.</p> <p>o) The developer will enter into a training place agreement to secure training for local people.</p> <p>p) The site will be the subject of detailed guidance provided in a future planning brief <u>prepared in consultation with the landowners/developer and relevant stakeholders.</u></p> <p>q) Work in partnership with the Highways Agency and developer to improve the operational performance of the trunk road network and links to local roads that will be set out in a future planning brief for the area.</p> <p>Supporting Text</p> <p>3.83 Brighton & Hove is a tightly constrained urban area. With the sea to the south and the recently designated South Downs National Park boundaries drawn tightly to the city's edges</p>	<p>deliver sustainable energy infrastructure, and also may result in sustainable energy infrastructure not being delivered on viability and deliverability grounds. This makes the impact to be more uncertain against objective 18 (maximise sustainable energy) and is a change from the previous position.</p> <p>Point g: This modification clarifies that the developer will not be party to the delivery of the school. Addressed under Bullet 3 above.</p> <p>Point h and m: These modifications remove the requirement for delivery of improved linkages to SDNP and existing parks, and is considered to weaken the requirement, however is not considered to significantly change the scores against the relevant SA objectives (4 and 21) as presumably financial contributions towards these improvements</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>there are few opportunities for the city to physically expand. The development needs of the city are such that making effective use of a scarce land supply is essential. This is particularly so given the need to balance development requirements with the city's need for open space and the need to safeguard the city's highly valued natural and historic environments.</p> <p>3.84 Identifying land at Toad's Hole Valley for development represents an opportunity to secure new housing, employment, education, open space and community facilities for the city. It is also an opportunity to achieve exceptionally high standards of development, improve accessibility to this part of the city and secure new community facilities, green infrastructure and open space for residents of the new development and for adjacent neighbourhoods. As a result, development at Toad's Hole Valley should provide <u>aim to be</u> an exemplar of sustainable development and demonstrate that the city's UNESCO Biosphere Reserve objectives can be successfully integrated throughout the development scheme <u>subject to viability and deliverability</u>.</p> <p>3.85 In terms of design, care will be taken to ensure that future development will not adversely affect views to and from the South Downs National Park. A future planning brief for the area will provide guidance for the future development of the site.</p> <p>High standards of sustainable development</p> <p>3.86 Environmental sustainability will be central to the design and layout of development at Toad's Hole Valley which will be expected to meet <u>the requirements set out in CP8 Sustainable Buildings Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon or carbon neutral</u>. When it can be demonstrated that sustainable building standards cannot be met on site, mitigation measures will be sought in accordance with policy CP8 Sustainable Building and CP7 Infrastructure and Developer Contributions through Allowable Solutions or an agreed local offset mechanism. Development will be expected to address the principles of a One Planet approach⁸⁰ and incorporate measures to help mitigate or adapt to climate change, reduce greenhouse gas emissions, address fuel poverty and security and reduce the city's ecological footprint <u>subject to viability and</u></p>	<p>will achieve the same result in the long term.</p> <p>Point m: removal of the word "minimum" is not considered to change previous SA findings, as 2ha public open space is still a positive contribution.</p> <p>Point p: this additional wording is considered to strengthen the findings against SA objective 16 (local engagement), however is not considered to change the previous SA findings.</p> <p>All modifications to supporting text, no further impact than that already identified above.</p> <p>Revise SA accordingly.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p><u>deliverability</u>. Measures to help achieve the delivery of these objectives include:</p> <ul style="list-style-type: none"> • facilitating low ecological footprint lifestyles and practices, both on site and in the surrounding area; • rationalising site layout, street and building orientation to maximise passive design; • maximising the potential to generate energy renewably on the site; • delivering a decentralised energy network; • offering options to extend energy infrastructure to the surrounding built environment; • surface water run-off being controlled to maintain Greenfield run-off rates; and • on and off site tree-planting to help reduce the impact of urban heat island effect <p>3.87 The Brighton & Hove Energy Study has identified particular potential for networks for District Heating in and around this area as part of a long list of priority areas based upon straightforward installation opportunities and cost effectiveness. Development within the area will be expected to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks subject to viability <u>and deliverability</u>.</p> <p>Housing</p> <p>3.88 The city's housing requirements are such that it is important for the council to identify all suitable opportunities to secure new housing for the city's growing population (see Policy CP1). The scale of housing requirements forecast for the city coupled with the constrained nature of the city's urban land supply supports the planned release of this land at Toad's Hole Valley.</p> <p>3.89 The strategic allocation at Toad's Hole Valley will secure a significant amount of new housing provision of which a significant amount will be family-sized accommodation and affordable housing. Most of the city's urban sites are relatively small in terms of site area and more suited to flatted forms of development. The evidence base⁸¹ indicates that over the course of the plan period, an estimated 53 per cent of overall housing need and demand is likely to be for larger (3 and 4 bedroom) properties and in terms of house types</p>	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>demand/need is likely to be greater for houses (68 per cent) than for flats (32 per cent)⁸². In reality, the likelihood of delivering this mix of housing in the city is restricted by the types of sites likely to be brought forward for development. Planned development at Toad's Hole Valley allows for a better housing mix to be integrated within the overall development. For this reason the policy requires at least 50 per cent of the new housing to be family-sized. The specified density range should also enable the provision of a mix of housing types and sizes to achieve a choice in the range of housing at this location and ensure effective use of the site whilst recognising this is an area of lower densities compared to the other seven development areas.</p> <p>Employment Floorspace</p> <p>3.90 The allocation of <u>3.5 – 4.5 ha site area for employment use with the aim of accommodating a minimum of 25,000 sq m B1 employment floorspace at Toad's Hole Valley that will support a key growth sector in the economy - the knowledge based economy.</u> This will be done by providing the opportunity for high quality, sustainable and flexible business space offering move-on space for successful companies that need to expand and incubation space linked to the universities. The Employment Land Study Review 2012 indicated that in light of the identified needs for industrial floorspace over the plan period there was the potential for some of the B1a, B1b, employment floorspace to be substituted by B1c light industrial floorspace subject to appropriate masterplanning. Parking provided in connection with a future office use may be considered for informal weekend Park + Ride where the criteria set out in the supporting text of policy CP8 Sustainable Transport can be met. <u>It is considered that the most appropriate location for the employment area is in close proximity to the trunk road network in terms of accessibility and amenity.</u></p> <p>Secondary School and Infrastructure</p> <p>3.91 There is a strategic need for additional secondary school places in the city. Since 2005 the council has expanded a number of primary schools to provide an additional 11.5 forms of entry (345 more places) per year. These additional places will need to be provided in secondary schools by 2018. To go towards meeting this requirement it is proposed that <u>5 ha</u></p>	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>is reserved for a 6 form-entry secondary school is provided on the site as part of the mixed use development. This would have a minimum space requirement of 5 hectares. Playing fields provided with the school should be made available for dual use with the local community when not being used by the school.</p> <p>3.92 Southern Water has identified the need for water and wastewater infrastructure to serve new development and new development will need to connect to water and sewerage systems off site. This will be determined when development comes forward and where appropriate, developer contributions will be sought towards meeting these priorities.</p> <p>Phasing of Development</p> <p>3.93 It is important that new residential development is not completed and occupied prior to the provision of supporting, ancillary and community uses (including the school, ancillary shops and the <u>multi-use community facility</u>) <u>are provided at the appropriate time so as not to as this will lead to place</u> an unacceptable burden on existing facilities. Therefore careful consideration should be given to the phasing of development on the site. Additionally the new employment floorspace represents an important element of this mixed use scheme. <u>The land should be retained for employment purposes and development should be delivered to a phasing programme to be agreed. A minimum of a first phase of the employment land should be completed prior to completion of the housing element of the scheme to stimulate the market. This will ensure the site will contribute to the overall supply of office floorspace in the city and should be delivered alongside the residential phases of development with due regard to the overall delivery of office floorspace in the city (see CP3).</u></p> <p>Transport</p> <p>3.94 The key issue for any comprehensive redevelopment of Toad's Hole Valley is to ensure there are improved sustainable transport links to the area. Work will be undertaken with sustainable transport providers to ensure that links are improved. In terms of promoting cycling and walking, improved links to adjacent neighbourhoods and to designated national cycle routes will be sought as part of a redevelopment scheme.</p>	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>3.95 The site is bounded by King George VI Avenue which is a main route into Hove from the A27 Bypass. The redevelopment of Toad's Hole Valley represents an opportunity to improve safety on this steep and curving road. Redevelopment proposals should give consideration to slowing traffic, realigning the road, providing off-street parking in accordance with parking standards and improving the local environment. More details will be provided in the future planning brief.</p> <p><u>3.96</u> The development is likely to have an effect on the operation of the Devils Dyke Junction with the A27. Work will be undertaken with the Highways Agency and developer, taking into account sustainable measures to reduce vehicular traffic, and mitigation measures will be identified to ensure the safe movement of traffic on the A27. Options will be developed as part of the future planning brief.</p> <p><u>3.97</u> 3.96 Improved walking and cycling links to the South Downs National Park will be expected to be provided as part of the redevelopment scheme. This may involve improving existing links or providing new links to the Park.</p> <p>Public Open Space</p> <p><u>3.98</u> 3.97 Toad's Hole Valley is privately owned and not accessible to local residents. As part of a redevelopment provision a minimum of 2 ha of public open space should be provided as part of the scheme. This should include a children's playspace as well as a landscaped space and consideration should be given to ensuring long term maintenance.</p> <p><u>3.99</u> 3.98 As part of the scheme a minimum of 0.5 ha should be set aside for food growing by local residents within and in neighbourhoods near to, the site.</p> <p>Local Shops, Community facilities</p> <p><u>3.100</u> 3.99 In addition to a new school as part of the scheme <u>to the land reserved for a new school</u>, provision should be made for a multi-purpose community facility that may include a</p>	

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		<p>doctor's surgery, a community meeting place and National Park Interpretation/education facility. Further facilities required as part of a balanced and sustainable community will be for local shops and services.</p> <p>Site of Nature Conservation Importance (SNCI)</p> <p>3.101 3.400 The western bank of Toad's Hole Valley is an identified SNCI and lies outside the strategic allocation for the area. As part of <u>the proposed development</u> a future redevelopment measures will be expected to be undertaken to improve the quality and biodiversity of the SNCI and to improve walkways through the area and to the National Park.</p> <p><i>Note: Footnotes for the policy have not been amended and remain as follows:</i></p> <p>⁷⁹ National Parks have two purposes under Section 62 of the Environment Act 1995:</p> <ul style="list-style-type: none"> • Conserve and enhance their natural beauty and cultural heritage; and • promote public understanding and enjoyment of their special qualities. <p>⁸⁰ See table 2, page 24</p> <p>⁸¹ Implications of Demographic Change on Demand for Homes in Brighton & Hove, GL Hearn, March 2012.</p> <p>⁸² See Figure 11 and 12, Implications of Demographic Change on Demand for Homes in Brighton & Hove, March 2012.</p>	
PM046	DA8 Shoreham Harbour, Illustrativ e diagram and Key Diagram, page 87& 233	Amend Policies Map, Key Diagram, and Key Illustration to remove Boundary Road / Station Road from the Development Area boundary, and to make the boundary definite rather than indicative, to be consistent with draft Shoreham Harbour Joint Area Action Plan.	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
PM047	DA8 Shoreha m Harbour, paragrap h 3.103, page 88	<p>Additional bullet point:</p> <ul style="list-style-type: none"> • <u>To maximise opportunities to support the City’s sustainability objectives through large-scale zero and low-carbon energy technologies to serve the Harbour and wider city, particularly those that take advantage of the Harbour’s coastal location. In particular the City Council will encourage any opportunities that arise to incorporate waste heat or other heat sources into the heat networks for the city.</u> 	<p>This additional wording, along with the wording in other main modifications strengthens the SA score against the objective 18 (sustainable energy) and is considered to change the previous score from positive to significantly positive.</p> <p>Amend SA accordingly.</p>
PM048	DA8 Shoreha m Harbour page 88 first paragrap h	<p>DA8 – Shoreham Harbour</p> <p>The Council will work with Adur District Council, West Sussex County Council, Shoreham Port Authority and other key partners to support the long term regeneration of Shoreham Harbour and immediately surrounding areas. A Joint Area Action Plan (JAAP) is currently being prepared that will contain detailed policies for the harbour area- <u>to address a range of issues, including the provision of infrastructure.</u></p>	<p>This modification builds upon the existing supporting text which already stated that infrastructure requirements will be set out in the Infrastructure Delivery Plan. This modification is not considered to alter the previous SA score or findings.</p>
PM049	DA8 Shoreha m Harbour, page 88, section A	<p>DA8.A. Development Capacity</p> <p>400 300 new residential, units within Brighton & Hove (which are included as part of the city’s long term overall housing target)</p>	<p>This is a 25% reduction in housing to be delivered within the area. However, delivery of 300 units is still a significant amount given the constraints of the area, and is not considered to change the impacts against the housing objective. However, revise SA accordingly to reflect</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
			current quantum.
PM050	DA8 Shoreha m Harbour page 89/90	<u>i) South Quayside / Port Operational:</u>	No impact on SA.
PM051	DA8 Shoreha m Harbour page 89/90	<u>ii) Aldrington Basin:</u> Area priorities: a) <u>To designate Aldrington Basin as a Strategic Employment/Mixed-use Area To to accommodate a vibrant mix of new and improved port operational facilities as well as compatible non-port employment uses, including A and B use classes. The balance of land uses will be determined in accordance with the future development brief that will form part of the JAAP.</u> b) To maximise intensification and redevelopment opportunities of existing lower grade, vacant and under-used spaces. c) To accommodate appropriately located mixed-use residential development, in accordance with a future brief that will form part of the JAAP. d) To improve access arrangements and townscape upgrades to create better linkages to surrounding areas. d) <u>To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, whilst respecting and enhancing the character and environment of surrounding areas.</u> e) To ensure that all development takes into account the findings and recommendations of the 2012 Strategic Flood Risk Assessment and any	B (ii)a and c: No impact on SA. Modification of an editorial nature. B(ii)d: No impact on SA. Modification of an editorial nature. B(ii)e: No impact on SA. Modification of an editorial nature. B(ii)f: Much of the Development Area lies within the new AQMA 2013 and NO2 levels at some roadside locations in this area still remain above the legal limit, partially due to volume of traffic, particularly HGVs, as well as the streetscape. Although these new policy points are considered to be a

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>subsequent revisions <u>current Flood Risk Assessments.</u></p> <p>f) <u>To ensure that new development proposals take into account impact on local air quality and noise and that improvements and/or mitigation are sought wherever possible.</u>⁸⁴</p> <p>Add new footnote:</p> <p>⁸⁴ Part of this character area lies within the 2013 Air Quality Management Area.</p>	<p>positive addition, they are not considered to change the previous negative and mixed SA scores against objective 2 (air quality) and 13 (health), as any new development and associated additional traffic will add to the existing problem. No change in SA score from previous position, however update SA to refer to new AQMA designation.</p>
PM052	DA8 Shoreham Harbour page 90	<p>iii) <u>North Quayside / South Portslade</u> Area priorities:</p> <p>a) To develop North Quayside as a new and improved Port operational area accommodating new and relocated port uses with limited land reclamation and a new access road (within the Port boundary) in line with the Port Masterplan.</p> <p>b) To designate South Portslade Industrial Area as a Strategic Employment/Mixed-use Area, including some appropriately located residential development, in accordance with a future brief that will form part of the JAAP.</p> <p>c) <u>To secure improvements to legibility, permeability and connectivity through high quality building design, townscape and public realm, whilst respecting and enhancing the character and environment of surrounding areas.</u></p> <p>c) To improve connections and townscape around key linkages including Boundary Road/Station Road (B2194) district retailing centre, Church Road (B2193) and along the A259.</p> <p>d) To ensure that all development takes in to account the findings and recommendations of the 2012 Strategic Flood Risk Assessment and any</p>	<p>B (iii)b: No impact on SA. Modification of an editorial nature</p> <p>B(iii)c: Strengthens the policy however not considered to significantly change the previous SA findings.</p> <p>B(iii)d: No impact on SA. Modification of an editorial nature</p> <p>B(iii)e: see above.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>subsequent revisions <u>current Flood Risk Assessment.</u></p> <p>e) To ensure that new development proposals take account of impact on local air quality noise and air quality impacts and that improvements are sought wherever possible. <u>To ensure that new development proposals take into account impact on local air quality and noise and that improvements and/or mitigation are sought wherever possible.</u></p>	
PM053	DA8 Shoreham Harbour, Paragraph 3.105 and footnote 84, Page 91	<p>These aspirations for the Shoreham Harbour area were subsequently identified in the Regional Spatial Strategy (RSS) for the South East (May 2009). The published South East Plan⁸⁴ indicated that the Sussex Coast was a priority area for regeneration (SCT2) and specifically identified d Shoreham Harbour as a Growth Point (SCT1). The harbour is one of three sites in Adur District described as requiring coordinated action to unlock economic development potential (Policy SCT3). An interim figure of 10,000 dwellings was identified subject to detailed studies.</p> <p>⁸⁴ Regional strategies remain part of the development plan until they are abolished by Order using powers taken in the Localism Act. <u>The Regional Strategy for the South East (Part Revocation) Order 2013 came into force on 25 March 2013. Therefore, the South East Plan no longer forms part of the Development Plan for the Plan area.</u></p>	No impact on SA. Modification of an editorial nature.
PM054	DA8 Shoreham Harbour, Paragraph 3.109, Pages 91 – 92	<p>The Port is important regionally for the landing, processing and handling of minerals and as such mineral wharf <u>facilities</u> are safeguarded under "Policy WMP15 - Safeguarding railheads and wharves" of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (<u>adopted February 2013</u>). As a result development proposals affecting minerals wharves are required to demonstrate that there is no net loss of capacity for handling minerals within the pPort. A similar policy is likely to <u>may</u> be included within the emerging West Sussex Minerals Local Plan. The two waste <u>mineral</u> planning authorities (<u>Brighton & Hove and West Sussex</u>) are currently preparing guidance in liaison with the Port Authority to set out clearly what the implications of the policy are and what is required of applicants as part of the planning process. <u>The mechanism for safeguarding minerals handling capacity within the Port is to be considered in detail in the JAAP.</u></p>	No impact on SA. Modification of an editorial nature.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
PM055	DA8 Shoreha m Harbour, Paragrap h 3.110, Page 92	The Shoreham Harbour Regeneration Partnership (comprising Adur District Council, Brighton & Hove City Council and West Sussex County Council) have prepared <u>are in the process of preparing</u> an Investment Strategy which <u>will</u> provides a work programme for delivering the regeneration proposals and will underpin the emerging JAAP. The infrastructure requirements for the Harbour area will be set out in the Infrastructure Delivery Plans (IDP) that underpins the City Plan and the Adur Local Plan.	No impact on SA. Modification of an editorial nature.
PM056	SA1 The Seafront, page 96	SA1.C.1 Provision of <u>a minimum</u> 400 residential units	This modification creates a certain degree of uncertainty. The positive outcomes of more than 400 homes being delivered could be stronger, however the adverse impacts could also be greater. Without knowing the exact amount of housing that could be delivered in this location, it is not possible to accurately predict what impacts will be. It is therefore recommended to amend the explanatory text to refer to the minimum amount, and specify that any positive and negative impacts could be greater, depending on the actual final amounts of development delivered.
PM057	SA1 The Seafront, page 97	Amend footnote 89: ⁸⁹ Seafront Strategy is due to be adopted Spring 2013 <u>in 2015</u> .	No impact.

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
PM058	SA1 The Seafront, page 99	3.122 ... The Air Quality Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified certain junctions on the A259 as exceeding the annual nitrogen dioxide air quality objectives and the A259 between Arundel Road and the city boundary with Adur District Council is included within the 2008 declared Air Quality Management Area. <u>Much of the A259 corridor is included within the 2013 Air Quality Management Area.</u>	No impact on SA. This modification is considered to be of an editorial nature.
PM059	SA1 The Seafront, Paragraph 3.123, Page 99	Insert new sentence at end of paragraph: <u>The Marine Management Organisation will be preparing a marine plan for the south coast of England which will inform and guide marine users and regulators and seek to manage the sustainable development of marine industries such as wind farms, shipping, marine aggregates and fishing alongside the need to conserve and protect marine species, habitats and leisure uses. Where appropriate regard will be had to the marine plan in Part 2 of the City Plan.</u>	No impact on SA. For information purposes.
PM060	SA1 The Seafront, Paragraph 3.124, Page 99	The 'Brighton Marina to River Adur Strategy' recommends the maintenance of existing coastal defences with some enlargement of groynes and beaches in the King Alfred area and a scheme to upgrade defences between the western end of Hove Lagoon and the River Adur through Shoreham Port. The Strategy will be <u>is being</u> revised following advice and funding from Defra.	NO impact on SA.
PM061	SA2 Central Brighton, page 103	<u>7. Ensure new development proposals take into account impact on local air quality and that improvements and/ or mitigation are sought wherever possible. The council will work with public transport providers, freight transport operators and secure road junction and urban realm improvements to reduce congestion and emissions, to improve air quality and encourage improved pedestrian and cycling movements within the city centre (See CP13).</u>	These modifications are considered to strengthen the policy by specifically requiring development to take account of their impact on local air quality and provide improvements or mitigation. However, these modifications are not considered to significantly change the previous SA findings which

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
			found the policy to have mixed impacts on air quality. However, as the AQMA area has changed, it is recommended to update the SA to ensure it reflects the most up to date position.
PM062	SA2 Central Brighton supporting text, page 106	<p>3.141 Central Brighton is designated <u>within</u> an Air Quality Management Area <u>with North Street, Queen's Road and Western Road exceeding the annual nitrogen dioxide air quality objectives</u>¹⁰³. <u>New development proposals within the AQMA should take account of their impact on local air quality, be consistent with the council Air Quality Action Plan and minimise increased exposure to existing poor air quality. Where appropriate improvements and/or mitigation measures will be sought.</u> and <u>The council's Air Quality Action Plan sets out the priorities to improve local air quality and the Local Transport Plan and subsequent updates will address junction improvements and traffic management in the area. The council is investigating the development of a Low Emission Zone in the central city area. Supporting this, there will be a continuing programme scheme of urban realm improvements</u>¹⁰⁴ which will be informed, undertaken and developed as part of a consistent vision based on the findings of the Public Space, Public Life Study (2007).</p> <p>¹⁰³ Air Quality Management Area 2013 Further Review and Assessment (2010) and the Air Quality Action Plan (2011) identified that West St, North St, Queen's Road and Western Road exceed the government's air quality objectives for nitrogen dioxides.</p>	See PM062 above.
PM063	SA3	<p><u>The Level – the vibrant recreation and leisure space</u></p> <ul style="list-style-type: none"> • Pursue a comprehensive landscaping scheme for The Level that will distinguish functions of spaces, enhance entrances, extend the range of facilities and improve public safety. • Improve the legibility and safety of key pedestrian and cycle links to London Road and the Open Market. • Enhance the public realm to the south of The Level. 	No impact on SA. Amendment reflective of stage of scheme which is now complete.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		<ul style="list-style-type: none"> ● Ensure the specific provision of facilities for older younger people with appropriate activity areas. <p>Amend paragraph 3.145:</p> <p>3.145 ... New landscaping and planting must also reinforce existing local character and may include productive planting that contributes towards improving urban food productivity where appropriate. A Landscape Design Report was approved for The Level in 2011, following public consultation, and forms a master plan for the comprehensive improvement of the park in a manner which will restore and re-animate this key public space. The Level was restored and landscaped in line with the master plan for the comprehensive improvement of the park and was re-opened in 2013.</p>	
PM064	SA4	<p>3.154 In many instances the South Downs National Park boundary is contiguous with the built up urban edge of the city. The urban fringe is therefore now made up of ‘pockets’ of residual green space rather than any homogenous green ‘belt’ around the city. These areas are vulnerable to development pressures, farm fragmentation and anti-social behaviour such as fly-tipping, vandalism and inappropriate recreational activity such as illegal motor biking. Elsewhere there has been piecemeal enclosure both for the keeping of horses and garden use. Much of the city’s urban fringe meets the NPPF definition of existing open space and represents a significant proportion of the city’s open space resource. The urban fringe is also important in terms of biodiversity and designations include the South Downs Way Ahead Nature Improvement Area, Local Nature Reserves (LNRs) and Sites of Nature Conservation Interest.#</p> <p>3.155 <u>Within the urban fringe, there will be some opportunities for development to help meet citywide needs. The appropriate nature and form of any such development will need to reflect the need</u> Careful use and management of land within the urban fringe is therefore essential in terms of helping to retain the setting of the city in its downland landscape.</p>	<p>The amendments bring a greater degree of certainty that residential development will take place in this location, which could be before or after Part 2 of the City Plan (site allocations stage). This has positive implications for housing but could impact adversely upon other environmental objectives. The wording which requires mitigation in order for development to be permitted should minimise the risk of adverse impacts.</p> <p>Amend SA accordingly to</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>SA4 Urban Fringe</p> <p>The <u>Where appropriate, the</u> council will promote and support the careful use and management of land within the urban fringe to achieve the following objectives:</p> <ol style="list-style-type: none"> 1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city. 2. Securing better management of the urban fringe, environmental improvements and safe public access to the countryside through sustainable means. 3. The promotion of the urban fringe <u>land</u> as part of the city's green network and, <u>where appropriate</u>, encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP10 Biodiversity). 4. The protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface water runoff and soil erosion. 5. The creation of 'gateway' facilities and interpretative facilities in connection with the South Downs National Park to support sustainable tourism. <p>Development within the urban fringe will not be permitted except where:</p> <ol style="list-style-type: none"> a) a site has been allocated for development in a development plan document; or b) a countryside location can be justified; <p><u>and where it can be clearly demonstrated that:</u></p>	<p>fully assess changes.</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		<p>c) the proposal has <u>had</u> regard to the downland landscape setting of the city; d)-all <u>any</u> adverse impacts of development are minimised and appropriately <u>mitigated</u> <u>and/or</u> compensated for; and e) where appropriate, the proposal helps to achieve the policy objectives set out above.</p> <p><u>Should proposals for development come forward prior to the adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material planning consideration in the determination of applications for residential development within the urban fringe.</u></p> <p>Insert the following new Paragraph between 3.157 and 3.158 :</p> <p><u>Some land within the city’s urban fringe has been identified as having potential to help meet the city’s housing requirements (see Part B, Policy CP1 Housing Delivery). Sites identified through the 2014 Urban Fringe Assessment Study (or parts of sites where relevant) will be considered to have potential for housing in the Strategic Housing Land Availability Assessment exercise. Further consideration and a more detailed assessment of potential housing sites will be undertaken to inform allocations made in Part 2 of the City Plan with a particular emphasis on delivering housing to meet local needs. As part of this process, the City Council will consider how best to ensure that opportunities for community land trusts, community-led development, right to build, and housing co-operatives are brought forward/ safeguarded in order to maximise housing opportunities that meet local housing needs. This will be taken forward through the City Plan Part 2. Sites coming forward for development ahead of the preparation of Part 2 of the City Plan will need to address criteria c) to e) set out in Policy SA4 above and satisfy detailed information requirements[#] at the planning application stage.</u></p> <p>Add new footnote:</p> <p>[#] This may include, for example, landscape assessment, ecology and archaeology surveys, traffic</p>	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<u>assessments and possibly Environmental Impact Assessment.</u>	
PM065	SA5 The South Downs, pages 114 - 117	<p>SA5 The <u>Setting of the South Downs National Park</u></p> <p>The Council will work in partnership with the South Downs National Park Authority and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs National Park. Proposals within the setting of the National Park must have regard to the impact on the National Park, in particular the purposes of the National Park and the ability of the South Downs National Park Authority to deliver its duty. Development within the setting of the National Park:</p> <p><u>a. Must have due regard to its impact on the South Downs National Park, its setting and upon Should be consistent with and not prejudice National Park purposes and, where appropriate, the duty of the National Park Authority Any adverse impacts must be minimised and appropriate mitigation or compensatory measures included. Such measures, including proposed enhancements, should have regard to landscape character and impact;</u></p> <p><u>b. Should be consistent with National Park purposes and duty and mMust respect and not significantly harm the National Park and its setting, in accordance with Section 62 of the Environment Act 1995. or prejudice National Park purposes. Any adverse impacts must be minimised and appropriate mitigation or compensatory measures included. Such measures, including proposed enhancements, should have regard to landscape character and impacts; and</u></p> <p><u>c. Should have due regard to the City Council’s priorities for the South Downs where appropriate.</u></p> <p>The council, which is not the planning authority for the National Park but is a key landowner, recognises the following priorities for the south downs and National Park land that falls within the city’s administrative area:</p> <p>1. To promote Biosphere Reserve principles and objectives, bringing people and nature together.</p>	<p>Policy SA5 has undergone significant changes and requires full appraisal to ascertain impact against all of the SA objectives. The main thrust of the policy is still the protection of the SDNP and there is more reference to protection of the setting, over which BHCC has more influence due to planning responsibilities. Many of the previous policy requirements have been moved and are now listed as priorities within the supporting text instead, where they carry less weight. This changes some of the scores against the SA objectives, as less weight is applied to the supporting text.</p> <p>Full SA required.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>2. To promote sustainable land use management systems on the downs with greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives;</p> <p>3. To conserve and enhance downland habitats and species to meet Biodiversity Action Plan (BAP) targets and recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework (see CP10 Biodiversity and CP16 Open Space);</p> <p>4. To protect scheduled ancient monuments¹⁴⁴ and other downland features;</p> <p>5. To protect sensitive aquifer protection zones and address catchment flood management issues.</p> <p>6. To increase the amount of accessible land adjacent to the urban area and enhance access from the urban area to the Downs by sustainable transport including by walking, cycling and public transport modes (see CP9 Sustainable Transport and CP18 Healthy City).</p> <p>7. To promote a stronger visitor experience between the city and the South Downs, facilitate sustainable eco tourism in the South Downs and the provision of gateway facilities to the South Downs National Park. In particular, to recognise the role of Stanmer Park within the National Park and the need to manage parking and traffic in order to reduce the risk of degradation of gateway areas and facilitate improved sustainable transport links. (See SA4 Urban Fringe, CP5 Culture and Tourism and CP9 Sustainable Transport).</p>	
PM066	SA5 The South Downs, amendments to	3.165 The purpose of this policy is to provide clear planning guidance for proposals within the setting of the National Park and also as a strategic policy, to set out the council's aspirations for the South Downs <u>to inform planning proposals</u> or including land within the National Park future partnership working with the National Park Authority <u>as appropriate</u> . The majority of this land <u>the countryside within the city's administrative boundary</u> is owned	As above. Full SA of SA5 to take place.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	paragra hs 3.165, 3.166, 3.168, Footnote 111, pages 116 – 117	<p>and leased to tenants by the city council....</p> <p>3.166 An important role of the National Park Authority is to promote understanding of the South Downs and to promote access to the <u>National</u> Park by sustainable means. A number of these measures are likely to be implemented within the administrative area of Brighton and Hove and this emphasises the need for good partnership working. Stanmer Park is a Grade II registered park of special historic interest: a 485 hectare rural estate with landscaped park, buildings and gardens, a village, farmland, woodland and amenity grassland used as public open space and all falling within the National Park with much in the ownership of the city council. It is covered by a variety of nature conservation and conservation designations and is a major recreational resource for residents of and visitors to the city. <u>Stanmer Park itself will be covered by the South Downs National Park Local Plan, however, there may be planning implications for the City Council because it Brighton & Hove City Council seeks to promote access to the South Downs by developing Stanmer Park as a gateway, promoting access and improving public transport. Similarly There is also the need to manage parking at gateway locations in order to reduce the risk of degradation of these areas and to link them to a sustainable transport system could have planning implications for the City Council.</u></p> <p><u>3.168 The council, which is not the planning authority for the National Park but is a key landowner, recognises the following priorities for the South Downs within the city's administrative area and will take them into account in future partnership working with the National Park Authority:</u></p> <ol style="list-style-type: none"> <u>1. To promote Biosphere Reserve principles and objectives, bringing people and nature together;</u> <u>2. To promote sustainable land use management systems on the Downs with greater emphasis on local healthy food production, diversification and farming practices that are sympathetic to wider downland objectives;</u> <u>3. To conserve and enhance downland habitats and species to meet Biodiversity Action Plan</u> 	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p><u>(BAP) targets and recognise the role of the Downs in the city's Green Network/Nature Improvement Area/open space framework (see CP10 Biodiversity and CP16 Open Space);</u></p> <p><u>4. To protect scheduled monuments¹¹³ and other downland features;</u></p> <p><u>5. To protect sensitive aquifer protection zones and address catchment flood management issues;</u></p> <p><u>6. To increase the amount of accessible land adjacent to the urban area and enhance access from the urban area to the Downs by sustainable transport including by walking, cycling and public transport modes (see CP9 Sustainable Transport and CP18 Healthy City); and</u></p> <p><u>7. To promote a stronger visitor experience between the city and the South Downs, facilitate sustainable eco tourism in the South Downs and provide gateway facilities to the South Downs National Park. In particular, to recognise the role of Stanmer Park within the National Park and the need to manage parking and traffic in order to reduce the risk of degradation of gateway areas and facilitate improved sustainable transport links. (See SA4 Urban Fringe, CP5 Culture and Tourism and CP9 Sustainable Transport).</u></p> <p>Renumber footnotes 112 and 113 to take into account the deletion of footnote 111. Reinsert footnote 111 as shown above as footnote 113 respectively, to read as follows: ¹¹³ <u>A statutorily protected building, structure or feature of national importance because of its archaeological and historic interest.</u></p>	
PM067	SA6 Sustainable Neighbourhoods, Footnote 115,	<p>Amend footnote 115: ¹¹⁵ <u>Child Poverty Strategy 2014 Brighton & Hove Child Poverty Commissioning Strategy 2012-2015 (2012)</u></p>	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	Page 119		
PM068	Policy SA6, Part A.8, page 120	8. Deliver balanced communities through the requirement for new residential development to provide an appropriate amount of affordable housing, mix of dwelling sizes and tenure types and <u>to ensure new housing meets lifetime homes standards and minimum dwelling space standards.</u> In areas where there is a concentration of social rented housing, a better choice of housing tenures will be sought (see CP1 Housing Delivery, <u>CP19 Housing Mix</u> and CP20 Affordable Housing).	This modification is considered to strengthen the policy against the housing (5) and health objectives (13) but is not not considered to bring about a significant change to the previous SA score. (Nb SA6 last assessed at draft city plan stage (May 2012))
PM069	Policy SA6, Paragraph 3.172 page 121	Add an additional bullet point to the list of aims: <ul style="list-style-type: none"> • <u>ensure new residential development provides for an appropriate mix of dwelling types and tenures and meets minimum space standards.</u> 	As above.
PM070	Policy SA6, Paragraph 3.173 and Footnote 118, page 121	<p>The policy requires joint working between partners, including other public agencies for example the NHS commissioning organisations and health care providers, the police, education providers (schools, colleges and universities), community and community and voluntary sector organisations, transport providers, businesses, and residents. Brighton & Hove <u>Connected</u>¹¹⁸ is the Local Strategic Partnership for the city. Brighton & Hove <u>Connected</u> 's Strategic Partnership¹¹⁸ and its 'family of partnerships'¹¹⁹ will help to enable effective partnership working.</p> <p>Amend footnote 118:</p> <p>¹¹⁸The Brighton & Hove <u>Connected Strategic Partnership</u> brings together representatives from the local statutory, voluntary, community and private sectors to address local problems, allocate funding, and discuss strategies and initiatives. The first Local Strategic Partnerships were set up in 2000. They are responsible for agreeing an overarching Sustainable Community Strategy for the area. They aim to encourage joint working, and community</p>	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications										
		involvement with the general aim of ensuring resources are better allocated at a local level.											
PM071	SA6 Sustaina ble Neighbou hoods,Fo otnote 122, page 124	<p>Amend footnote:</p> <p>¹²²Open Space, Sport and Recreation Study 2009 <u>2008</u> establishes a baseline of existing provision and proposes standards for quality, quantity and accessibility. It identifies priorities for future open space, recreation and sport provision.</p>	No impact on SA.										
PM072	CP1	<p>Amend first sentence in Part A of policy:</p> <p>The council will make provision for at least 11,300 <u>13,200</u> new homes to be built over the plan period 2010 – 2030 (this equates to an annual average rate of provision of 565 <u>660</u> dwellings).</p> <p>Amend Part B of Policy:</p> <p>B: Distribution of new housing.</p> <p>New housing will be delivered broadly in line with the following distribution:</p> <table border="1" data-bbox="409 1110 1357 1407"> <thead> <tr> <th data-bbox="409 1110 1003 1150">Area / Source of Supply</th> <th data-bbox="1008 1110 1357 1150">No. of new homes</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 1153 1003 1185">Development Area</td> <td data-bbox="1008 1153 1357 1185"></td> </tr> <tr> <td data-bbox="409 1189 1003 1262">DA1 – Brighton Centre and Churchill Square Area</td> <td data-bbox="1008 1189 1357 1262">20</td> </tr> <tr> <td data-bbox="409 1265 1003 1339">DA2 – Brighton Marina, Gas Works and Black Rock Area</td> <td data-bbox="1008 1265 1357 1339">1940</td> </tr> <tr> <td data-bbox="409 1342 1003 1407">DA3 – Lewes Road Area</td> <td data-bbox="1008 1342 1357 1407">840 <u>875</u></td> </tr> </tbody> </table>	Area / Source of Supply	No. of new homes	Development Area		DA1 – Brighton Centre and Churchill Square Area	20	DA2 – Brighton Marina, Gas Works and Black Rock Area	1940	DA3 – Lewes Road Area	840 <u>875</u>	<p>This strengthens the potential for positive impact on the housing objective, and provides a significant amount of housing for the city, although does not meet the updated OAN in full.</p> <p>There has been changes to some of the quantum to be delivered across the city. In addition, the table sets out 1060 units will be delivered across the urban fringe, based on the Urban Fringe Assessment, and also allows for windfall across the plan period. These amendments have potential for various impacts on SA objectives, including environmental and</p>
Area / Source of Supply	No. of new homes												
Development Area													
DA1 – Brighton Centre and Churchill Square Area	20												
DA2 – Brighton Marina, Gas Works and Black Rock Area	1940												
DA3 – Lewes Road Area	840 <u>875</u>												

Ref	Policy/ Paragraph	Proposed Modification		Summary of Sustainability Implications
		DA4 – New England Quarter and London Road Area	4185 1130	social objectives. Amend SA to fully assess implications.
		DA5 – Eastern Road and Edward Street Area	470 515	
		DA6 – Hove Station Area	630 525	
		DA7 –Toad’s Hole Valley	700	
		DA8 – Shoreham Harbour	400 300	
		Development Area Total	6155 6005	
		Development Across Rest of City:	3945	
		a) <u>Within the built up area</u>	<u>4130</u>	
		b) <u>Within the urban fringe</u> [#]	<u>1060</u>	
		Small identified sites	650 765	
		Small Windfall Development	600 ¹²⁵ 1250 ¹²⁵	
		Total	11,350 13,210	
		Insert footnote:		
		<u># As defined in policy SA4 the City Plan Part 1.</u>		
		Amend footnote 125:		
		¹²⁵ An allowance for small windfall development has been made for the final 6 years of the plan period 2024–2030; although it is anticipated that small windfall development will contribute to meeting the housing target in earlier parts of the plan period. An allowance for small windfall development has been made across the plan		

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p><u>period. See 2014 SHLAA.</u></p> <p>4.2 Based on demographic factors, (reflecting scenarios of population and household growth), the city's full (unconstrained) housing requirement, for both market and affordable housing, over the plan period has been assessed at 15,800 new homes to 2030. This would equate to an annual average of 790 new homes per annum) <u>A series of studies indicate that to meet in full the city's 'objectively assessed housing need' (housing demand and need) over the plan period to 2030 could mean needing to build between 900 – 1200 dwellings per annum or 18,000 – 24,000 dwellings to 2030¹²⁷.</u></p> <p>Amend footnote 127:</p> <p>¹²⁷<u>Brighton & Hove City Council, Housing Requirements Study Update, GL Hearn, October 2012 Assessment of Housing Development Needs Study: Sussex Coast HMA, May 2014.</u></p> <p>4.4 The City Plan housing target for a minimum of 41,300 <u>13,200</u> new homes reflects the capacity and availability of land/sites in the city, the need to provide for a mix of homes to support the growth and maintenance of sustainable communities, the need to make provision in the city for other essential development (for employment, retail, health and education facilities, other community and leisure facilities) and the need to respect the historic, built and natural environment of the city.</p> <p>...</p> <p>4.6 The spatial strategy for the city is set out earlier in this Plan (see Spatial Strategy, Section 2). In broad terms, the strategy seeks to direct a significant amount of new development to eight identified Development Areas (see Policies DA1-8) which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved; are areas which offer significant capacity for new development and are areas where new development and/or regeneration and renewal will secure substantial benefits for the city. <u>The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites within the built up</u></p>	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p><u>area but it also acknowledges that some housing development will come forward from some of the city's urban fringe sites. This is reflected in Part B of Policy CP1.</u></p> <p>4.7 The eight Development Areas account for just over half (54%) <u>45%</u> of the planned amount of new housing for the city. Within the Development Areas, the City Plan makes strategic allocations to secure the delivery of 3235 new dwellings (see spatial policies DA2 – DA8). In other parts of the city, there are also a significant range of opportunities for new residential development (through, for example conversions, redevelopment and changes of use) and such development will help to promote and secure the establishment of sustainable communities. Residential development will be required to respect the local character and distinctiveness of neighbourhoods (see also SA6, CP12 and CP14).</p> <p>4.8 Over the last 15 years¹²⁸ the average rate of new housing development in Brighton & Hove has been around 550 <u>540</u> dwellings per annum. More recently, annual rates of housing delivery have been far lower than this reflecting the ongoing impacts of global economic recession¹²⁹.</p> <p>Amend footnote 128:</p> <p>¹²⁸ 1997/8 – 2011/12, Residential completions data. <u>1999/00 – 2013/14 Residential Completions Data.</u></p> <p>...</p> <p>4.10 The city's housing target implies an annual average rate of 565 <u>660</u> dwellings per annum over the plan period as a whole. Based on the 20124 SHLAA update, the <u>housing trajectory¹³⁰ demonstrates that housing delivery in the city has been below this in the first four years of the plan period (2010-2014), reflecting the impacts of economic recession. The trajectory anticipates that housing delivery is likely to achieve at least this rate in the first ten years after plan adoption (2014 – 2024) will increase in the (post adoption) five year supply period 2014 – 2019 and looks likely to achieve the planned average delivery rate of 660 units per annum. In the following six to ten year supply period (2019 – 2024), housing delivery rates are anticipated to increase significantly with delivery coming through from a</u></p>	

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		<p>number of the city’s larger strategic sites. <u>For the post 2024 period, the trajectory indicates that housing delivery is again likely to exceed the planned average delivery rate</u></p> <p>The council’s Housing Implementation Strategy (HIS) identifies a range of <u>positive planning management actions and measures to ensure that housing delivery is achieved</u> assist in <u>across the plan period in accordance with guidance in the NPPF for maintaining a five year supply of deliverable housing.</u> bringing forward sites for development should this prove necessary. The HIS also identifies that further site allocations will be made through the preparation of Part 2 of the City Plan.</p> <p>Amend footnote 130:</p> <p>¹³⁰As informed by the 2012 SHLAA Update <u>the 2014 Revised Trajectory.</u></p> <p>Replace Figure 2 with revised Housing Trajectory:</p> <p>Figure 2: Housing Trajectory 2010 – 2030 (Based on 2012 SHLAA)</p> <p>Figure 2: <u>Housing Trajectory 2010 – 2030 (Based on 2012 SHLAA) 2010 – 2030 (Based on SHLAA 2014 Update)</u></p> <p>Amend footnote 131:</p> <p>¹³¹SHLAA 2012 <u>2014</u> Update.</p> <p>4.12 The table illustrates that approximately 3230 <u>3,740</u> dwellings have either already been built since 2010 or are currently ‘committed’ for development in terms of either sites having an extant planning permission or an allocation in the 2005 Brighton & Hove Local Plan. This plan makes strategic site allocations to achieve a further 3635 dwellings. Further capacity is identified for an additional 3885 <u>4585</u> dwellings and appropriate site allocations will need to be made in Part 2 of the City Plan. These ‘identified’ sources comprise <u>90%</u> of the overall housing target to 2030.</p>	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications																																																																																																									
		<p>Table 4: Housing Delivery, Supply Breakdown 2010 – 2030 (Based on 2012 <u>2014</u> SHLAA)</p> <table border="1"> <thead> <tr> <th data-bbox="405 363 638 499">Spatial Area</th> <th data-bbox="642 363 831 499">Already Built or Committed</th> <th data-bbox="835 363 1023 499">Strategic Allocations</th> <th data-bbox="1028 363 1189 499">Broad Locations / <u>Source</u></th> <th data-bbox="1193 363 1355 499">Further Capacity Identified in SHLAA</th> <th data-bbox="1359 363 1503 499">Allowance For windfall</th> <th data-bbox="1507 363 1619 499">Total</th> </tr> </thead> <tbody> <tr> <td>DA</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>DA1</td> <td>13</td> <td>0</td> <td></td> <td>7</td> <td></td> <td>20</td> </tr> <tr> <td>DA2</td> <td>855</td> <td>1085</td> <td></td> <td>0</td> <td></td> <td>1940</td> </tr> <tr> <td>DA3</td> <td>420 <u>126</u></td> <td>300</td> <td></td> <td>390 <u>449</u></td> <td></td> <td>850 <u>875</u></td> </tr> <tr> <td>DA4</td> <td>285 <u>380</u></td> <td>615</td> <td></td> <td>285 <u>135</u></td> <td></td> <td>1185 <u>1130</u></td> </tr> <tr> <td>DA5</td> <td>0 <u>10</u></td> <td>335</td> <td></td> <td>135 <u>170</u></td> <td></td> <td>470 <u>515</u></td> </tr> <tr> <td>DA6</td> <td>420 <u>90</u></td> <td>200</td> <td></td> <td>340 <u>235</u></td> <td></td> <td>630 <u>525</u></td> </tr> <tr> <td>DA7</td> <td>0</td> <td>700</td> <td></td> <td>0</td> <td></td> <td>700</td> </tr> <tr> <td>DA8</td> <td>0 <u>52</u></td> <td></td> <td>400 <u>248</u></td> <td></td> <td></td> <td>400 <u>300</u></td> </tr> <tr> <td>DA Total</td> <td>1390 <u>1525</u></td> <td>3235</td> <td>400 <u>250</u></td> <td>1130 <u>1000</u></td> <td></td> <td>6155 <u>6005</u></td> </tr> <tr> <td>Rest of City</td> <td>1190</td> <td></td> <td>500</td> <td>1856</td> <td></td> <td>3945</td> </tr> <tr> <td> a) <u>Built up area</u></td> <td><u>1450</u></td> <td>400</td> <td><u>390</u></td> <td><u>2147</u></td> <td></td> <td><u>4130</u></td> </tr> <tr> <td> b) <u>Urban Fringe</u></td> <td></td> <td></td> <td></td> <td><u>1060</u></td> <td></td> <td><u>1060</u></td> </tr> <tr> <td>Small id. Sites</td> <td>650 <u>765</u></td> <td></td> <td></td> <td></td> <td></td> <td>650 <u>765</u></td> </tr> </tbody> </table>	Spatial Area	Already Built or Committed	Strategic Allocations	Broad Locations / <u>Source</u>	Further Capacity Identified in SHLAA	Allowance For windfall	Total	DA							DA1	13	0		7		20	DA2	855	1085		0		1940	DA3	420 <u>126</u>	300		390 <u>449</u>		850 <u>875</u>	DA4	285 <u>380</u>	615		285 <u>135</u>		1185 <u>1130</u>	DA5	0 <u>10</u>	335		135 <u>170</u>		470 <u>515</u>	DA6	420 <u>90</u>	200		340 <u>235</u>		630 <u>525</u>	DA7	0	700		0		700	DA8	0 <u>52</u>		400 <u>248</u>			400 <u>300</u>	DA Total	1390 <u>1525</u>	3235	400 <u>250</u>	1130 <u>1000</u>		6155 <u>6005</u>	Rest of City	1190		500	1856		3945	a) <u>Built up area</u>	<u>1450</u>	400	<u>390</u>	<u>2147</u>		<u>4130</u>	b) <u>Urban Fringe</u>				<u>1060</u>		<u>1060</u>	Small id. Sites	650 <u>765</u>					650 <u>765</u>	
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		Total	3230 <u>3740</u>	3635	900 <u>640</u>	2985 <u>3945</u>	600 <u>1250</u>	11350 <u>13210</u>		
<p>4.13 Brighton & Hove is a tightly constrained city. In many instances, the boundaries of the South Downs National Park are contiguous with the built up area of the city. As a consequence, the majority (94%) (<u>87%</u>) of new residential development will take place on previously developed land or 'brownfield' sites. The Plan does however make a strategic allocation for the development of land at Toad's Hole Valley to the north of the city which is a large greenfield site falling outside the boundaries of the National Park (<u>See DA7</u>). Development at this location will contribute a significant amount of new housing development for the city and, as part of a mixed use comprehensive development, will secure many other benefits for the city (see DA7). <u>Part B of Policy CP1 also indicates that some sites within the city's wider urban fringe will contribute to housing land supply. Sites will be taken forward for further consideration and detailed assessment as site allocations through Part 2 of the City Plan. The 2014 Urban Fringe Assessment Study will be a material consideration in the determination of any applications for residential development on urban fringe sites that come forward prior to the adoption of Part 2 of the City Plan (see Policy SA4 Urban Fringe).</u></p> <p>4.15 Government <u>National</u> planning <u>policy</u> guidance requires sufficient specific sites and/or broad locations to be identified to meet planned housing targets for at least the first ten years of the plan¹³³. In reality, small 'windfall' site development (as described above) will come forward throughout the plan period and will contribute towards meeting the planned housing requirements for the city and ongoing five year supply requirements. <u>The potential supply from small windfall site development is reflected in the planned housing target for the city (see Part B of Policy CP1).</u> In this way, development from small windfall development activity will supplement housing supply achieved from identified sites and also provide a measure of</p>										

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>contingency should there be an element of non-delivery from some of the large development sites. Given the NPPF requirements, a minimal allowance for development from this source has only been included as part of the city's projected land supply after 2024.</p> <p>Amend footnote 132:</p> <p>¹³²Small site development has accounted for approximately 35% <u>36%</u> of total residential development across the city over the last 10 years.</p> <p>4.16 The housing trajectory is based upon reasonable <u>and realistic</u> assumptions about the deliverability of housing over the plan period. The trajectory illustrates that the rate of housing delivery in the city is expected to increase over the first ten years of the plan period (post-adoption) reflecting anticipated recovery in the economy and financial markets which has severely affected development rates in the early years of the plan period. The trajectory will be updated and reviewed on an annual basis to track delivery progress against planned housing requirements and the requirement to maintain a five year supply of housing land/sites. This will be reported through the council's annual Authority Monitoring Report. The council's Housing Implementation Strategy outlines how housing delivery will be managed over the plan period.</p>	
PM073	CP2 Sustainable Economic Development, page 133, 136-137	<p>Include new criteria between CP2.5 and CP2.6:</p> <p><u>6. Recognise the importance of employment-generating non-B Class uses to the local economy. Appropriate allocations for non-B Class uses will be made through the City Plan Part 2.</u></p> <p>and at paragraph 4.26:</p> <p>4.26 The city contains a number of major employment generators including the two universities and the Royal Sussex County Hospital and the council will work with the higher and further education sector, Sussex University Hospital NHS Trusts and NHS Brighton & Hove to support appropriate expansion (see DA3 Lewes Road Area, DA5 Eastern Road and Edward Street Area and CP18 Healthy City). Other non-traditional employment generators</p>	<p>6 and 4.26: This modification is considered to strengthen the score against the SA objectives 11 and 12 (employment and economic development), however is not considered to change the previous SA findings.</p> <p>(Nb CP2 last assessed at draft Plan Sustainability Appraisal (May 2012))</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>(non-B class uses) in the city include retail and leisure uses. Non-B Class uses are estimated to account for approximately 71% of all jobs in Brighton & Hove. This is expected to remain broadly consistent over the plan period to 2030. Development Area proposals, SA2 Central Brighton, CP4 Retail Provision and CP6 Culture and Tourism set out how the City Plan will address addresses retail, culture, leisure and tourism needs to 2030. Appropriate allocations for employment-generating non-B Class uses will be included in the City Plan part 2.</p>	
PM074	CP2 Planning for Sustainable Economic Development, page 136	<p>Amend last sentence of paragraph 4.23:</p> <p>The council's emerging Brighton & Hove Economic Strategy Refresh¹⁴⁶ will sets clear aspirations for the City that will help to demonstrate how it can move towards becoming a low carbon economy.</p> <p>Amend footnote 146:</p> <p>146Due to be adopted March <u>June</u> 2013.</p>	No impact on SA.
PM075	CP3 Employment Land, pages 138-139 and insert new footnote	<p>Amend CP3:</p> <p>3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:</p> <p>Centenary Industrial Estate English Close Industrial Area, Old Shoreham Road Home Farm Industrial Area Hove Technology Park, St Josephs Close, Old Shoreham Road Moulsecoomb & Fairways Industrial Estate Sussex House (including BT depot) Woodingdean Business Park Hyde Business Park, Bevendean Bell Tower Industrial Estate</p>	<p>Para 3.</p> <p>The inclusion of “waste management facilities” impacts positively on SA objective 22 (reduction of waste) and this is a change from the previous SA.</p> <p>Amend SA accordingly.</p> <p>The amendment of B2 to B8 is considered to be more flexible, and will allow for</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>Hollingbury Industrial Estate Hollingdean Industrial Estate Victoria Road Industrial Estate Newtown Road Industrial Estate</p> <p>The council will support proposals for the upgrade and refurbishment of these estates and premises so that they meet modern standards required by business, are more resource efficient and improve the environment or townscape of the site or premise.</p> <p>Sui generis uses, <u>including waste management facilities</u>, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1-B2 B8 Use Classes¹⁵²; do not harm the continuation of existing uses within those Classes and comply with other City Plan policies <u>and for waste management facilities the Waste and Minerals Plan.</u></p> <p>4. In order to secure good quality modern, flexible employment floorspace the council will allow employment-led (residential and employment) mixed use development on the following employment sites: Franklin Road Industrial Estate School Road, Hove Melbourne Street Industrial Area Portland Road Trading Estate (including EDF and Martello House) Land North of Newtown Road There should be no net loss in employment floorspace: <u>unless this can be justified.</u> <u>Paragraph 4.36 sets out the factors that will be taken into consideration.</u></p> <p>5. <u>Loss of Unallocated sites or premises in, or whose last use was, employment use (Use Classes B1-B8) will not be released to other uses unless only be permitted where the site or premises it can be demonstrated to be both redundant and incapable of meeting the needs of modern alternative employment uses (Use Classes B1-B8).</u></p>	<p>more uses to come forward on industrial estates, as appropriate. This is considered to be positive towards the employment and economic development objectives (11 and 12), however does not change the previous SA findings.</p> <p>Para 4. No impact on SA. The additional text clarifies that there are circumstances where loss can be justified, which was already set out in the Supporting Text. This modification is considered to clarify and confirm what was already in the policy. The criteria set out in the supporting text is considered to be strong enough to ensure loss can be justified.</p> <p>Para 5. No impact on SA . Amendments do not change the meaning of the policy and are considered to provide more clarity.</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		<p>Where release <u>loss</u> is permitted the <u>preference priority</u> for re-use will be for alternative employment generating uses or affordable housing (in accordance with CP20 Affordable Housing).</p> <p>Insert new footnote: ¹⁵² <u>Employment generation as compared with average employment densities as set out in Table 3 of the HCA/Offpat Employment Densities Guide, 2010 or subsequent updates.</u></p>	
PM076	CP3 Employment Land, amendm ents to paragrap hs 4.30 – 4.36, 4.39, pages 140 – 143	<p>Amend the following parts of the following paragraphs:</p> <p>4.30 ... This will be informed by the preparation of an office delivery trajectory setting out a realistic pipeline of supply of The Employment Land Supply Trajectory 2013 indicates the potential delivery of new employment floorspace employment sites over the short, medium and long-term....</p> <p>4.31 In light of the Employment Land Study Review 2012 identifying a qualitative and quantitative need for additional employment land over the plan period it is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace as indicated in Table 5 to meet the council’s priorities regarding high quality job creation and to support its growth potential over the next 20 years, with appropriate flexibility. It is important that the strategic allocations set out in the Development Areas bring forward high quality employment floorspace. The Employment Land Supply Trajectory indicates the need for close monitoring of the office developments identified to come forward in 2014-2019 to ensure they are delivered. However, it is also important to allow for reasonable flexibility, in the short term to promote successful regeneration and enable viable schemes to be delivered. Therefore proposals which bring forward employment floorspace less than proposed on sites identified in Table 5 will be considered, taking into account whether:</p> <ol style="list-style-type: none"> 1. There is demonstrable benefit for early redevelopment and clear commercial and financial viability evidence that the figures in Table 5 are unlikely to be delivered within the next 5 years; 	4.30 & 4.31. The Employment Land Trajectory indicates that the majority of development will occur in the medium term (2019-2024 period). When compared to the annual average delivery rate, the office element in the short term is considered to be equivalent to the average, however the industrial element is much lower. In the medium term, the office element is much higher than the annual average, but again the industrial element is much lower, and in the long term, both office and industrial and lower than the annual average. The results of the Employment Land Trajectory are not considered to impact on the SA previous findings, however the review of the SA

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>2. Allowing a different scale or mix of development will secure particularly strong planning benefits;</p> <p>3. It is appropriate in light of ongoing monitoring <u>of delivery of new employment floorspace against the 2013 Employment Land Supply Trajectory and subsequent updates.</u> regarding the delivery of the overall employment forecast targets and of economic growth.</p> <p>To ensure that this is assessed on a consistent basis a delivery trajectory for employment sites will be prepared to inform the implementation of the policy.</p> <p>4.34 These industrial estates/ premises are also considered suitable for certain “sui generis” uses, that is, those with industrial characteristics which are not included within the Use Classes Order. For example, car breaking, or metal recycling which could potentially harm residential amenity are thus likely to be considered most suited to an industrial estate. <u>With modern design and operation techniques, waste management facilities can increasingly be accommodated in general industrial areas as a B2 use¹⁵⁸.</u></p> <p>Insert new footnote:</p> <p>¹⁵⁸ <u>See Policy WMP 7 of the Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove, adopted February 2013</u></p> <p>4.36 In considering proposals where a net loss of employment floorspace is being proposed the council will take into consideration the following factors:</p> <ul style="list-style-type: none"> - Site constraints (current site coverage and opportunities for more effective and efficient use of the site) - The need for environmental and townscape improvements - Access arrangements (improved access/circulation space). - Safeguarding the amenity of surrounding users and occupiers - The quality of the employment offer in terms of the type of employment and density of jobs. - <u>viability</u> 	<p>in light of other modifications presents the opportunity to include this information within the explanatory text.</p> <p>4.34 – Impacts positively against SA objective 22 (reduction of waste) as identified under MM30.</p> <p>4.36 – the inclusion of the word viability is considered to add flexibility to the policy, should help to bring schemes forward, which is considered to be positive and strengthen the existing positive impact against the employment and economic objectives (11 and 12).</p> <p>Review SA, to allow for updates, however no change in SA scores resulting from these modifications.</p>

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PM077	CP3 Employment Land, Paragraph 4.40 page 143	4.40 Alternative employment generating uses are any uses that generate employment but are not classified as an employment use (uses falling outside the Use Class B1- B8) <u>including educational teaching space and health facilities</u> . This excludes retail or leisure uses unless they comply with the tests of national planning policy.	No impact on SA. Modification for information purposes.																				
PM078	CP4 Retail Provision	<p>Brighton & Hove's hierarchy of shopping centres will be maintained and enhanced by encouraging a range of facilities and uses, consistent with the scale and function of the centre, to meet people's day-to-day needs, whilst preserving the predominance of A1 use classes:</p> <table border="1" data-bbox="421 699 1496 1034"> <thead> <tr> <th data-bbox="421 699 689 778">Centre Definition</th> <th data-bbox="696 699 1205 778">Defined Centres</th> <th data-bbox="1211 699 1496 778">Linked Policies</th> </tr> </thead> <tbody> <tr> <td data-bbox="421 783 689 815">Regional Centre</td> <td data-bbox="696 783 1205 815">Brighton</td> <td data-bbox="1211 783 1496 815">DA1, SA2</td> </tr> <tr> <td data-bbox="421 820 689 884" rowspan="2">Town Centres</td> <td data-bbox="696 820 1205 852">Hove</td> <td data-bbox="1211 820 1496 852"></td> </tr> <tr> <td data-bbox="696 857 1205 888">London Road</td> <td data-bbox="1211 857 1496 888">DA4</td> </tr> <tr> <td data-bbox="421 893 689 1034" rowspan="4">District Centres</td> <td data-bbox="696 893 1205 925">St James's Street</td> <td data-bbox="1211 893 1496 925"></td> </tr> <tr> <td data-bbox="696 930 1205 962">Lewes Road</td> <td data-bbox="1211 930 1496 962">DA3</td> </tr> <tr> <td data-bbox="696 967 1205 999">Boundary Road/Station Road</td> <td data-bbox="1211 967 1496 999">DAB</td> </tr> <tr> <td data-bbox="696 1003 1205 1035">Brighton Marina</td> <td data-bbox="1211 1003 1496 1035">DA2</td> </tr> </tbody> </table>	Centre Definition	Defined Centres	Linked Policies	Regional Centre	Brighton	DA1, SA2	Town Centres	Hove		London Road	DA4	District Centres	St James's Street		Lewes Road	DA3	Boundary Road/Station Road	DAB	Brighton Marina	DA2	There may be minor adverse local impacts at Brighton Marina resulting from this modification, particularly relating to employment (ob. 11), economic development (ob. 12) and the access to services (ob. 21) objectives. Removal of the District Centre status could result in an unbalanced mix of A1 and non A1 uses. It will mean that the sequential test for out of town shopping proposals would no longer take into consideration the Marina as a town centre location risking out of town retail developments in the east of the city. An impact assessment for larger proposals would also not be required to look at the impact of the proposal on the Marina. However these are
Centre Definition	Defined Centres	Linked Policies																					
Regional Centre	Brighton	DA1, SA2																					
Town Centres	Hove																						
	London Road	DA4																					
District Centres	St James's Street																						
	Lewes Road	DA3																					
	Boundary Road/Station Road	DAB																					
	Brighton Marina	DA2																					

Ref	Policy/ Paragrap h	Proposed Modification			Summary of Sustainability Implications	
		Local Centres	Mill Lane, Portslade Portland Road, Hove 'The Grenadier' , Hangleton Road Richardson Road, Hove Eldred Avenue ,Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk	SA6 (all centres)		considered to be local in nature and do not significantly change the previous SA findings against these three objectives when set in the wider context of the policy, which overall still maintains a strong approach to the protection of retail uses in designated centres having significantly positive impacts for employment, economic development and accessibility. No further update to SA required.
PM079	Policy CP4 Retail Provision Page 145	Applications will be required to complete an impact assessment at a locally set threshold of 1,000 sqm (gross) (net) floorspace or more.			No impact on SA.	
PM080	CP4 Retail Provision, page 146	Amend wording below Table 6 Estimated Retail Need Retail Study Update 2011: Capacity identified 2011-2030 (Comparison Floorspace Based on improved market share from 60.9% to 70%)			No impact on SA.	
PM081	CP4 Retail Provision, page 146	4.44 The Brighton & Hove Retail Study Update (2011) ¹⁶⁰ has reviewed the vitality and viability of each of the shopping centres. The Study does not recommend that any new centres need to be designated but recommends that the District Centre designation for Brighton Marina should be removed. The Council's preferred approach for Brighton Marina is to maintain its designation as a District Centre <u>enhance the choice and performance of retail activity through the encouragement of mixed retail activity and improvements to the public</u>			Removal of the District Centre status could result in an unbalanced mix of A1 and non A1 uses. This supporting text confirms that there will policy requirements relating	

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p><u>realm</u>, and to continue to address the development and future uses at this location using site specific policy DA2. <u>A detailed policy regarding the appropriate type and mix of A1 and non A1 uses in the Marina will be set out in Part 2 of the City Plan.</u></p>	<p>to the and mix of A1 and non A1 uses for the Marina, and should therefore avoid any indirect adverse impacts in the Marina area.</p> <p>No SA required.</p>
PM082	CP6 Visitor Accommodation, Paragraph 4.58, Page 153	<p>The city has a significant stock of hotel and guest accommodation; a total of 160 hotels and guest accommodation predominantly located in central Brighton and along the seafront. The council undertook a capacity and needs analysis of hotel bedspaces<u>rooms</u> in the city to understand the future capacity of the city to absorb new hotel accommodation (2007 Hotel Futures Study). Since the study was completed 3 new hotels have come into operation (Jury's Inn, MyHotel and Royal York hotel) adding 365 bedspaces<u>rooms</u>. Furthermore there is the potential for an additional 372 bedspaces<u>rooms</u> through recent outstanding planning commitments¹⁷⁵.</p>	<p>No impact on SA. Modifications are editorial in nature.</p>
PM083	CP6 Visitor Accommodation, Paragraph 4.64, p. 154	<p>4.64 The central Brighton seafront and streets and squares running immediately off it account for the majority of the city's current supply of hotel and guest accommodation. There is relatively little accommodation outside the city centre. Hotels and guesthouses are more widely spread in Hove, with no concentrations of establishments. The Hotel Core Zone shown on the proposals<u>policies</u> map is focussed around the main accommodation clusters and drivers of accommodation demand. However...</p>	<p>No impact on SA. Modifications are editorial in nature.</p>
PM084	CP7 Infrastructure and Developer Contributions page 157	<p>Insert in to supporting text 4.73 after 2nd sentence:</p> <p>...to support the needs of new development. <u>The timely connection to provision of utilities including water, wastewater infrastructure and sewerage systems will be required by developer's liasing directly with service/utility providers.</u> Priorities will also derive...</p>	<p>This modification will have positive implications for objective 7 (water pollution), however is not considered to alter the previous SA score or findings. (NB CP7 last assessed at draft City Plan stage (May 2012).</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications																																						
PM085	CP8 Sustainable Buildings, p. 160	<p>Amend table set out under CP8.1:</p> <p>1. All development will be required to achieve the minimum standard as set out below or equivalent standards from a quality assured scheme;</p> <table border="1" data-bbox="465 448 1518 1050"> <thead> <tr> <th rowspan="3"></th> <th colspan="4">Development size</th> </tr> <tr> <th colspan="2">2013-2016</th> <th>Post 2016</th> <th>Post 2019</th> </tr> <tr> <th>Non-major</th> <th>Major and Greenfield</th> <th>All</th> <th>All</th> </tr> </thead> <tbody> <tr> <td>NEW BUILD</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Residential¹ Code for Sustainable Homes</td> <td colspan="2">Level 4 Level-5</td> <td colspan="2">Level 5 Level-6</td> </tr> <tr> <td>Non-residential BREEAM</td> <td>Very Good</td> <td colspan="2">Excellent</td> <td>Outstanding</td> </tr> <tr> <td>CONVERSIONS</td> <td colspan="4">Non-major (3-9 units) and Major</td> </tr> <tr> <td>Residential</td> <td colspan="4">BREEAM Very good</td> </tr> </tbody> </table> <p>Standards may be updated in other DPD documents and/or a review of this policy.</p> <p>New footnote: ¹ <u>Timescales for residential standards are subject to the bringing into place of the Government's Zero Carbon Policy.</u></p>		Development size				2013-2016		Post 2016	Post 2019	Non-major	Major and Greenfield	All	All	NEW BUILD					Residential¹ Code for Sustainable Homes	Level 4 Level-5		Level 5 Level-6		Non-residential BREEAM	Very Good	Excellent		Outstanding	CONVERSIONS	Non-major (3-9 units) and Major				Residential	BREEAM Very good				<p>There is now no differentiation between the standards required for residential non-major and major/Greenfield in the 2013-2016 period; nor between the residential development in 2016 and 2019. In addition, the standard of CSH required in all timescales has been reduced. The changes could potentially impact upon SA objectives 8, 18 and 20 (water minimisation, energy consumption and achieving high level CHS/BREEAM). The changes could potentially improve viability and have more positive impacts for the housing objective (5). Update SA accordingly.</p>
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PM086	CP8 Sustainable	<p>Amend criterion k in addition to MM33 to add reference to protecting groundwater sources:</p> <p>Reduces air, land and water pollution and safeguards water supplies if development</p>	<p>This modification strengthens the policy against SA objective 7 (minimise risk of</p>																																						

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
	Buildings, part 2k. page 161	<u>is within groundwater Source Protection Zones;</u>	pollution to water). This additional requirement is considered to increase the previous positive score from positive to significantly positive against SA objective 7. Amend SA accordingly.
PM087	CP8	4.77 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings ⁵ . Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and carbon neutral development whilst delivering homes and jobs through development is challenging. The combination of standards with provisions for viability assessments will help address this challenge. This will provide the flexibility needed to ensure the right balance between the economic, environmental and social objectives of the City Plan. The standards set out in this policy are commensurate with the scope of this challenge. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city ¹⁸⁵ .	No impact on SA.
PM088	CP8 Sustainable Buildings, Footnote 185, Page 162	Amend last sentence: At present, the bulk of Brighton & Hove's untreated waste is disposed to landfill <u>The adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan identifies a need for additional waste recycling and recovery capacity to support further increases in the diversion of waste from landfill.</u>	No impact on SA.
PM089	CP8	4.83 The Building Research Establishment Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes (CSH) are widely recognised, accredited, independent	No impact on SA.

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>methods for assessing environmental performance of non-residential and residential buildings, respectively. These tools will be used to support policy decision making because they cover a wide range of sustainability issues within a simplified score that provides flexibility for developers in meeting standards set in this policy. Successors to these tools and/or equivalent standards by nationally recognised certification bodies may also be accepted¹⁹⁰. <u>Any changes to nationally described standards and or revised Building Regulations will be addressed through Part 2 of the City Plan or a review of this Policy.</u></p> <p>4.87 More is asked of larger, new build and greenfield types of development as these tend to benefit from economies of scale and easier, cheaper ways in which sustainable design and construction features can be designed in. A growing number of flagship schemes in the UK¹⁹¹ and in Brighton & Hove¹⁹² have demonstrated the viability of such developments. In order to provide clarity and flexibility for developers...</p> <p>Delete footnotes 191 and 192:</p> <p>¹⁹¹See Homes and Communities Agency's Carbon Challenge website.</p> <p>¹⁹²A number of high standard developments have already been achieved under the 2005 adopted Local Plan policy SU2.</p>	
PM090	CP9	<p>A. 2. c. Ensuring that all new, major development schemes submit a Transport Assessment to identify the likely effects of the demand for travel they create and include measures to mitigate their impacts by reducing car use, <u>implementing agreed travel plans</u> and making appropriate contributions towards sustainable transport measures (see CP7 Infrastructure and Developer Contributions).</p>	<p>This point strengthens the requirements, but does not change the previous findings of the SA.</p> <p>No change.</p>
PM091	CP9 Sustainable Transport , page	<p>B. 1. Bus, Coaches and Taxis Implement strategic bus network investment including priority lanes on key routes into and across the city. Priority routes are:</p> <ul style="list-style-type: none"> • Lewes Road (A270) • Edward Street and Eastern Road 	<p>This modification adds the Valley Gardens area to the list of priority routes, however is not considered to significantly change the</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
	167	<ul style="list-style-type: none"> • A259 Seafront serving Brighton Marina, Brighton Centre & Churchill Square and Shoreham Harbour Development areas. • London Road • <u>Valley Gardens</u> 	findings of the previous SA assessment. No further update to SA required.
PM092	CP9 Sustainable Transport, page 168	<p>B. 4. Walking and Cycling Improve the public realm in key areas, and the routes leading to them, to encourage and enable walking (including wheelchair access) and cycling. Measures will be undertaken in a number of areas including the following:</p> <ul style="list-style-type: none"> • Valley Gardens • <u>Brighton Station Gateway, Queens Road and West Street</u> • Lewes Road • London Road • Edward Street and Eastern Road • Old Shoreham Road • A259 Seafront • Seven Dials • Hove Station • Pool Valley • Local shopping areas 	This modification adds more detail to the Brighton Station Gateway area text, however is not considered to significantly change the findings of the previous SA assessment. No further update to SA required.
PM093	CP9 Sustainable Transport, Page 168	<p>B. 6. Parking Co-ordinate the provision of parking and traffic management measures across the city through an integrated approach to car parking charges, car park improvements (including signing and information), controlled parking zones and ensure that the capacity of public car parks <u>used by the public</u> are is not increased in central areas.</p>	No impact on SA. Modification is editorial in nature.
PM094	CP10 Biodiversity, page 177	4.132 The South Downs Way Ahead Nature Improvement Area (NIA) includes all of the city's Green Network and much of the surrounding downland. The boundary of the NIA/Green Network is shown on the proposals <u>policies</u> map.	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
PM095	CP11 Managing Flood Risk, page 181	<p>The Council has a developing new role as Lead Local Flood Authority with a responsibility <u>for surface and groundwater flooding, SuDS approval and other responsibilities derived from the Flood and Water Management Act 2010 and is as a source of information and technical assistance.</u></p> <p>Amend monitoring target in Annex 1 Implementation & Monitoring Plan to include Council's decisions on planning applications to reflect future changes to roles and responsibilities for flooding issues</p>	No impact on SA. Modification is for information purposes only.
PM096	CP12 Urban Design, footnote 205, page 185	²⁰⁵ The anticipated adoption date for the Urban Design Framework is <u>January 2017</u> 2013 .	No impact on SA.
PM097	CP14 Housing Density, Paragrap h 4.159, Page 190	<p>Delete sentence:</p> <p>The South East Plan sets an overall regional target of 40 dph and states that there are significant opportunities to provide quality housing development in excess of 50 dph in many urban and suburban areas.</p>	No impact on SA. Modification is editorial in nature.
PM098	CP16 Open Space, Page 194	<p>Amend the following criteria in Policy CP16:</p> <p>1. The council will require the retention of and seek better, more effective and appropriate use of all existing open space, as shown on the <u>proposals policies</u> map, having regard to the Open Space, Sports and Recreation Study and the Open Space Update Study²¹².</p>	No impact on SA.
PM099	CP16 Open	Planning permission resulting in the loss of open space, including the beach, will not be granted unless:	The proposed amendments (1e) suggests that sites may

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
	Space, Page 194	<p>...</p> <p><u>e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p>	<p>come forward prior to Site Allocations stage and confirms that the Urban Fringe Assessment will be a material consideration. This indicates that housing will be delivered on sites that are existing open space. This has positive impacts for the housing objective but has the potential for various adverse impacts on environmental and potentially social objectives.</p> <p>Re-assess policy to ascertain impacts.</p>
PM100	CP16 Open Space, Page 195	<p>2. b) Developments, especially those located in an area with open space deficiencies, will be expected to help improve sustainable means of access to open space and facilitate appropriate links to the city's open space framework (which comprises the open spaces shown on the proposals policies map, the Nature Improvement Area, beaches, the countryside and new open space allocations and links).</p> <p>...</p> <p>2. d) The community use of private and schools open spaces will be sought when considering proposals affecting these sites including the temporary use of redundant or undeveloped sites. All open space proposals will be expected to have an agreed funded maintenance plan for the space. The council will seek to allocate new open space in the City Plan Part 2.</p>	<p>2b) No impact on SA. 2d) No impact on SA.</p> <p>2f) No impact on SA.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>...</p> <p>2. f) Seek proactive and appropriate management of open spaces including the enforcement of by-laws and seek the enhancement and improvement of open spaces and features. <u>All open space proposals will be expected to have an agreed funded maintenance plan for the space.</u> Lighting proposals, including floodlighting, will be required to minimise light pollution, help reduce crime and not cause significant harm.</p>	
PM101	CP16 Open Space, p. 196-197	<p>Amend paragraphs 4.174 and 4.175:</p> <p>4.174 Due to the city's housing requirements a <u>A</u> review of the capacity and need for open space was required and the findings of the Open Space, Sport and Recreation Study 2008 were further assessed through the Open Space Study Update 2011. The Update Study endorsed the local open space standards and the approach taken in the 2008 study. It devised a scoring system to assess open space which was applied to private open spaces and used to inform the 2010 Strategic Housing Land Availability Assessment. However the factors that produce a low open space offer (a combined assessment of 'quantity', 'accessibility' and 'quality' including potential) also limit a site's suitability for housing and no additional open space sites were identified <u>through the study</u> as suitable for housing. <u>However through the 2014 Urban Fringe Site Assessment Study some of the open spaces within the city's urban fringe has been identified as having some potential to help meet the city's housing requirements (see Policies SA4 and CP1). Unlike other urban open spaces the net loss of some open space in the urban fringe can more readily be mitigated through the provision of new publicly accessible space, enhancements to existing space or by alternative provision within the National Park or compensated for by the National Park's open space offer.</u></p> <p>4.175 When the open space standards are applied, a significant increase in open space will be required by 2030 (an additional 237 <u>293</u> hectares should be created <u>provided</u> when ONS population projections are applied, which however is reduced to 202 hectares when the City Plan housing target of 13,200 is taken into account <u>the generated demand equates to</u></p>	<p>The amendments bring more certainty that residential development is likely to take place in this location and that loss of open space will be necessary for this to occur. This could impact upon a range of environmental objectives as well as resulting in a net loss of open space, impacting upon Objective 3. The amendments indicate that only the loss of some open space can be mitigated through alternative provision/enhancements.</p> <p>Revise SA.</p>

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>approximately 167 hectares²¹⁴). It is therefore important new developments seek to provide the open space requirements generated respectively. However due to the city's physical constraints, between the sea and the South Downs National Park, it is recognised that the future open space requirements are unlikely to be met in full. To compensate, more intensive use of existing open space will be needed in an attempt to maintain current quality of life including the opening up of school grounds to the community/public and an expectation that owners should endeavour to enable better open space use of under-used private spaces. There will also be a need to better connect green spaces together to improve accessibility and to improve access for quiet recreation to the South Downs National Park.</p> <p>Amend footnote 214:</p> <p>²¹⁴ONS stands for Office for National Statistics. <u>The 2030 population figure applied is 310,900 based on ONS 2012-based Subnational Population Projections. The indicative generated demand of 13,200 residential units is calculated using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in open space arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. These figures apply a population figure of 302,806 and 294,072 respectively which are based on information in the ONS 2010-based Sub-National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) – Initial release of 2011 Census Data. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).</u></p>	
PM102	CP17 Sports Provision, p. 200, 201	<p>... Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:</p> <p>...</p> <p>Add at the end of Section 2:</p> <p><u>The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p> <p>Standard for Indoor and Outdoor Sports Facilities</p>	<p>Policy Changes:</p> <p>The proposed amendment confirms that the UFA will be a material consideration prior to the adoption of Part 2 City Plan.</p> <p>According to the findings of the Urban Fringe Assessment Study, no sites, or parts of sites that are currently in use</p>

Ref	Policy/ Paragraph	Proposed Modification				Summary of Sustainability Implications
		Indoor Sports				<p>as outdoor sports have been found as having potential for residential development. The one site that has been identified as having potential is no longer in current use (Ladies Mile Playing Fields). This change is therefore considered to have negligible effect on outdoor sports provision citywide, although this loss could become more significant in the longer term. This change has a positive implications for housing which is a change from the previous SA position.</p> <p>Supporting Text changes: no impact on SA – for information purposes only.</p> <p>Amend SA.</p>
		Quantity (indoor sport)				
		<p>Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.</p>	<p>The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice rink (See also the Sports Facility Plan for further recommendations).</p>			
		Accessibility (indoor sport)				
		Standards to comply with national best practice.				
		Quality (indoor sport)				
		All facilities should be built or provided in accordance with national best practice				
		Outdoor Sports				
		Quantity (outdoor sport)				
		Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ²¹⁵	
		Approx 118.5 Hectares	0.47	0.47	Approx 20 to 23 <u>15.5 to 28</u> hectares	
		Accessibility (outdoor sport)				
		20 minute walk time (960 metres)				
		Quality (outdoor sport)				

Ref	Policy/ Paragraph	Proposed Modification	Summary of Sustainability Implications
		<p>Clean, litter-free sports facilities should be provided with appropriate, well drained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.</p> <p>Standard for Indoor and Outdoor Sports Facilities</p> <p>All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.</p> <p>Amend footnote 215:</p> <p>²¹⁵<u>Applying a 2030 population figure of 310,900, based on ONS 2012-based Subnational Population Projections, an additional 27.6 hectares of outdoor sport space will be required. However, when the indicative generated demand of the City Plan's housing target of 13,200 residential units is calculated (using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms) an additional 15.5 hectares is required. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in outdoor sport arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. ONS stands for Office for National Statistics. Based on information in the Office for National Statistics 2010-based Sub National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) - initial release of 2011 Census Data. Applying the respective 2030 projection figure of 299,777 an additional 22.9 hectares will be required however on the assumption that the City Plan housing targets will restrict the growth in population to 292,886 this will reduce the additional outdoor sport requirement to 19.66 hectares. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).</u></p>	
PM103	CP18	<p>3. Require larger developments to demonstrate how they <u>minimise negative impacts</u> and maximise positive impacts on health within the development or in adjoining areas (where the benefits of new development can be maximised).</p>	<p>NB: Amendment came from HEQIA and SA recommendation.</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
PM104	CP18, Page 206	<p>Insert footnote definition of Lifetime Neighbourhood principles related to part 4 of policy:</p> <p><u>The CLG (Lifetime Neighbourhoods - December 2011) has recognised the importance of neighbourhood as a determinant of well-being in later life and its crucial role in supporting older people's independence. The main components that make up a lifetime neighbourhood includes: supporting residents to develop lifetime neighbourhoods – especially resident empowerment; access, services and amenities, built and natural environments, social networks/well-being and housing.</u></p>	No impact on SA.
PM105	CP18 Healthy City Paragrap h 4.197	<p>Add after last sentence:</p> <p><u>Poor air quality can cause serious health problems and reduces the quality of life and life expectancy. Development proposals will be expected to protect and improve local air quality and should be appropriately and sensitively designed to mitigate negative impacts on air quality.</u></p>	<p>This main modification is considered to strengthen the policy requirements, however is not considered to change the findings of the previous SA assessment (at draft Plan stage May 2012). No further update required.</p>
PM106	Policy CP19 Housing Mix, page 209, 210	<p>Add new criterion a. iii) to the policy:</p> <p>iii) <u>introduce dwelling space standards in Part 2 of the plan to secure quality and sustainability in new residential development.</u></p> <p>Insert new penultimate sentence within paragraph 4.202:</p> <p><u>Part 2 of the plan will introduce minimum dwelling space standards, similar to those of the GLA or compatible with those emerging from the government's 2013 Housing Standards Review.</u></p>	<p>This modification is considered to strengthen the policy against the housing (5) and health (13) objectives. However these were already considered to be significantly positive and therefore no further change is required. (Nb CP19 last assessed at draft city plan stage (May 2012)</p>
PM107	CP21, Page 217, 218	<p>i) Purpose Built Student Accommodation</p> <p><u>A. 6. Schemes should demonstrate that they have entered into a formal agreement with the support of one of the city's two Universities or other existing educational</u></p>	<p>A6 No impact on SA.</p> <p>A7 The modification strengthens the SA findings</p>

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
		<p>establishments within Brighton & Hove.</p> <p>A. 7. Permanent purpose built student Accommodation will not be supported on sites <u>allocated for housing or with either an extant planning permission for residential development or sites identified as potential housing sites.</u></p> <p>ii) Houses in Multiple Occupation (HMO's)</p> <p>In order to support mixed and balanced communities and to ensure that a range of housing needs continue to be accommodated throughout the city, applications for <u>new build</u>, the change of use to a Class C4 (Houses in multiple occupation) use, a mixed C3/C4 use or to a sui generis House in Multiple Occupation use (more than six people sharing) will not be permitted where:</p> <ul style="list-style-type: none"> • More than 10 per cent of dwellings within a radius of 50 metres of the application site are already in use as Class C4, mixed C3/C4 or other types of HMO in a sui generis use. 	<p>against SA objective 5 (housing) as ensures protection of allocated sites. However, the modification does not alter the findings of the previous SA assessment against this objective, which were already significantly positive.</p> <p>(ii) The modification strengthens the policy further against a range of objectives, in that it should help to prevent any further studentification in certain areas, however does not change the findings of the previous SA assessment.</p>
PM108	CP21, Paragraph 4.225, Page 219	<p>The city's educational establishments and their students make an important contribution to the economic and cultural life of the city. There are approximately <u>35,200</u> 37,000 students at the Universities of Brighton and Sussex, which includes <u>4,000</u> 5,200 <u>international students</u> from non EU countries. 450 countries</p> <p>Insert new footnote source: <u>HESA 2011/12</u></p>	No impact on SA. Modifications are editorial in nature.
PM109	CP21, Paragraph 4.234, page 220	In assessing planning applications for new Houses in Multiple Occupation, a circle with a radius of 50 metres will be drawn from the centre point of the application site's highway frontage <u>front curtilage boundary.</u>	No impact on SA.
PM110	CP22,	Additional wording at end of footnote:	No impact on SA.

Ref	Policy/ Paragrap h	Proposed Modification	Summary of Sustainability Implications
	Footnote 254, page 223	' <u>A summary of the partial review process is provided in the paper 'Joint Evidence Paper – Provision for Gypsies and Travellers in East Sussex' April 2011 produced by ESCC, East Sussex District and BHCC officers.'</u>	

PM111-PM116 relate to modifications to Annexes and have not been assessed by the Sustainability Appraisal.

Appendix E Re-assessment of policies resulting in significant changes

This Appendix contains the re-appraisal of the following:

- Spatial Strategy
- DA1 Brighton Centre & Churchill Square
- DA2 Brighton Marina, Gas Works and Black Rock
- DA3 Lewes Road Area
- DA4 New England Quarter and London Road Area
- DA5 Eastern Road and Edward Street
- DA6 Hove Station Area
- DA7 Toads Hole Valley
- DA8 Shoreham Harbour
- SA1 The Seafront
- SA2 Central Brighton
- SA4 The Urban Fringe
- SA5 The Setting of the South Downs National Park
- CP1 Housing Delivery
- CP3 Employment Land
- CP8 Sustainable Buildings
- CP16 Open Space
- CP17 Sports and Recreation

The proposed main modifications to any other policy were not found to significantly change the SA findings as set out in the Sustainability Appraisal of the Submission City Plan, February 2013.

For clarity, changes to explanatory text and scores in these assessments resulting from the main modifications have been highlighted in **bold** text.

Key

Strong Positive Impact	++
Positive impact	+
No/negligible impact	0 or blank
Adverse impact	-
Strong adverse impact	--
Uncertain impact	?
Mixed impact	-/+

Scores: based on worst-case scenario – e.g. pre-mitigation

Revised Spatial Strategy

Nb. This was not assessed as an individual policy at the Submission stage.

SA Objective	Summary of effects	Short	Medium	Long term
1) Protect and enhance biodiversity	Development within the existing built up area will involve development on urban brownfield sites, some of which may have some biodiversity value, or on sites in close proximity to sensitive environments. Development on urban fringe sites may also have some adverse impacts on existing biodiversity. The significance of the impacts would need to be assessed as part of a planning application. It is likely that the adverse impacts could be overcome with mitigation as suggested by the urban fringe assessment, which directs development to sites with lower biodiversity value. The Habitats Regulations Assessment Screening 2014 indicates that there would not be any adverse effect on the integrity of a European site from the proposed development levels of the City Plan Part 1, with proposed modifications.	-	-	-
2) Improve air quality	Majority of development directed to the built up area where access to existing modes of sustainable transport are good. This may positively impact upon car ownership and transport choice. However some of the urban area is located within the AQMA 2013, within which air quality has shown little improvement over the last 10 years and the amount of cars owned locally is likely to increase with the delivery of 13,200 new homes, in addition to increasing levels of other development. The scale of development anticipated at Toads Hole Valley may have slight localised air quality impacts, and require more car journeys to be made due to its location, although air quality in this location is currently good. Delivery of an additional 1,060 housing units across the urban fringe may also have slight localised impacts, however are unlikely to be significant as air quality in these locations is currently good.	-	--	--
3) Maintain local distinctiveness	Development within the built up area has potential for adverse impact on heritage assets and their settings, although could improve areas where townscape and streetscape is currently poor. Development within the built up area will increase the pressure on the existing open space resource and it is considered unlikely that the increasing open space needs of the increased population will be met. Development on urban fringe sites could result in a net loss or a net gain in publically accessible open space. This depends on their current ownership, whether they currently form part of the assessed open space standards, and whether the development will incorporate new open space provision. Overall there is likely to be a total net loss of open space in the urban fringe.	--/+	--/+	--/+
4) Protect South Downs	Sites on the urban fringe have been identified as suitable for development. Some of these sites act as a buffer between the built up area and the South Downs National	-	-	-

SA Objective	Summary of effects	Short	Medium	Long term
	Park and may impact upon the landscape character of the SDNP although the results of the UFA suggests these can be mitigated against, or have included only sites where impacts are not considered to be adverse. Site within the built up area can also adversely impact upon the SDNP, or of views of or from the Downs.			
5) Provide decent, affordable housing	The Strategy will result in delivery of housing and is therefore considered to be positive towards this objective. The option will result in affordable housing and types of housing that are known to be required locally, e.g. potential for family type housing in the urban fringe location. However, the OAN has been assessed in the Sussex Coastal Assessment 2014 as a range falling between 18,000 to 24,000. Delivery of 13,230 homes is equivalent to 55% of the upper end and 73% of the lower end of the requirement. A lack of housing supply can result in various adverse impacts such as over-crowding, increasing housing in-affordability, reduced competition in the housing market (e.g. keeps rental prices high), and reduced social mobility (e.g. young people living at home for longer and older people unable to downsize). Overall, the impacts are considered to be mixed.	-/+	-/+	-/+
6) Reduce amount of car journeys	Majority of development directed to the built up area where access to existing modes of sustainable transport are good. This may positively impact upon car ownership and transport choice. However the amount of cars owned locally is likely to increase with 13,200 new homes, in addition to increasing levels of other development. The scale of development anticipated at Toads Hole Valley likely to have some local transport related impacts and require more car journeys or result in higher than average car ownership levels due to its location. Delivery of 1,060 housing units across the urban fringe may also have slight localised transport impacts and may result in a higher than average car ownership levels due to their location. The Transport Assessment Update suggests that mitigation and intervention will be required throughout the city to ensure the road network continues to operate, however that the morning peak time in particular will see an increase in trips and traffic congestion, despite mitigation.	-	--	--
7) Minimise risk of pollution to water	Increased urbanisation throughout the city could increase the risk of surface water flooding, with many areas of the city assessed through the SFRA as having some element of surface water flood risk. Currently the Water Framework Directive status of the aquifer is poor, and development throughout the city could harm any improvement to this status. In addition, many sites within the city fall within either a zone 1 inner, zone 2 outer or zone 3 catchment groundwater source protection zone. Open space performs a natural function in respect of absorption of water. Loss of any type of open space on the urban fringe may increase the risk of surface water flooding elsewhere. Development on the urban fringe could also impact on the recharge of the aquifer which underlays the city and is an important source of public water supply.	-	--	--

SA Objective	Summary of effects	Short	Medium	Long term
8) Minimise use of water	The strategy will result in an increase in local population, which will result in an increase in water consumption. The greater the population, the greater consumption will be. It is acknowledged that the standards applicable to new residential development will ensure that water consumption is minimised, however it is understood that there are no longer any additional requirements to achieve higher standards on Greenfield sites.	-	-	--
9) Promote development of contaminated land	Development within the urban area has potential for remediation of contaminated land and will depend on the site developed. Although there are sites within the urban fringe that are known to be significantly contaminated due to former uses (e.g. Sheepcote Valley) it is considered unlikely that these will be brought for development prior to other sites mainly due to the costs involved with remediation and the impact this will have on viability.	?	?	+?
10) Manage coastal defences	Both options will result in delivery of housing in coastal locations (DA2 and DA8) that have been assessed by the SFRA as high risk of coastal flooding (Level 3a)	-	-	-
11) Employment: balance needs of tourists, residents and businesses	Delivery of housing and house-building is strongly linked to economic growth. This option will result in temporary construction-related jobs and permanent service-sector jobs to meet the needs of an increased population, as well as additional local workers to help meet the forecasts in economic growth. Strategy also sets out that employment and retail will be delivered across the city, and also directed to the main development areas.	+	++	++
12) Support economic development	See objective 11.	+	++	++
13) Improve health	The strategy will deliver housing, including affordable housing and will make a significant contribution towards meeting the city's housing requirements. This strategy is likely to deliver greater levels of family-type housing, in the urban fringe location. This strategy does not meeting the OAN and could therefore still exacerbate the issues such as over crowding and inaffordability. The Strategy will result in deliver of employment opportunities, which is also a determinant of health. This strategy will result in loss of open space on the urban fringe, some of which is accessed for recreation purposes which has strong links to health. The loss of this open space may have some localised impacts on the health of adjacent communities, as well as potentially reducing the ability to meet the accessibility standards for certain types of open space (particularly Natural/Semi-Natural) in the west of the city in particular. However, it is recognised the land area with development potential across the urban fringe equates to 8% of the urban fringe total area, with the vast majority remaining as different types of open space.	-/+	-/+	-/+

SA Objective	Summary of effects	Short	Medium	Long term
14) Integrate health and community safety	No direct impact.			
15) Narrow the gap between deprived areas and rest of the city	<p>The strategy will result in the delivery of housing, which will have positive impacts on reducing housing based deprivation and will create job opportunities, both having positive impacts on deprivation, although will depend on take up by existing deprived communities.</p> <p>The strategy results in a 7.5% loss of open space situated on the urban fringe. Access to open space has been linked to reducing health inequalities, with access to open space benefiting all communities but benefitting deprived communities the most (Natural England 2012). It is these communities where long term health conditions such as obesity, heart disease and diabetes are more prevalent, particularly in those that have no or limited access to green open space. In some cases, these urban fringe sites are adjacent to some of the city's deprived communities and in these cases loss of this open space could result in a widening of health inequalities, although it is recognised that with improved access, open space within the SNDP could be utilised readily by these communities. The impacts are therefore considered to be mixed.</p>	-/+?	-/+?	-/+?
16) Engage local communities	The strategy will provide opportunities to engage with local communities. Additional engagement would be likely resulting from housing development in the urban fringe location.	++	++	++
17) Make the best of previously developed land	<p>The strategy directs the majority of development to the built up area and therefore it can be assumed that the best use of previously developed land will be made in this location.</p> <p>It is understood that the need for development is due to the need to meet the increasing housing need, and is in addition to and not instead of developing within the built up area, and therefore this does not mean that the best use of land within the built up area has not been made.</p>	+	+	+
18) Sustainable energy	The strategy will result in new development, will result in an increase in local population, which will result in an increase in energy consumption. The greater the population, the greater consumption will be. It is acknowledged that the standards applicable to new residential development will ensure that energy consumption is minimised, however it is understood that there are no longer any additional requirements to achieve higher standards on Greenfield sites.	-	-	-
19) Taking account of the changing climate	The strategy involves development along the coastal frontage in areas at higher risk of coastal flooding, which is likely to increase as a result of climate change. It also involves the loss of Greenfield sites on the urban fringe. Open space will play an increasingly important role in adaptation to climate change, with open space helping to absorb water, therefore reducing flood risk but also maintaining water supply, and also help to maintain urban temperatures and have been documented to reduce	-	--	--

SA Objective	Summary of effects	Short	Medium	Long term
	urban temperatures by 1-2 degrees Celsius.			
20) Meet BREEAM / Code for Sustainable Homes	No direct impact on this objective.			
21) Increasing accessibility	<p>Development within the built up area will have good access to existing employment opportunities, as well as other services and facilities as described under Option 1. 85% of the housing is located within the built up area.</p> <p>Loss of open space within the urban fringe will reduce access to open space. In addition, housing distributed throughout the urban fringe may have limited access to services and a wide distribution on small sites may not result in associated local services.</p>	-/++	-/++	-/++
22) Reduction of waste	The policy will result in an increase of waste, associated with the increased population.	-	-	--

Policy DA1: Brighton Centre and Churchill Square

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impact. In general, the development area is currently lacking in biodiversity therefore the issue that development could have a negative impact on existing biodiversity is not considered to be significant. Further development provides opportunities to incorporate features to enhance biodiversity, as well as provide links to join areas of biodiversity together and create links to the green network. The specific references within the policy to ensuring development incorporates biodiversity features should ensure that the impact against this objective is positive. In addition, CP10 sets out the requirements in terms of provision of biodiversity features in new development.	+	+	+
2) Improve air quality	Direct impact. The Development Area is situated within the AQMA 2013 , with several monitoring sites within the Development Area exceeding the Government's Air Quality Objective for Nitrogen Dioxide and some of the worst locations in the city. Improving air quality throughout the area is one of the local priorities included in the policy and new developments are now required to take account impacts on air quality through improvements or mitigation . In addition, the policy also contains other local priorities which aim to minimise car journeys through ensuring public and sustainable transport serve new development. These priorities may help to reduce journeys made by car to the area which would have a positive impact on air quality. However, car journeys to this central Brighton area are already high, with the area likely to be one of the main destinations for visitors arriving by car, regardless of whether they are accessing Churchill Square or the conference facilities. An improved conference centre may cause an increase in number of journeys made by car and it is likely that an increase in retail floorspace will cause an increase in journeys to the vicinity, as 20,000sqm is approximately equivalent to an additional floor, and this is understood to be a minimum requirement . Congestion is already a problem along this central area of the seafront, exacerbated by cars queuing for Churchill Square area car-parks, which is a contributing factor to poor local air quality. Movements by freight are also high in the city centre, and the SA notes the reference in the supporting text regarding re-routing freight, which should bring about some positive impacts, however overall the impact is still considered to be negative. The cross-cutting policy for sustainable transport (CP9) should help to mitigate against the anticipated negative impacts of this policy.		-	-
3) Maintain local distinctiveness	Direct impact. The existing Brighton Centre is of poor architectural design. The policy specifies that proposals must be of high quality and innovative design, therefore is likely to lead to an improvement in local distinctiveness. In addition, the policy now makes a specific reference to improving townscape and other heritage assets. The Brighton Centre is situated next to The Grand hotel, which is a listed building and the seafront area is adjacent to the Regency Square Conservation Area, and therefore due care must	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	be taken not to detract from these. The requirements of CP12/13 should address this concern. In addition, any improvements to townscape and public realm will also help to improve local distinctiveness, particularly around the Western Road area.			
4) Protect South Downs	No impact on this objective.			
5) Provide decent, affordable housing	It is unlikely that the policy will result in the development of any housing, therefore there is no impact on this objective. Housing needs for the city will be met through other locations.			
6) Reduce amount of car journeys	<p>Also see objective 2.</p> <p>Direct impact. The SA considers the policy to contain some positive measures which promote sustainable and public transport, however any increase in retail offer and improved conference facilities may result in an increase in the number of car journeys in the local area. In addition, movements by freight are also high in the city centre, and the SA notes the reference in the supporting text regarding re-routing freight, which should bring about some positive impacts, however overall the impact is still considered to be negative.</p> <p>The policy priority A5 should ensure that new development is served by public and sustainable transport. In addition, this requirement is also repeated under the strategic allocation.</p> <p>It is unknown whether any additional parking will be made available, either for Churchill Square or the Brighton Centre developments, however any increase in car park capacity would be likely to lead to an increase in car journeys made to the area and at implementation stage.</p> <p>Some of the measures outlined in CP9 may mitigate against this.</p>		-	-
7) Minimise risk of pollution to water	Indirect impact. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city, which must be protected under the requirements of the Water Framework Directive. The development area consists of entirely urbanised areas therefore new development is unlikely to cause an increase in non-permeable surfaces. According to the SFRA 2012 the area is considered to be at low risk of surface water flooding. New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.	+	+	+
8) Minimise use of water	Indirect impact. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. CP8 and SPD08 should ensure that water consumption is minimised.	-	-	-
9) Promote development of	Direct impact. The policy is likely to have a positive impact on this objective as the	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
contaminated land	development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have caused localised contamination. Further investigation would need to be carried out at planning application stage.			
10) Manage coastal defences	The central seafront area is currently protected by the large shingle beach controlled by a field of concrete and timber groynes. Over time the beaches may become narrower and the defences exposed, however development in this location is unlikely to lead to a negative impact on coastal defences. Protection of the coastline addressed under SA1.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. The impact is likely to be significantly positive on this objective in the medium to long term, with key aims of the policy to sustain the tourism, leisure and retail-based economy for the next 30 years. The policy should lead to a minimum of 20,000sqm of additional retail floorspace being delivered which should significantly increase retail-based employment opportunities in the area. In addition, new conference facilities should lead to an increase in business/conference trips to the city, and lead to increased opportunities for employment in this sector. Increased conference trips in particular is likely to lead to an increase in need for midweek hotel space and service sector employment. The SA notes that the policy no longer contains a reference to build a hotel as part of the scheme in order to allow for flexibility, and this is not considered to have any impact on the effect or score. The SA welcomes the new requirement for training to be secured for local people, which should also impact positively on this objective.	+	++	++
12) Support economic development	Direct impact. As with objective 11. The policy is likely to lead to an increase in economic activity, particularly in the retail, business and conference sectors, as well as promoting tourism and enhancing facilities for visitors. In addition, any development will lead to an increase in need for workers during construction stage, having wider economic benefits. As above, the removal of the reference to a hotel is not considered to have any impact on the objective, with the overall impact remaining positive. In addition, the new reference in the supporting text with regards to timing the development with other major development in the city, should help to ensure that there is no shortfall in music or conference facilities during the re-development, and this will have positive impacts on this objective. Development proposals will need to submit an impact assessment, as required by CP4.	+	++	++
13) Improve health	Direct impact. There are various factors whereby this policy could have a positive impact on health. The provision of employment opportunities is a wider determinant of health. Improvements to townscape/public realm and overall appearance of the area will contribute towards improved mental well-being. Improved cycling and walking networks which may encourage a reduction in car-use and congestion, and may encourage physical activity would have a range of positive impacts on health. As the policy is concerned with development, there may be adverse health impacts	+	+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	associated with new development, both at construction and operation state, however these should be addressed under the requirement to carry out HIA through CP18. However, should an increase in car-based traffic and congestion occur, there is the potential to have a negative impact on health, mainly linked to road safety and air quality, but also road-related noise, in the long term.			
14) Integrate health and community safety	The Development Area is located within the Regency ward which contains the most deprived LSOA (in the crime domain) in Brighton & Hove, as well as several LSOAs falling within the 20% most deprived (crime domain) in the UK (IMD 2010). The policy makes reference to the community/public safety issues associated with the West Street area located within the Development Area and seeks to ensure that any replacement leisure facilities help to ensure a more balanced range of evening economy uses in order to address these issues. In addition, the policy also specifies that contributions towards improving community and public safety in this area will be required. This should help to improve community/public safety in this area.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	Direct impact. Areas within the Regency ward fall within the 20% most deprived in the overall domain in the IMD 2010, with the crime and living environment domains being of particular concern. The policy seeks to address some of these concerns, particular the issue of crime and community safety. The policy should also help to secure training for local people, which would contribute towards reducing skills and employment deprivation.	+	+	+
16) Engage local communities	Indirect impact. There will be a variety of opportunities for community engagement through delivery of this policy.	+	+	+
17) Make the best of previously developed land	Direct impact. The area is all previously developed land	+	+	+
18) Sustainable energy	Direct impact. Any new development or redevelopment will lead to an increase in energy use, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the SA recognises that the policy now encourages developments to consider heat network systems, for current or future developments, and this is considered to bring about positive impacts. In addition, government targets for all non-residential development to be zero carbon by 2019 should also ensure the impact is positive in the medium to long term.	+	+	+
19) Taking account of the changing climate	No direct impact. Although situated along the coastal frontage, the area is not in a tidal flood risk area, (with climate change). In addition, the area is at low risk of surface water flooding. Therefore, development in this location is not anticipated to impact on the city's or the developments ability to adapt to climate change. Therefore, there is no direct impact. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, however CP8 requires all development to			

SA Objective	Summary of effects	Short term	Medium term	Long term
	be able to respond to changing needs.			
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no longer any specific reference for development within the area to meet specific standards, including the strategic allocation. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-
21) Increasing accessibility	Direct impact. The improvements to pedestrian and cyclist access through the area, as well as improvements to public transport and the requirement to improve permeability and legibility should increase accessibility both to the new developments as well as to wider central Brighton area.	+	+	+
22) Reduction of waste	Indirect impact. Redevelopment of the Brighton Centre as well as an extension to Churchill Square is likely to lead to an increase in waste at construction stage, although this would be minimised through implementation of the Construction & Demolition Waste SPD and through the requirement for a SWMP. However, it is likely that increased capacity would also cause an increase in waste at operational stage.	-	-	-

DA2 Brighton Marina, Gas Works and Black Rock

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The Marina itself has a severe lack of green open space and biodiversity therefore development could increase the amount of biodiversity in the Marina itself, e.g. through features that enhance or encourage biodiversity. However the site is adjacent to an SSSI and three SNCIs, some of which contain habitats of International Conservation Importance (coastal vegetated shingle). There is also much maritime biodiversity that has colonised the marina environment which is now dependant on the unique micro-habitat. In addition, the National Park boundary comes to the cliffs to the east of the Marina and development has potential to have a direct or indirect negative impact on any of these designated sites. The Marina is also now surrounded by a Marine Conservation Zone.</p> <p>However, the SA notes that the policy makes specific references to protecting the ecological environment, enhancing the biodiversity, geodiversity and having regard to the designated sites located within or adjacent to the Marina, as well as implementing an ecological masterplan, and these requirements should ensure the protection of these key sites, as well as biodiversity in general. In addition, the policy makes a specific requirement to create links between green spaces. Therefore a -/+ score is awarded to reflect the potential risks of development in this area but the positive aspirations of the policy.</p> <p>In addition to the requirements of the policy, CP10 should also ensure that negative impacts are avoided.</p>	-/+	-/+	-/+
2) Improve air quality	<p>DA2 is currently situated outside the declared AQMA. The DA is currently served by public transport, however access for pedestrians and cyclists is poor. There are a number of measures contained within the policy that should help to improve access and connectivity to the wider area and thereby have a positive impact on local air quality including: improvements to public realm, enhancement of transport infrastructure, enhanced bus service and improved pedestrian/cyclist access.</p> <p>However, the policy includes a variety of different types of developments, with a significant number of housing units, all of which are likely to put increased pressure on transport infrastructure available and may result in an increase in people travelling by car, either for visiting the Marina for leisure/work purposes or as residents, or an increase in journeys made by other forms of transport, e.g. for delivering goods and so on. The amount of housing to be delivered could significantly increase local car ownership, which may worsen air quality in and around the area, unless a significant amount of car free housing is delivered, and is likely to result in sensitive receptors being located by the roadside.</p>	-	-	--
3) Maintain local distinctiveness and sites	<p>Built environment: The Marina area itself does not have a coherent urban form and the areas of public</p>	-/?	-/?	-/?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>realm have resulted from piecemeal, haphazard development over time. There are few buildings to note within the area, however the Kemp Town Conservation Area, which contains numerous listed buildings, lies to the north west of the Marina and therefore any development must have due regard and not detract from this status. The policy is likely to lead to improvements to local distinctiveness within the Marina area itself, through creation of a sustainable mixed use area of the city containing high quality building design, whilst preserving and emphasising the traditional Marina uses. The policy no longer has a restriction on building height in relation to the cliff future development proposals may come forward with tall buildings. This may impact upon the settings of or views from the adjacent Conservation Area and listed buildings. Tall buildings adjacent to the cliff may also impact upon strategic views along the seafront, particularly of the cliffs east of the Marina when viewed from the west. The impact is therefore considered to be uncertain and will depend on the specific design of any proposed scheme. See mitigation.</p> <p>Open space: The policy specifies that open space must be provided in accordance with other city plan policies. It is presumed that this will be balanced with competing uses, however the SA considers it unlikely that the full open space needs of the future population will be able to be met on site. Open space is currently lacking on site, however the SA recognises that the site is adjacent to and within walking distance from most typologies of open space although is on the outer boundary of provision for children and young people, and is not within reasonable distance to provision of allotments, however actual access to these sites from within the Marina area is poor. The presumed inability to provide additional open space on site, is reflected in the negative aspect of the score.</p>			
4) Protect South Downs	<p>The Marina area is situated adjacent to the SDNP boundary. The policy no longer specifies that development should not breach cliff height. Development that goes above cliff height could have adverse impacts on the setting, or of views from or of the SDNP and will depend on the specific design of any proposed scheme. The policy is therefore considered to have uncertain impacts on this objective. See mitigation.</p>	?	?	?
5) Provide decent, affordable housing	<p>The policy should provide 1940 residential units, some of which will be affordable in accordance with CP20 and will therefore have a significantly positive impact on this objective.</p>	+	++	++
6) Reduce amount of car journeys	<p>The Marina is currently served by public transport, however access for pedestrians and cyclists is poor. In addition, there is currently a large free car park that encourages people to drive to the Marina for leisure or other purposes. The policy includes a variety of different types of developments, with a significant number of housing units, all of which are likely to put increased pressure on transport available and may result in an increase in people travelling by car, either for visiting the Marina for leisure/work purposes or as</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>residents, potentially adding to existing congestion. In addition, access is limited to the Marina via the vehicular ramps which dominate the Marina environment.</p> <p>There are a number of measures contained within the policy that should help to improve access and connectivity to the wider area and thereby have a positive impact on reducing the number of journeys made by car including: improvements to public realm, enhanced bus service, enhanced transport infrastructure and improved pedestrian/cyclist access. In addition, the policy now also states that proposals should maximise opportunities to reduce car ownership. However, despite the positive aspirations of the policy, the SA considers that congestion and car ownership and travel to accommodate the needs of other uses located within or around the marina will increase as a result of the policy.</p> <p>The cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures.</p>			
7) Minimise risk of pollution to water	<p>The SFRA 2012 identified the entire site to be at risk of surface water flooding in the 1 in 200 year event and the area currently dominated by the existing supermarket car park to be at risk in the 1 in 30 year event. Therefore development in this location would need to be planned in order to reduce the consequence of flood risk and to ensure that flood risk is not increased elsewhere.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>	-	-	-
8) Minimise use of water	<p>Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>The requirements of CP8 should ensure that water consumption is minimised.</p>	-	-	-
9) Promote development of contaminated land	<p>The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage. In addition, the Gas Works site has potential for significant contamination, and part of the site has already been remediated and the policy now contains a new requirement to show that potential new uses would be compatible with possible land contamination.</p>	+	+	+
10) Manage coastal defences	<p>The SFRA 2008 and 2012 indicates that Brighton Marina is situated within floodzone 3a (high probability of flooding) and therefore the impact on this objective is considered to be negative. The SFRA also found the area to be at increased risk of flooding due to climate change, due to reduction in the standard of protection provided by the inner</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>harbour walls over time.</p> <p>All development proposals would need to carry out a site specific flood risk assessment and any development proposals for more vulnerable uses would need to pass the sequential and exception tests. The SA notes that the policy requires developments to be in accordance with the Shoreline Management Plan and incorporate site specific flood risk assessments in line with recommendations set out in the SFRA.</p> <p>There is the risk that any construction works could destabilise the cliffs, however the policy requires development proposals to accord with the relevant Shoreline Management Plan which should avoid any negative impact on the sea defences and cliff stability.</p>			
11) Employment: balance needs of tourists, residents and businesses	<p>The policy is likely to have a significant positive impact on this objective in the medium to long term, through provision of a range of development uses. The policy should lead to 5,000sqm retail floorspace situated in the Inner Harbour area, 2,000sqm of industrial employment floorspace (B1 and B2) at the Gas Works area, and 10,500sqm of leisure floorspace at the Black Rock area and the Gas Works area, as well as other uses. The SA notes that the amount of industrial to be delivered has reduced based on findings of the Employment Land Study and that the amount set out in the policy is considered to be achievable given the site constraints.</p> <p>The delivery of this amount of varying uses will meet the needs of residents and tourists alike and provide opportunities for employment on site, both during construction and operation stage. There is also a requirement that some of the B1 and B2 floorspace includes a range of sizes of units, including small and start-up units, which will help to meet the needs of a variety of industries. The leisure facilities at the Black Rock site will further benefit existing shops, restaurants and others located within the Marina, with potential for increased footfall. Employment created in this location could be of particular benefit locally, and the SA welcomes the new requirement for all strategic allocations to provide training for local people, which could help reduce employment based deprivation. The SA notes that the reduction in industrial floorspace will need to be met elsewhere in the city, to ensure the city's overall needs for this type of floorspace is not compromised.</p> <p>The SA notes the amendments to the policy relating to the removal of the District Centre status. Although this may impact on the mix of uses located within the area, this is not considered to result in any adverse impacts against this objective when set within the wider context of the policy.</p>	+	++	++
12) Support economic development	<p>As with objective 11, the policy should be positive for a number of sectors, particularly, retail and independent retailers through helping to improve the performance of the area, benefiting existing shops and services, as well as providing need for additional uses as outlined above. In addition it will provide leisure and recreation facilities that attracts visitors and residents to the area, having wider economic benefits for the area. The policy also seeks to protect the existing marina related uses, benefiting the leisure and</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>hospitality sectors and also aims to provide for varying employment needs through delivery of office and industrial, including start up units. All of these anticipated outcomes will have positive impacts and support economic development. Again, as stated under objective 11, the reduction in the amount of industrial employment floorspace delivered will need to be met elsewhere in the city, to ensure economic growth in this sector is not compromised.</p> <p>The SA notes the amendments to the policy relating to the removal of the District Centre status. Its removal from the retail hierarchy will mean that the sequential test for out of town shopping proposals would no longer take into consideration the Marina as a town centre location risking out of town retail developments in the east of the city. An impact assessment for larger proposals would also not be required to look at the impact of the proposal on the Marina. The removal of the district centre status may also result in a lack of uses that are more familiar with a district centre from being delivered, such as banks, post offices etc. This will become more significant in the long-term with the delivery of more housing when the need for a balanced variety of uses to meet day to day needs of residents becomes more acute. The policy seeks to address this by specifying that a detailed policy regarding the appropriate type and mix of A1 and non A1 uses for the Marina will be set out in Part 2. On balance, the policy is still considered to have positive impacts for economic development, leading to significantly positive impacts in the long term.</p>			
13) Improve health	<p>Overall, there should be positive implications for health resulting from delivery of this policy. This is due to the provision of housing and employment, both of which are wider determinants of health as well as the range of services that would usually be located in a district centre. In addition, the provision of a new health facility either within or in the vicinity of the Marina will also have benefits in terms of access to health facilities, and a new community facility will have benefits in terms of access to social activities and community cohesion. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being. In accordance with CP18, a Health Impact Assessment of the strategic development would need to take place in order to ascertain impact on existing communities. However it is acknowledged that any increase in traffic could have negative impacts on health in the long term, due to reduced air quality, increased noise and road safety.</p>	+	+	-/+
14) Integrate health and community safety	<p>Although improving community safety is not a key priority, the policy is likely to result in measures that prevent anti-social behaviour, through design of buildings that offer natural passive surveillance and a mixed-use community. Improvements to access for pedestrians and cyclists, as well as improvements to permeability should also lead to improvements in road safety.</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
15) Narrow the gap between deprived areas and rest of the city	<p>The Marina is situated within the Rottingdean Coastal ward, although is situated in closer proximity to the adjacent East Brighton ward, which lies to the north of the Marina. The East Brighton ward has significant levels of deprivation, with some LSOAs situated within the ward having the highest levels of deprivation in the city in some domains, including income and education & skills.</p> <p>The policy is likely to have a positive impact on narrowing the gap and reducing inequalities through a variety of infrastructure that will be delivered or improved through implementation of the policy, e.g. community building, GPs practice, and additional school places. All of these will be needed to meet the needs of the predicted increase in population resulting from increased housing in the area as well as meeting existing needs. In addition, employment created in this location could be of particular benefit locally, with several local super output areas located in East Brighton area suffering from high levels of employment and income deprivation, and the new requirement for developers to provide training for local people should further enhance opportunities.</p>	+	+	+
16) Engage local communities	The policy will allow for engagement of the local community through consultation on strategic developments coming forward.	+	+	+
17) Make the best of previously developed land	The Development Area is all previously developed land therefore the policy should have a positive impact on this objective. The policy makes a specific reference to optimising development on PDL through delivery of high density mixed development.	+	+	+
18) Maximise sustainable energy	<p>Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies.</p> <p>The policy has a specific reference to maximising opportunities for large-scale zero and low-carbon energy technologies to serve the Marina and wider city reflecting the positive score. However the main modification that allows viability and deliverability to be considered as grounds on which this requirement is not delivered brings about a certain degree of uncertainty. The policy does also encourage developers to consider heat network infrastructure, which would also have positive implications for this objective.</p> <p>The government targets for all new homes to be zero carbon by 2016 and all new non residential development to be zero carbon by 2019, should also ensure the impact is mainly positive. In addition, CP8 sets various requirements.</p>	+?	+?	+?
19) Taking account of the changing climate	The potential impacts of climate change include an increase in extreme weather events, e.g. droughts, storms and heavy rainfall, as well as predicted rises in sea level which will increase the likelihood of tidal flooding. The SFRA 2012 outlines areas which will be at risk of tidal flooding as a result of the effects of climate change and this includes areas situated on the developed area of the Marina. Development in this area is therefore considered to be at greater risk of the impacts of climate change, particularly coastal	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>flooding with climate change reducing the effectiveness of the existing sea defences over time.</p> <p>New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, likely to be more prevalent in the exposed location of the Marina. CP8 requires all development to be able to respond to changing needs and CP11 ensures coastal defences are protected.</p>			
20) Meet BREEAM / Code for Sustainable Homes	<p>Although the proposals will be expected to meet the building standards set out in CP8, there is no specific requirement within the policy, and therefore the impact on this objective is considered to be negative.</p> <p>CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.</p>	-	-	-
21) Increasing accessibility	<p>The policy should have a positive impact on this objective. Improvements to access to the area should occur, including pedestrian and cycle access, as well as improvements to public transport. In addition, the policy will also result in a variety of developments and infrastructure, including healthcare provision, a community building, housing and employment opportunities, thereby increasing provision for local people to access local services. The removal of the district centre status may result in a lack of uses that are more familiar with a district centre from being delivered, such as banks, post offices etc. This will become more significant in the long-term with the delivery of more housing when the need for a balanced variety of uses to meet day to day needs of residents becomes more acute. The policy seeks to address this by specifying that a detailed policy regarding the appropriate type and mix of A1 and non A1 uses for the Marina will be set out in Part 2. On balance, the policy overall is still considered to have positive impacts for accessibility, leading to significantly positive impacts in the long term.</p>	+	++	++
22) Reduction of waste	<p>Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.</p>	-	-	-

Policy DA3: Lewes Road

SA Objective	Summary of effects	Short term	Medium term	Long term
<p>1) Protect and enhance biodiversity</p>	<p>Direct impact. The policy includes the strategic allocation of a Greenfield site, Woollards Field South, which is situated to the north of the Development Area. Although separated by the A270, the site is adjacent to Stanmer Park, which is within the boundary of the SDNP, is a Historic Park & Garden, and is a proposed Local Nature Reserve (see also objective 3).</p> <p>The loss of any Greenfield site has potential to have adverse impacts on biodiversity, depending on the species and habitats present. It is understood that an Ecological Study was submitted as part of the planning application for The Keep, situated on the remainder of the site Woollards Field, made various recommendations in relation to retaining, or replacing and improving the existing habitats with a score of +91 nature points when assessing the proposals against the requirements of the SPD11 (Nature Conservation). Additional requirements were also made as part of the decision and includes planting and features to be implemented around the wider site.</p> <p>To the south of The Keep, the area is predominantly amenity greenspace, and is likely to be of low ecological value, however would need to be assessed as part of any planning application making the impact uncertain.</p> <p>The policy also includes the allocation of Falmer Released Land, which is a brownfield site and currently contains buildings that formed part of the former Falmer High School. This site lies adjacent to the Bevendean Down Local Nature Reserve and the Westlain Plantation SNCI. This SNCI is ancient semi-natural broad-leaved woodland, which is considered rare locally. It is understood that discussions with the council's ecologist took place prior to the planning application for development of the car-park/Bridge Community Education Centre being submitted and that mitigation measures have been included to ensure the protection of this woodland area, including a 15m buffer zone around the site. The planning application also proposes management within the buffer zone to increase the ecological value of the buffer zone.</p> <p>The policy also includes the strategic allocation of the Preston Barracks site. The Brighton University (Watts Bank) SNCI is situated within the site boundary, and is adjacent to the Crespian Way SNCI. The Watts Bank SNCI is also an adopted Greenway. The SA recognises that the policy contains various references which should lead to an increase or improvement to existing biodiversity along the Lewes Road, with improvements to public realm and townscape, including greening of the route, one of the local priorities, as well as delivering biodiversity improvements contributing to Biosphere Objectives. The strategic allocations also all require development to contribute towards BAP objectives. These requirements contained within the policy should have a positive impact on biodiversity, however overall it is also considered to be uncertain as will depend on what improvements are implemented, as well as the results of site surveys.</p>	<p>+?</p>	<p>+?</p>	<p>+?</p>

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>In addition, CP8 requires all non-residential development on Greenfield sites to meet BREEAM excellent, which includes requirements for ecology. New development elsewhere throughout the Development Area also provides the potential to enhance biodiversity through incorporation of biodiversity features in accordance with CP8 and CP10.</p>			
2) Improve air quality	<p>Direct impact. The DA was chosen due to its location on a sustainable transport corridor, therefore having good existing access to public transport (both bus and train). One of the overarching aims of the policy is to facilitate, promote and invest in sustainable transport infrastructure, which includes bus, walking and cycling as well as improve air quality along Lewes Road, including ensuring development seeks to improve or mitigate air quality impacts. The policy therefore contains various proposals which are considered to be beneficial for air quality. In addition, strategic allocations are also required to provide sustainable transport infrastructure to support the schemes and ensure there is no adverse air quality impact.</p> <p>However, as the policy is concerned with significant development, including residential and employment development there is the risk that car ownership within the area or journeys by various other forms of transport, including freight, to/from and through the area could increase, which would have an associated impact on air quality.</p> <p>A significant proportion of the Lewes Road is currently located within the AQMA 2013 and has always been within the former AQMA designations due to the exceedance in levels of NO₂ with 2011 monitoring within the Air Quality Progress Report 2012 and more recent updates showing the annual NO₂ levels to have exceeded the air quality objective at various locations on Lewes Road. The SA suggests that the area would be suitable for low-car or car-free housing due to its location. Monitoring at the diffusion tube sites will help to measure the impact on air quality.</p> <p>In addition to the priority of air quality in the policy, CP9 should help to minimise the impact on air quality.</p>	-	-	-
3) Maintain local distinctiveness	<p>The Lewes Road area contains a mixture of land uses, including housing, areas of open space, educational establishments and retail. The area as a whole has a mixed and generally poor quality townscape and public realm and is separated in parts by a busy dual carriageway that carries a large volume of traffic. The townscape and public realm is likely to improve, with this being an overarching aim of the policy and the comprehensive design guidance produced for the area will ensure continuity in design. In addition, there are various references to protecting locally or nationally designated sites, such as the SDNP, SNCIs and will also include other designations.</p> <p>The policy also seeks to secure improvements in open space, with reference to Saunder's Park, William Clarke Park as well as under-used spaces in Moulseccomb and Bevendean. The northern wards of the Development Area are within good proximity to most typologies of open space, and can meet the needs of future population levels</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>across most typologies, however the southern wards of the Development Area don't meet the needs of existing population levels. Woollards Field is classified as amenity green space in the Open Space Study update, with the study indicating that the needs of the existing and future population, in terms of access to amenity greenspace are being met, therefore the loss of this site to development is unlikely to have any adverse impact in relation to access to this type of open space. It is understood that The Keep development on this site has secured improvements to the children's play area located at the edge of the site, as well as other open space improvements on the site.</p> <p>The Development Area is bounded by Stanmer Park to the north, which is within the SDNP, is a Historic Park and Garden and a proposed Local Nature Reserve and a Conservation Area. The Valley Gardens Conservation Area which includes the Level, is situated at the southern edge of the Development Area. There are 3 SNCIs located within the Development Area, two of which are in close proximity to the Preston Barracks site, the other situated to the north of the Falmer campus, on the edge of the Development Area. In addition, the Westlain Plantation SNCI adjoins the Falmer Released Land site.</p> <p>Overall, the impact of this policy on this objective is considered to be mixed. Although the impact is likely to be positive through improvements to townscape and protection of distinctive sites, the provision of this amount of housing in this location could have implications on open space, and meeting the open space needs of the future population, particularly in the southern part of the Development Area.</p>			
4) Protect South Downs	<p>The Lewes Road provides an important link from Brighton to the Downs. Improvements to sustainable transport along the Lewes Road is likely to lead to improved sustainable access to the Downs and now the supporting text includes a reference to improving sustainable transport access to the SDNP. Although there is a risk that development in some locations within the Development Area may impact on the setting of the National Park, the policy now contains two separate references which should ensure there are no adverse impacts on the setting of the SDNP from development. The impact is therefore considered to be positive.</p>	+	+	+
5) Provide decent, affordable housing	<p>The policy specifically states that 875 housing units, of a mix of dwelling types, tenure and sizes, will be delivered in the area over the plan period. 300 of these units will be delivered at the Preston Barracks site, with the remainder spread throughout the development area (to be allocated in Part Two of the City Plan. This is slightly more than previous iterations of the policy and is based on the SHLAA 2014. A proportion of affordable units in accordance with CP20 will be delivered, therefore having a positive impact on this objective. In addition, the delivery of bedspaces for students will have positive implications in relation to provision of student accommodation, as well as having indirect impacts on existing housing stock, e.g. through less need to rely on HMOs for student accommodation.</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
6) Reduce amount of car journeys	<p>See also Ob2. There are various positive measures within the policy including; the fact that the DA is situated on a sustainable transport corridor which is already served by good public transport; the commitment to investment in bus, cycle and pedestrian routes along and across Lewes Road and by ensuring that strategic allocations are supported by sustainable transport infrastructure. In addition, measures to improve the Falmer interchange, may help to ease congestion. The supporting text also suggests that re-routing of buses may be required in order to support major development, and this would also bring about positive impacts.</p> <p>However, as described under Objective 2, the different types of developments described within the policy may lead to an increase in car ownership in the area, or may increase the number of journeys by vehicles, that are made to/from and within the area, including employment-based journeys, such as freight. In addition, any increase in traffic is likely to result in increased noise levels, which are already high in this area, (over 75 decibels in some locations) as outlined by the DEFRA road noise mapping exercise.</p> <p>Although part of the Community Stadiums approved transport strategy and assessed as acceptable, a car park at the Falmer Released Land site will result in an increase in car journeys to the area at certain times.</p> <p>The cross-cutting policy for sustainable transport (CP9) should help to mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures.</p>	-	-	--
7) Minimise risk of pollution to water	<p>Indirect impact. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city. The development area mainly consists of urbanised areas, although is adjacent to some areas of open space. Any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, a problem in itself, and can lead to pollution of groundwater. In addition, contaminants in the soil can be disturbed during construction, which can leach into groundwater.</p> <p>The SFRA 2012 states that the site is at risk of surface water flooding in both the 1 in 30 and 1 in 200 year events. The SFRA also shows there is a major surface water flow path, mostly coinciding with the A270, with many small local streets adjacent to the A270 at risk as well as the potential for significant areas of ponding around the Level. Site specific flood risk assessments would need to be carried out to ensure flood risk is not increased elsewhere as a result of development.</p> <p>The SA recognises the requirement relating to protection of groundwater should result in positive impacts against this objective, however the risk of surface water flooding remains, resulting in a mixed score.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk and should be addressed under CP1 and CP10. Opportunities for biodiversity based SUDS should be encouraged where possible. If development is situated in areas</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	highlighted at being of risk, then the development should be sequentially planned.			
8) Minimise use of water	Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. CP8 and SPD08 should ensure that water consumption is minimised.	-	-	-
9) Promote development of contaminated land	The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage. Further investigation at planning application stage should ensure that any contamination is identified and steps taken to remediate it.	+	+	+
10) Manage coastal defences	Development within this area is unlikely to have any impact on the coastline, therefore there is no impact with this objective.			
11) Employment: balance needs of tourists, residents and businesses	The policy is likely to have a positive impact on this objective. The policy should result in delivery of 15,600sqm additional employment floorspace over the two strategic allocations. In addition, the policy seeks to secure 16,000sqm of additional academic floorspace to be delivered over the Preston Barracks site. Development of any kind will help to bring about employment opportunities at construction stage, and additional employment floorspace will help to meet the employment/office needs of the city enabling the economic base of the city to grow. The SA also notes that the allocation on the Woollards Field site now includes some flexibility to allow for alternative employment generating uses which is considered positive in the current economic climate. All strategic allocations require the developers to agree to secure training for local people, which could help to reduce employment and skills based deprivation locally, as well as increase local people's long-term employment opportunities. In addition, expansion of the University sites will help the Universities to continue to attract students to the city, and generate additional employment opportunities both on site and elsewhere, recognising the significant role the Universities play in the local economy.	+	++	++
12) Support economic development	The policy is likely to lead to an increase in employment floorspace, making a significant contribution towards the city's assessed needs of new employment floorspace. This will lead to an increase in economic activity both at construction and operational stage and therefore have a positive impact on this objective. Expansion of the universities will lead to increase in the student economy, which is significant in Brighton & Hove. The policy recognises the fact the Lewes Road District Centre is underperforming and the comprehensive design guide for the area will help to influence future development proposals and therefore improve the local shopping environment. In addition,	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	improvements to sustainable transport and public realm will help to revitalise the shopping district. As described in Ob11, strategic sites will be required to secure training for local people.			
13) Improve health	<p>Overall, in the short/medium term there should be positive implications for health resulting from delivery of this policy. The provision of housing and employment, are both wider determinants of health, and the provision of training for local people, should improve employment prospects of local people. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being, particularly through added biodiversity along the route. Improved sustainable transport infrastructure, as well as improved cycle and pedestrian routes will improve access to services and may help to reduce journeys made by car.</p> <p>There may be implications for health of neighbouring communities during construction of any development, however the requirement for all strategic sites to undergo a HIA in accordance with CP18 should minimise any potential impacts.</p> <p>However, in the long term, the potential increase in traffic remains a concern, as this could result in a negative impact on health, due to increased risk of road accidents, reduced air quality and increased road-related noise, resulting in mixed impacts in the long term, although the SA recognises that improvements to air quality and noise are priorities of the area.</p>	+	+	-/+
14) Integrate health and community safety	<p>One of the key local priorities is to secure improvements to community safety. Community safety is likely to be improved through proposed improvements to open spaces in the area, including Saunder's Park, William Clarke Park and under-used open spaces in Moulsecocomb and Bevendean. In addition, improvements to the public realm in the south Lewes Road area should also help to improve/reduce community safety issues as identified in the Community Safety, Crime and Drugs Audit 2004.</p>	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>The Lewes Road Development Area crosses areas and neighbourhoods with varying levels of deprivation. According to the Index of Multiple Deprivation 2010, in the overall domain score, Moulsecocomb and Bevendean ward contains 2 Super Output Areas (SOA) that are within the 10% most deprived in England and are the 8th and 10th most deprived SOAs in the city. The Hanover & Elm Grove ward contains 1 SOA that is within the 10% most deprived in England and is the 18th most deprived SOA in the city. The Hollingbury & Stanmer ward contains 3 SOA that are within the 10% most deprived in England and are the 4th, 7th and 16th most deprived in the city.</p> <p>There are numerous issues relating to inequalities found within these neighbourhoods, including high levels of obesity, teenage pregnancy and unemployment, and low educational attainment. There are positive measures that should help to reduce inequalities throughout the Development Area including securing provision of a community building and increased employment opportunities, which is one of the key local priorities for the area. In particular, strategic developments will be required to</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	secure training for local people. Improved sustainable transport will also help to improve access to services.			
16) Engage local communities	Development for the area will be subject to community engagement and public consultation.	+	+	+
17) Make the best of previously developed land	The Preston Barracks site is situated on PDL, some of which currently has no productive uses on site, and therefore re-development of this site would have a significantly positive impact on this objective. The situation is similar for the Falmer Released Land. However, Woollards Field is a Greenfield site and therefore redevelopment of this site would not be making the best of previously developed land and would have a negative impact against this objective, resulting in mixed impacts.	-/+	-/++	-/++
18) Sustainable energy	Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. The former requirements for Preston Barracks and Falmer Released sites to be zero carbon have been removed. Woollards Field will still be expected to achieve zero carbon status. Policy requirement 8 still requires developers to consider low and zero carbon decentralised energy, in particular heat network infrastructure, and this is considered to bring about positive impacts against this objective. In addition, the government's target for all new residential development to be zero carbon by 2016 and all new non residential development to be zero carbon by 2019 will also help to ensure a positive impact against this objective in the medium to long term.	+	+	+
19) Taking account of the changing climate	New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. The SA notes that the former SA recommendation relating to Woollards Field, which is a Greenfield site, relating to runoff rates and reducing the heat island effect has been implemented, and therefore the impact on this objective is considered to be more positive, than previous iterations, however overall the impact is considered to be mixed. In addition, CP8 requires all development to be able to respond to changing needs as well as makes provision for off-site tree-planting and sustainable drainage.	-/+	-/+	-/+
20) Meet BREEAM / Code for Sustainable Homes	New development could fail to achieve high environmental standards and there is no longer any reference within the policy to meet specific standards including any of the strategic allocations. However it could be assumed that the requirement for the Woollards Field development to be zero carbon will result in high standard being achieved. Overall, the impacts are considered to be mixed. See mitigation. CP8 should ensure environmental standards are achieved.	-/+	-/+	-/+
21) Increasing accessibility	The policy should have a positive impact on this objective. The Development Area is located on a sustainable transport corridor, to which improvements will be made through	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	implementation of the policy, which will improve access to services. In addition, the policy will also result in a variety of developments and infrastructure, including a community building, housing and employment opportunities, thereby increasing provision and access. The policy should result in improvements to the retail environment and district centre, including accessibility.			
22) Reduction of waste	Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

DA4 – New England Quarter and London Road area

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. There are a significant amount of open spaces and habitats surrounding the development area, including the railway sidings at Brighton Station, which are an SNCI, The Level to the south, and Preston Park to the north. The London Road/Preston Road corridor is also lined with mature street trees of a variety of species which help to create a green approach to the city. As the policy is concerned with development, some of which is significant, there may be potential to harm existing biodiversity and habitats present in the area, although development also provides the opportunity to enhance existing biodiversity if particular features are incorporated, as well as provide opportunities to create links to the existing green infrastructure network. It is considered unlikely that development/redevelopment located at the strategic allocations would have an adverse impact on biodiversity.</p> <p>As the policy contains a specific priority to ensure connections are made between existing open spaces and greenways, and enhances biodiversity in the areas, the impact on this objective is found to be positive in the medium to long term.</p> <p>CP8 and CP10 should also ensure effect of new development is positive and enhances biodiversity.</p>	-	+	+
2) Improve air quality	<p>Direct impact. The DA was chosen due to its location on a sustainable transport corridor, therefore having good existing access to existing public transport (both bus and train). However the development area is situated with the AQMA 2013 and the 2012 Air Quality Progress Report and further updates identified an exceedance in the annual mean NO2 levels at various monitoring locations in this area. The current layout of the street particularly around the London Road Town Centre area, causes air to be trapped at street level, reducing dispersal of pollutants, known as the canyon effect.</p> <p>The policy includes a priority relating to improving air quality, which is welcomed, and provides additional detail of how improvements to air quality will be achieved, including achieving a modal shift. It also requires development to take account of impacts on air quality and to provide improvements or to mitigate impacts. However, the policy proposes certain amounts of development, including 1130 residential units and 20,000sqm of additional employment floorspace, as well as redevelopment of currently derelict or underperforming sites. This additional amount of development in the area is likely to have some impacts on the number of journeys made to the area and congestion, with potential for associated impacts on air quality either within the development area or on key roads within the surrounding area.</p> <p>The SA recommends development should ensure that sensitive receptors are located away from the roadside and also suggests that the area would be suitable for low-car or car-free housing due to its location. Monitoring at the diffusion tube sites will help to measure the impact on air quality.</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	In addition to the priority of air quality in the policy, CP9 should minimise the impact on air quality.			
3) Maintain local distinctiveness	<p>Direct impact. There is a range of different typologies of open space situated within or in close proximity to this development area, however as the Open Space, Sports and Recreation Study 2008 and the Open Space Study Update 2011 show, additional open space of all typologies will be needed to meet the needs of the future population in the St Peters and North Laine ward and any development of either housing or commercial uses must ensure that the open space requirements of the future population can be met. It is questioned whether the open space requirements of the increased population resulting from the increase in residential units and employment space will be able to met within the Development Area and how pressured the existing areas of open space or those near to the Development Area will become. There is no reference to provision of open space in the policy, reflecting the negative score in the medium and long term although it is recognised that the policy does require enhancements to open space, which was recommend by the SA at the last stage. CP16 should ensure the open space requirements are met.</p> <p>The policy should help to maintain and improve local distinctiveness, with particular emphasis on revitalising the London Road shopping area, reflecting the positive score. Any development, particularly tall buildings which have been identified as being suitable for this area, should consider the impact on neighbouring conservation areas, as well as historic buildings located within the area, including The Duke of Yorks' cinema and St Bartholemew Church. It is considered unlikely that development/redevelopment located at the strategic allocations would have an adverse impact on the historic built environment. In addition, CP12, CP13 and CP6 should ensure this issue is addressed.</p>	+	-/+	-/+
4) Protect South Downs	No impact. Development within the built up boundary of the city is unlikely to have any impact on the South Downs, although any tall buildings could impact on views of or from the Downs.			
5) Provide decent, affordable housing	Direct impact. The policy states that 1130 residential units will be delivered in the area over the plan period and is based on the SHLAA update 2014. This is a small decrease from previous iterations of the policy. It is understood that the majority of these are expected to come forward in the short/medium term. This will include a proportion of affordable units, therefore having a positive impact on this objective. The policy should also lead to the delivery of student housing, which not only has positive implications for the student community, but also helps to reduce the reliance on the need for privately-let HMOs.	++	++	++
6) Reduce amount of car journeys	Direct impact. Also see objective 2. As described, the situation of the development area to good existing modes of sustainable transport means that the area is well-placed to	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>support this scale of development. In addition, the proposals to locate mixed-use development within the area should help to reduce the need to travel by car and new employment opportunities arising could potentially lead to an overall reduction in out-commuting (city-wide).</p> <p>However, the delivery of 1130 units of housing may cause a significant increase in car ownership in the area, unless a large proportion of units are low-car/car free or are accompanied by substantial sustainable transport options and this location is considered to be particular suitable for this type of housing. The delivery of 20,000sqm of new office floorspace, and redevelopment of 14,000 sqm at the Preston Road sites is also likely to cause an increase in people travelling to the area for employment purposes, employment-related journeys (freight etc) as could improvements to the shopping area. As this is one of the main entry points to the city for people travelling by car, the area could also suffer from further congestion from visitor-based development elsewhere in the city.</p> <p>It is noted that priority 7 refers to improving the pedestrian and cyclist environment and that priority 6 specifically refers to achieving a modal shift through improvements to bus, pedestrian and cyclist routes, which is welcomed, and that the importance of the National Cycle Route 20 is recognised. In addition, the cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy.</p>			
7) Minimise risk of pollution to water	<p>Indirect impact. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city. The development area mainly consists of urbanised areas, although is adjacent to some areas of open space. Any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, a problem in itself, and can lead to pollution of groundwater. The SFRA 2012 shows that the eastern edge of the site along London Road and adjacent streets are more susceptible to surface water flooding in the 1 in 200 year event and that a site specific flood risk assessment would need to be carried out to ensure flood risk is not increased elsewhere.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible. If development is situated in areas highlighted at being of risk, then the development should be sequentially planned.</p> <p>In addition, contaminants in the soil can be disturbed during construction, which can leach into groundwater. Further investigation at proposal stage should ensure that any contamination is investigated and remediated.</p>	-	-	-
8) Minimise use of water	<p>Indirect impact. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p>	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	CP8 and SPD08 should ensure that water consumption is minimised with SPD08 recommending new build residential reach level 4 CSH and non residential meet 60% BREEAM (for major developments).			
9) Promote development of contaminated land	Direct impact. The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage. A substantial amount of remediation work has been carried out as part of the Brighton Station/New England Quarter redevelopment which is now nearing completion.	+	+	+
10) Manage coastal defences	There is no impact on this objective. The Development Area, including the strategic allocations are not situated in an area at risk of tidal flooding.			
11) Employment: balance needs of tourists, residents and businesses	<p>Direct impact. The policy is likely to have a significant positive impact on this objective in the medium to long term, as the main aims for the area is to create a major new business quarter for the city, as well as revitalise the shopping area of London Road Town Centre, which was found to be underperforming in the Retail Study Update 2011, both of which are likely to result in employment opportunities.</p> <p>The policy contains three strategic allocations, over which the policy seeks to provide 20,000sqm new office floorspace, the upgrade and refurbishment of New England House, and the replacement of the existing 14,000sqm of floorspace on the 125-163 Preston Road site. Development at this level will create opportunities for employment at both construction and operation stage. The allocation of 20,000sqm now names five sites over which this will be delivered and the SA considers this is more likely to result in development being brought forward than with previous iterations of the policy where only two sites were anticipated (and not named).</p> <p>Strategic Allocations C1 and C3 are also both proposing mixed use development with a number of residential and are therefore not considered to have a negative impact on housing land supply.</p> <p>The IMD2010 shows employment deprivation to be an issue in some LSOA within the Ste Peters and North Laine ward and increased employment opportunities locally could help to reduce deprivation in this domain. The SA notes that the policy now includes a specific requirement to provide training for local people, which would potentially help to reduce employment-based deprivation.</p>	++	++	++
12) Support economic development	Direct impact. As with Objective 11, the policy would have a significant positive impact on supporting economic development, particularly in the medium to long term. Various sectors should benefit, including the retail sector, including small independent traders through a variety of improvements including streetscape and public realm improvements thus improving the attractiveness of the area to shoppers, as well as the increased retail provision, and the creative digital and information technology industries cluster located in	++	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	this area through provision of affordable and appropriate workspace, and particularly through the allocation of New England House. An increase in local population, caused by an increase in housing numbers is also likely to support economic development in the area.			
13) Improve health	<p>Direct impact. There should be a range of positive implications for health resulting from delivery of this policy, due to the provision of housing and employment, both of which are wider determinants of health, as well as through improved access to services through increased retail provision. Improvements to the public realm and townscape and overall appearance of the area will contribute towards improved well-being and provision of training could help improve employment prospects for local people.</p> <p>However, air quality is an issue in this area, particularly around the London Road corridor and any increase in traffic resulting from delivery of the policy would have implications for health, including the impact of noise on health. It is noted that the policy includes the requirement to ensure developments do not increase the number of people exposed to poor air quality or traffic noise which is welcomed, however the impact of increased traffic on air quality, noise and health remains a concern. One LSOA situated within the St Peters & North Laine ward ranked in the most 2.4% deprived in the UK (domain of health) and this should be monitored.</p>	+	-/+	-/+
14) Integrate health and community safety	<p>Indirect impact. The policy does not directly reference community safety, despite crime scoring highly in the IMD 2010. The Local Action Team for the area identifies a range of anti-social behaviour as being prevalent in the area, including street-drinking and drug use. New developments, particularly those of a mixed use nature, should help to increase natural surveillance, and any general improvements to the area are likely to lead to an increase in footfall, both of which can contribute to improving community safety. Improvements to public realm, pedestrian routes and cycle routes, should help to improve road safety, which is an issue in this area, particularly around the Preston Circus junction.</p>	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Indirect impact. The area is situated within the wards of St Peters and North Laine and Preston Park. The IMD 2010 shows that there are LSOA within the St Peters and North Laine ward (E01016964) within the Development Area that have significant levels of deprivation in certain domains, including income deprivation facing older people, employment, living environment, crime, health and employment, all of which fall within the 10% most deprived in the UK and much higher in some cases. The LSOA score for outdoors living environment is the worst in the city (measured by air quality and road traffic accidents).</p> <p>The shopping area in particular is likely to be the shopping destination for people from a variety of differing neighbourhoods, with different shopping needs, including those from the more affluent Preston Park ward, and those from the Mouslecoomb, Bevendean and Tarnar areas, as well as from within the area itself. It is important that any improvements</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	to the retail on offer continues to meet these needs in order to contribute towards reducing deprivation. The policy could help to reduce deprivation, particularly in the domains of the living environment and employment, and should make some contribution to improving health and reducing crime, as described in (13) and (14) above.			
16) Engage local communities	There is significant opportunity for community engagement through delivery of this policy.	+	+	+
17) Make the best of previously developed land	Direct impact. All of the Strategic Allocations and much of the development area is situated on previously developed land, therefore the policy provides the opportunity to maximise use of PDL, particularly existing under-utilised sites.	+	+	+
18) Sustainable energy	Direct impact. Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the new policy requirement for heat network infrastructure, based on the findings of the Energy Study, in addition to government requirements from 2016/2019 should ensure the impacts of the policy are positive, with this expected to be significantly positive in the longer term.	+	+	++
19) Taking account of the changing climate	Indirect impact. The area is away from the coastal frontage, therefore is not at risk of coastal flooding, however parts may be at risk to surface water flooding, which could increase as a result of climate change. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. CP8 requires all development to be able to respond to changing needs.	-	-	-
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no specific reference for development within the area to meet specific standards. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-
21) Increasing accessibility	Direct impact. The policy should have a positive impact on this objective. The policy will result in a variety of developments and infrastructure, including housing and employment opportunities, as well as an increase in the retail offer, thereby increasing provision and access. In particular, links between the development area and the North Laine will be improved, helping to link the area with central Brighton, and links between existing open space and new greenways will also be improved.	+	++	++
22) Reduction of waste	Indirect impact. Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised at source.	-	-	-

Policy DA5: Eastern Road and Edward Street

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impacts. One of the key local priorities of the policy is to enhance urban biodiversity throughout the area, which is likely to have a positive impact on this objective, including a specific reference to increasing tree planting. The policy is concerned with new development, the majority of which will take place over the strategic sites, none of which are situated in close proximity to any SNCIs or adopted greenway. Development is therefore considered to provide the opportunity to enhance biodiversity throughout the area.</p> <p>In addition, CP8 and CP10 should also ensure effect of new development is positive and enhances biodiversity.</p>	+	+	+
2) Improve air quality	<p>Direct impact. The DA was chosen due to its location on a sustainable transport corridor, therefore having good access to public transport. There are a number of measures contained within the policy that should help to improve local air quality including: promotion and investment in sustainable transport, transfer of road carriageway, improvements to public realm, and infrastructure to allow the introduction of a rapid bus service. In addition, improving air quality is one of the area's local priorities.</p> <p>The strategic allocations are also required to provide improvements to sustainable transport infrastructure and the re-development of the RSCH will involve a transport feasibility study, which will consider reducing and re-routing traffic along Eastern Road, which may lead to improvements in local air quality, although may simply displace traffic and its associated issues and this will need to be investigated as part of the study. The requirement for this work to be completed prior to the completion of the hospital development, which secured planning permission in 2013, may mean that the impacts are evident in the short-medium term, however as development has not yet commenced, nor the feasibility study carried out, then this remains unknown.</p> <p>Much of this area has reasonably good air quality and the majority of this transport corridor is quite wide which aids dispersal. Exceptions are opposite the hospital on Eastern Road where concentrations remain above the limit value for NO₂ however the entire area remains within the AQMA 2013.</p> <p>Despite the positive measures outlined in the policy, there is a risk that air quality could worsen, either as a result an increase in private motor vehicles that could be associated with residential development in the area, or from people travelling to/from the area for employment purposes or to access hospital facilities.</p>	-	-	-
3) Maintain local distinctiveness	<p>Direct impact. The area along Edward Street and Eastern Road comprises different sections with varying characteristics. The policy will seek to improve the public realm and townscape and seeks to ensure development will respect the diverse character of an area and preserve buildings of historical interest. There are a number of Conservation Areas located throughout or adjacent to the area and the strategic sites, including Valley</p>	+	+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>Gardens, East Cliff and College Conservation Areas. The policy refers to the fact that the area contains various heritage assets and the SA notes that all the Strategic Allocations require either the existing townscape or historic built environment to be considered in the design of development.</p> <p>One of the local priorities for the area is to invest in open space. Currently, existing open space does not meet existing needs in the Queens Park ward across the majority of typologies and this is likely to worsen with any increase in population locally, reflecting the mixed negative and positive impacts in the long term. This should be addressed through CP16.</p>			
4) Protect South Downs	There is not considered to be any direct impact on this objective.			
5) Provide decent, affordable housing	<p>Direct impact. The policy states that a minimum of 515 residential units will be delivered in the area over the plan period, which is slightly more than the previous iteration of the policy and reflects updates to the SHLAA and viability evidence. The majority of this housing is anticipated to come forward across the strategic allocations, with the housing at the Gala Bingo Hall site considered likely to come forward in the short term. This will include a proportion of affordable units, therefore having a positive impact on this objective. In addition, the delivery of rooms for students will have positive implications in relation to provision of student accommodation, as well as having indirect impacts on existing housing stock, e.g. through less need to rely on HMOs for student accommodation.</p>	++	++	++
6) Reduce amount of car journeys	<p>Direct impact. It is recognised that the policy contains a number of positive measures: the DA was chosen due to its location on a sustainable transport corridor, therefore having good access to public transport; and the policy proposes improvements to public realm, promotion and investment in sustainable transport (including walking and cycling) as well as ensuring infrastructure is in place for a rapid bus-based scheme in the long term. In addition, the policy suggests road carriageway transfer to sustainable forms of transport and requires a study into the feasibility of reducing and re-routing traffic along Eastern Road to be carried out, in conjunction with the strategic allocation of the RSCH. This may have some benefits locally, regarding reduced congestion, however may simply displace traffic.</p> <p>However, the policy includes a variety of different types of developments, all of which are likely to put increased pressure on transport infrastructure available, or may result in an increase in people travelling to the area, or increase car ownership in the local area (associated with residential development). In addition, the status of RSCH as a sub-regional destination for hospital services may increase car or other journeys into Brighton further. The impact is considered to be more significant in the medium term, becoming less significant in the long term due to anticipated delivery of the rapid transport scheme. Increased car journeys would also lead to an increase in noise levels produced by road traffic which have already been measured as between 65-69.9 decibels along the</p>	-	--	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>roadside in this area (DEFRA noise mapping), as well as potentially having other health and safety implications.</p> <p>The cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures, including promoting car free or low car housing.</p>			
7) Minimise risk of pollution to water	<p>Indirect impacts. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city. Contaminants in the soil can be disturbed during construction, which can leach into groundwater and would need to be investigated as part of the planning process.</p> <p>The development area mainly consists of urbanised areas. Any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, a problem in itself, and can lead to pollution of groundwater. The SFRA 2012 shows that parts of the area are at risk of surface water flooding in both the 1 in 30 and 1 in 200 year event. The area around the Circus Street site is more susceptible (deeper water) to surface water flooding in the 1 in 200 year event. The area around Freshfield Road and Stevenson Road are shown to have an intermediate susceptibility to surface water flooding. The remainder of the area is not susceptible to surface water flooding.</p> <p>The SA notes that the supporting text refers to the SFRA findings for the area and requires developments to demonstrate sequential planning.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk and flood risk should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>	-	-	-
8) Minimise use of water	<p>Indirect impacts. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>CP8 and SPD08 should ensure that water consumption is minimised.</p>	-	-	-
9) Promote development of contaminated land	<p>Direct impacts. The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage.</p>	+	+	+
10) Manage coastal defences	<p>There is no direct link with this objective.</p>			
11) Employment: balance needs of tourists, residents and businesses	<p>Direct impacts. The policy is likely to have a significant positive impact on this objective over the plan period as the policy includes delivery of a range of 18,200 to 23,200sqm of employment floorspace over the Amex and Circus Street sites, some of which will be</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>affordable workspace, a Dance Studio and 74,000sqm of hospital floorspace, as well as additional ancillary uses, including retail. All will generate employment opportunities both at construction and operation stage. The SA has amended the score between Submission City Plan and this Addendum stage and removed the uncertain impact, as it considers the policy to be positive and not uncertain with regards to the creation of employment opportunities. It is understood from the Employment Land Study Update that the Freshfield Road Business Park is currently well-used and the SA notes the change to this strategic allocation which suggests the employment element of this site is considered likely to come forward in the longer term.</p> <p>The policy is now more likely to have a positive impact on residents, with creating employment opportunities for local communities one of the local priorities. In addition, all strategic allocations are required to secure training for local people.</p> <p>The SA notes that a large amount of employment floorspace will be required to meet the future needs of the city, and that the reduction in this location will need to be addressed through allocations elsewhere.</p>			
12) Support economic development	<p>Direct impacts. As with 11 above, the policy is likely to have a significant positive impact on this objective in the medium to long term, with the policy delivering a large amount of additional employment floorspace, or floorspace that will have positive impacts for the local economy. Positive aspects of this policy include the benefit for other sectors, with tourism and hospitality sectors benefitting from improved access between the area and the seafront. The delivery of a dance studio, as well as affordable managed workspace will be of benefit to the creative industries sector.</p>	+	++	++
13) Improve health	<p>Indirect impacts. On balance, there should be more positive implications for health resulting from delivery of this policy in the short and medium term. This is due to the provision of housing and employment, both of which are wider determinants of health. In addition, the provision of additional facilities at the RSCH and the provision of a new GP surgery will also have benefits in terms of access to health facilities. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being and would also support more sustainable travel, having wider benefits for health.</p> <p>However, should the policy result in an increase in traffic to or within the local area in the longer term, then this would have negative implications for health, including health impacts resulting from air quality, noise or safety. In addition, the re-routing of traffic from Eastern Road to alternative routes could have a negative impact on surrounding communities if the existing problem is simply displaced, rather than traffic reduced and this will need to be assessed as part of any feasibility study. This may occur in the short/medium term due to the requirement for implementation prior to completion of the hospital development, should the feasibility study prove positive.</p>	+	-/+	-/+
14) Integrate health and	<p>Direct impact. According to the IMD2010, crime based deprivation is the 2nd worst in the</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
community safety	city, in one of the LSOAs that is located within the Development Area. Improving community safety is a key priority for the area. In addition, the creation of active frontages can have a positive impact on crime reduction and community safety.			
15) Narrow the gap between deprived areas and rest of the city	<p>Indirect impact. There are three areas that were designated as neighbourhood renewal areas that are situated adjacent to the development area; Bristol Estate, Queens Park & Craven Vale, and Tarnar, all of which have varying priorities and some significant levels of deprivation. The policy should help in tackling issues that have been identified as priorities within the Neighbourhood Action Plans including, tackling community safety, provision of community facilities, and lack of activities for children/young people. The development area is mainly situated within the Queens Park ward, which has significant levels of deprivation across various domains. Seven of the nine LSOAs that make up Queens Park ward fall within the boundary of the Development Area and six of these fall within the most 20% deprived LSOAs in the UK. However, more significant is the fact that two of the LSOAs are ranked as 2nd and 3rd most deprived in the city, (overall domain) and the most deprived in the city in the domains of employment and health.</p> <p>The policy is likely to have a positive impact on narrowing the gap and reduce inequalities through a variety of infrastructure that will be delivered or improved through implementation of the policy, e.g. community building, GPs practice, youth facilities and additional school floorspace. All of these will be needed to meet the needs of the predicted increase in population resulting from increased housing in the area as well as meeting existing needs. In addition, the policy recognises that training opportunities must be created for local people, particularly in relation to the strategic developments, which again should help reduce deprivation through improving skills and job opportunities. There may also be opportunities to reduce fuel poverty, through implementation of district heating, which could benefit people throughout the local area.</p>	+	+	+
16) Engage local communities	Indirect impact. There is significant opportunity for engagement of the community through delivery of this policy, particularly due to the range of community infrastructure that is planned to be delivered.	+	+	+
17) Make the best of previously developed land	All of the sites identified within the policy are areas of previously developed land. The policy makes specific reference to using the land at Freshfield Business Park more efficiently. The SA notes that higher density levels in relation to housing are expected to be delivered within Development Areas, which again should make more efficient use of land.	+	+	++
18) Sustainable energy	Direct impact. Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the SA recognises that policy contains a specific requirement to implementing district heating in the area, resulting from the findings of the Energy Study, and this should help ensure	+	+	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	that sustainable energy systems are delivered, having wider benefits, resulting in the significant positive impact in the long term. In addition, the requirements of CP8 and government targets for new homes to be zero carbon by 2016 and non residential development to be zero carbon by 2019 should ensure the impact is also positive.			
19) Taking account of the changing climate	Indirect impact. The area is away from the coastal frontage, therefore is not at risk of coastal flooding, however parts may be at risk to surface water flooding, which could increase as a result of climate change. The policy should lead to additional green infrastructure, including substantial tree planting, which will help the city adapt to climate change, through contributing to reducing the urban heat island effect. Therefore a mixed impact is considered likely. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. However, CP8 requires all development to be able to respond to changing needs.	-/+	-/+	-/+
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no specific reference for development within the area to meet specific standards, including the strategic allocation. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-
21) Increasing accessibility	Direct impact. The policy should have a positive impact on this objective. The Development Area is focused on a sustainable transport corridor, to which improvements will be made through implementation of the policy, which will improve access to services. In addition, the policy will also result in a variety of developments and infrastructure, including healthcare provision, a community building, housing and employment opportunities, and ancillary shops and services thereby increasing provision and access.	+	++	++
22) Reduction of waste	Indirect impact. Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy DA6: Hove Station area

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Indirect impact. In general, the development area itself is currently lacking in biodiversity therefore the issue that development could have a negative impact on existing biodiversity is not considered to be of significance. Further development could lead to enhancements in biodiversity, should new developments incorporate features that attract biodiversity, and the policy now makes a specific requirement to improve biodiversity. In particular, any new biodiversity could link with existing areas of open space, including Hove Park, situated to the north of the development area, as well as other existing biodiversity that surrounds the development area. CP10 sets out the requirements in terms of provision of biodiversity features in new development.</p>		+	+
2) Improve air quality	<p>Direct impact. The SA recognises that the development area is located around good sustainable transport links, and that it also contains proposals for mixed-use development therefore potentially reducing the need to travel by car. In addition, one of the policy priorities is to enhance the sustainable transport interchange by improving the cycling and walking network and strengthening north/south and east/west connections. The supporting text now also requires development to take account of air quality impacts and provide improvements to or mitigate impacts.</p> <p>Some of the area lies within the AQMA 2013. Several junctions in the area are at or near to capacity so any additional traffic associated with this level of development is likely to add to congestion and air quality problems. Although DA6 is not considered to be a worst case location for air quality in the city, any proposals for residential development within 15m of the road carriageway should consider the health impacts of air quality on residents. The additional amounts of development anticipated to be delivered in this location are likely to add to existing air quality issues around the area.</p>		-	-
3) Maintain local distinctiveness	<p>Direct impact. Hove Station is situated within the Hove Station Conservation Area, with Hove Station itself being of Grade II listed status. However the remaining area within the development area is mainly modern industrial. The policy specifically requires development to be of high quality design and be acceptable height and mass and is likely to lead to improvements to the public realm and townscape, leading to an overall improvement in local distinctiveness. The area is considered appropriate for mid-rise buildings and care must be taken not to have an adverse impact on adjacent conservation areas and buildings of historic interest. This should be addressed under CP12/13.</p> <p>Although there are no existing areas of open space within the development area itself, the development area is within the 720m buffer of most typologies of open space, as outlined in the Open Space Sports and Recreation Study 2009, and has Hove Park and Hove Recreation Ground situated to the north. The policy also requires public open space to be provided in the area. In addition, CP16 should ensure that the open space</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	requirements of future residents can be met locally.			
4) Protect South Downs	No impact. Development within the built up boundary of the city is unlikely to have an impact on the South Downs, although medium rise buildings could impact on views of or from the Downs.			
5) Provide decent, affordable housing	The policy is likely to have a significant positive impact on this objective, with the policy and SHLAA identifying the potential to build 525 units within the development area over the plan period, a proportion of which would be affordable. It is noted that this is a reduction from the previous iteration of the policy, however this amount of housing in this area is still considered to be a significant contribution.		++	++
6) Reduce amount of car journeys	Also see objective 2. The policy contains a range of priorities which could lead to a reduction in the need to travel by car: the Development Area was chosen due to its proximity to modes of sustainable transport; proposed enhancements to the transport interchange through improvements to cycling and walking networks, improved access to the station, as well as improvements to the public realm; and the encouragement of mixed use developments in appropriate locations. However, the policy is concerned with a significant amount of new development (residential and employment) and this may lead to an increase either in car ownership in the area or journeys to/from the area for employment purposes, leading to an increase in congestion. There are already high levels of congestion in the area, with associated impacts on air quality, as well as increasing noise associated with road traffic which is already high at key junctions in this area (70-74.9+ decibels at Sackville Road/Shoreham Road junction). Proximity to the railway station and various bus routes, makes this area ideal for low or car-free housing and the SA welcomes the reference in the supporting text specifying that development will have to justify any proposals for parking, given its location. The cross-cutting policy on sustainable transport should mitigate against the potential negative impacts of this policy, through aiming to achieve a modal shift and reduction in car use.		-	-
7) Minimise risk of pollution to water	Indirect impact. The SA considers the impacts on this objective to be positive. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city and must be protected under the requirements of the Water Framework Directive. The SA recognises that the policy now specifically seeks the protection of groundwater and this is considered to bring about positive impacts. The development area mainly consists of urbanised areas and any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, which can lead to pollution of groundwater. However, the SA recognises that the policy also requires development to address surface water flooding risks and incorporate surface water drainage measures. The SFRA 2012 shows that the site is at risk of deeper surface water flooding in both the 1 in 30 and 1 in 200 year event, with the area around Goldstone Retail Park particularly	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>susceptible. There is a major surface water flood path which flows along Goldstone Retail Park down to Conway Street and any development must ensure that this flow path is maintained to reduce the risk of flood risk elsewhere. Development should be sequentially planned in areas known to be at risk of flooding and SUDS should be built into any new design.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>			
8) Minimise use of water	<p>Indirect impact. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>CP8 and SPD08 should ensure that water consumption is minimised.</p>	-	-	-
9) Promote development of contaminated land	<p>Direct impact. The policy is likely to have a positive impact on this objective as the development area contains pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage.</p>	+	+	+
10) Manage coastal defences	<p>There is no direct link with this objective.</p>			
11) Employment: balance needs of tourists, residents and businesses	<p>Direct impact. The impact is likely to be significantly positive on this objective in the long term, with key aims of the policy to secure and create a high quality employment focussed mixed use area. However, the SA notes that the policy allows a net loss in employment floorspace on the strategic allocation, through the retention/replacement of only 12,000sqm on Conway Street (compared to 18,700sqm existing) and therefore in the development area as a whole. This is not considered to bring about negative impacts on this objective as it is understood that higher value or greater jobs density is anticipated from new employment generating floorspace to be delivered, particularly on the Conway Street site, however has led to the positive impact being uncertain. The policy specifies that any loss should be minimised, which should help retain as much employment floorspace as possible. The policy now seeks to create employment and training opportunities for local people, which should bring about positive outcomes locally.</p>	+?	+?	++?
12) Support economic development	<p>See objective 11. The impact is likely to be significantly positive on this objective in long term, with the regeneration of the existing employment opportunities in the area to help contribute to provide for the city's needs and this will help support the local economy, however, as described under 11, the reduction and loss in floorspace to be delivered locally makes the impact more uncertain. Positive aspects of the policy include: the support for various sectors of the economy, with particular reference to meeting the</p>	+?	+?	++?

SA Objective	Summary of effects	Short term	Medium term	Long term
	requirements of small businesses, creative industries and digital media, in terms of provision of appropriate, affordable workspace, which will help to meet their needs and recognises that Hove is an attractive location for businesses in the city. In addition, any increase in different types of development in the area is likely to have added benefits for existing surrounding businesses, e.g. through increased footfall.			
13) Improve health	The policy is likely to lead to a number of improvements which will have a positive impact on health including: provision of employment and training opportunities, and provision of housing, both of which are wider determinants of health; improved townscape which has associated impacts on general well-being; improved cycling and walking networks which may encourage a reduction in car-use and congestion, and may encourage physical activity. In addition, provision of community facilities, such as schools and sports, will help to develop sustainable communities, impacting on community health. However, as described under objective 2 and 6, the policy may lead to an increase in road traffic, with potential impacts on air quality as well as increased noise levels, having associated negative impacts on health. This is considered to be more likely in the longer term. There are two LSOA that cover the majority of the area of DA6, 1 in Goldsmid and 1 in Stanford, with two further LSOAs bordering the area. The LSOA situated in Goldsmid is located within the 5% most deprived in the UK under the health domain, with scores of 4.6%. Changes to this score over time may reflect impacts of the policy.	+	+	-/+
14) Integrate health and community safety	Direct impact. According to the IMD2010 crime is not a particular issue in the area, with the highest scoring LSOA being 55.7%, although the NAP for the Portland Road and Clarendon NRA identified the area around Conway Street as having community safety issues. The policy is likely to lead to improvements in community safety, with specific reference to securing public safety improvements. In addition, mixed use developments increase natural surveillance through increased footfall at different times of the day, therefore also leading to improved community safety.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The Clarendon area, which forms part of the Portland Road and Clarendon Neighbourhood Renewal Area, is situated within the Development Area. The Neighbourhood Action Plan for this area identifies anti-social behaviour, traffic management and poor quality streetscape as issues. The policy makes reference to these issues and seeks to ensure that any new development will contribute towards public safety improvements. The Development Area is located within the Goldsmid and Stanford Wards which overall do not contain any significant levels of deprivation, however contains pockets of deprivation particularly located around the Clarendon area. The LSOA covering this area are found to be in the most 20% deprived (UK) in the domains for employment (14.2%), income deprivation facing older people (5.9%), health (4.6%), and living environment (4.3%). The policy could help to lead to improvements in some of these areas including	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	employment through the policy requirement, which may impact on health and deprivation.			
16) Engage local communities	There are significant opportunities to engage the local community through implementation of this policy.	+	+	+
17) Make the best of previously developed land	Direct impact. All of the development area is situated on previously developed land. The policy is likely to lead to a significant positive impact on this objective, with the policy making specific reference to making more efficient use of under-utilised sites, and although the policy accepts a loss of employment floorspace, it is understood that this is to be replaced by higher value or greater job density. In addition, the area has been identified as having potential for tall buildings, with the policy making specific reference to mid-rise buildings being appropriate in this location. This will also help to increase the capacity of available land space.	+	++	++
18) Sustainable energy	Direct impact. Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the policy now requires development in this area to consider low and zero decentralised energy, such as heat networks, and this is considered to have positive impacts on this objective. In addition, government targets for all new residential to be zero carbon by 2016 and non-residential to be zero carbon by 2019 should ensure the impact is positive in the medium to long term. CP8 requires all new residential development (major development) to achieve zero carbon status, as well as requiring various standards in either CSH or BREEAM depending on the type of development.	+	+	+
19) Taking account of the changing climate	Direct impact. The area is away from the coastal frontage, therefore is not at risk of coastal flooding, however parts may be at risk to surface water flooding, which could increase as a result of climate change. The SA notes that the policy now requires development to address surface water flooding risks and is therefore considered to be more positive against this objective. However, new development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, and could also exacerbate the urban heat island effect. CP8 requires all development to be able to respond to changing needs.	-/+	-/+	-/+
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no specific reference for development within the area to meet specific standards. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
21) Increasing accessibility	Direct impact. The policy is likely to have a positive impact on this objective, becoming significant in the long term through improvements to the walking/cycling network, improvements to access to Hove Park, Hove Station and the surrounding transport interchange, and through the increase in employment opportunities in the area.	+	++	++
22) Reduction of waste	Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised. The SA recognises the safeguarding of the waste management site to meet the future waste management needs of the city.	-	-	-

DA7 Toads Hole Valley

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The policy involves development on a Greenfield site, Toads Hole Valley which is situated to the north of the city. There is a designated SNCI to the western edge of the site. The loss of any Greenfield site has potential to have adverse impacts on biodiversity, the significance of which can only be determined once an assessment of the ecological value of the site has taken place. When deciding on removing the site from the SDNP, the Inspectors Report of the Inquiry into the proposed SDNP (2008)⁶ refers to a survey that stated the site is devoid of ecological interest, however this information may be out of date and a further study would be needed to clarify this.</p> <p>The SNCI was originally designated in 1995 and in 1999 a site survey described the site as “an important site for habitat diversity with scrub, woodland, rough grassland and a pond”.⁷ Although the SNCI will remain protected, development adjacent to it may impact on the value of the designated area, however it is recognised that the policy specifically refers to retaining and enhancing the designated SNCI.</p> <p>Overall, the impact of the policy is considered to be negative uncertain. The SA recognises that development is likely to provide the opportunity to enhance biodiversity through incorporation of various features, and will provide the opportunity to enhance the Toads Hole Valley SNCI, however until the ecological state of the site has been reviewed this remains uncertain and the risk of negative impact remains.</p>		-?	-?
2) Improve air quality	<p>The policy incorporates delivery of housing, as well as other uses and a large site for future employment uses. The site is currently well served by the existing road network and this could impact on choices made regarding car ownership/journey mode. Delivery of housing is likely to increase car ownership in the local area, however it is recognised that the policy commits the parking on site to be guided by maximum parking standards and also requires a new public transport service to serve the development. Once operational, the delivery of employment floorspace will increase journeys made to the area for work, therefore also potentially having a negative impact on localised air quality. It is recognised that the site is situated outside the existing AQMA meaning that development in this location is unlikely to increase the amount of people exposed to poor air quality and although the site is adjacent to the A27, traffic flow on this road is normally good and the nature of the landscape ensures that air pollutants are readily dispersed. It is recognised that the policy requires sustainable transport links to be improved to the</p>		-	-

⁶ <http://archive.defra.gov.uk/rural/national-parks/south-downs/key-docs.htm>

⁷ **Brighton & Hove SNCI Site Summary Sheet – Toads Hole Valley 1999**

SA Objective	Summary of effects	Short term	Medium term	Long term
	area, however the SA considers that air quality in this area, or at junctions around this area will worsen as a result of this amount of development in this area. In addition, the potential for the employment site to be an informal site for park and ride may increase potential for adverse air quality impacts at certain times.			
3) Maintain local distinctiveness and sites	<p>The policy is considered unlikely to have any adverse impacts on the historic built environment, including the adjacent Conservation Area of Woodland Drive. The density levels set by the policy are higher than those in neighbouring wards, which vary from approximately 10 to 30 dph, however it is recognised that higher density levels will need to be achieved to accommodate the required development, and that density of between 50 to 75dph is still likely to be of low-rise and is lower than other development area policies.</p> <p>The policy should bring about positive benefits in relation to provision of open space, with the policy specifically requiring that children’s play facilities, recreational space and allotments are provided for all of which were identified as being deficient in this area by the Open Space Study Update 2011. In addition, the site has suffered from illegal use by motor-cross bikes and the habitat has remained un-managed for a number of years, impacting on the landscape value of the site itself ⁸</p> <p>The potential impacts on the SNCI are discussed under objective 1, and the potential impacts on the SDNP are discussed under objective 4.</p>		+	+
4) Protect South Downs	<p>Local Priority A3 and guidance point C1d for the strategic allocation both refer to the SDNP. These points should seek to ensure that the setting of the SDNP is respected by development, and that development has regard to the purpose of the SDNP, which should ensure the conservation of its intrinsic beauty and to promote understanding and enjoyment of it. These points are welcomed by the SA. In addition, the density range set by the policy should ensure that views of or from the SDNP are not harmed. The policy now “seeks” to improve links to the National Park and although this is not considered to be as strong as the previous policy, this is not considered to alter the score significantly against this objective. The SA considers the policy to incorporate protection of the SDNP and its setting and is therefore considered to be positive, however remains uncertain until an impact assessment of development proposals has taken place, and this should be required at various stages of the development process.</p>		+?	+?
5) Provide decent, affordable housing	<p>The policy should bring about significant positive benefits for this objective. The policy will result in the delivery of a minimum of 700 residential units, a proportion of which would be affordable. In addition, the policy specifies that at least 50% of housing delivered across the scheme will 3 or more bedroomed properties, which will contribute to helping to address the need for family housing.</p>		++	++

⁸ Site Appraisal for Park & Ride, Peter Brett Associates, 2004

SA Objective	Summary of effects	Short term	Medium term	Long term
6) Reduce amount of car journeys	<p>As described under objective 2, car ownership and car journeys to/from the site are considered likely to increase as a result of this policy, as a result of the significant amount of development delivered having a negative impact on this objective. This is due to the sites' relatively good access to the existing road network, yet lack of existing public transport which may impact on choices over car ownership or travel choice. Previous travel trends seem to indicate this, with the census (2001) showing that over 60% of the Hangleton & Knoll households travelled to work by car, compared to 13% travelling by bus, with similar figures for the adjoining Withdean ward (56% and 10% respectively).</p> <p>Some of the positive aspirations of the policy such as improving pedestrian and cycle links to the SDNP are no longer as strong as the previous iteration, as now only contributions towards these are required. However it could be assumed that contributions will result in the same outcome in the long term. The SA also notes that the policy specifically requires the various transport, highway and safety impacts of the development be addressed through proposals and to improve the operational performance of the Devil's Dyke junction.</p>		--	--
7) Minimise risk of pollution to water	<p>The site is located within Groundwater Source Protection zone 2 (outer) which means that activities and discharges are restricted by the EA in order to protect the abstraction. It is also noted that the SFRA 2012 shows that the western edge of the site is at risk of deeper surface water flooding in the 1 in 30 and 1 in 200 year event. Greenfield sites play an important role in absorbing water. Development in this location will increase the amount of urbanised non-permeable surfacing. This could increase surface water flood risk on the site as well as elsewhere, and may lead to pollution of groundwater unless substantial SUDS are implemented. However, it is recognised that the policy specifically requires the protection of sensitive groundwater protection zones, and therefore the impact is considered to be positive.</p> <p>The specific requirement relating to surface water flood risk has been amended slightly, and now requires no increase in surface water flood risk, which is considered to be consistent with other policy requirements, and should help reduce the risk of flooding and water pollution.</p>		+	+
8) Minimise use of water	<p>Delivery of housing will increase consumption of water, as will delivery of other uses. The SA recognises that the supporting text sets out what should be achieved in ensuring the development aims to be an exemplar standard of sustainable development, and meeting requirements relating to development on Greenfield sites. This should help to ensure that water consumption is minimised through incorporation of highly efficient water saving technologies.</p>		+	+
9) Promote development of contaminated land	<p>The potential for contamination on this site is unknown and would need to be investigated further at application stage.</p>		?	?
10) Manage coastal defences	<p>The policy has no direct impact on this objective due to its location.</p>			

SA Objective	Summary of effects	Short term	Medium term	Long term
11) Employment: balance needs of tourists, residents and businesses	The policy will bring about temporary positive benefits in terms of employment opportunities at construction stage. The SA welcomes the inclusion of the policy requirement to secure training for local people, as should improve job prospects locally. The policy now only requires that a site is set aside for employment uses. The score against this objective is still considered to be positive, however not as significantly positive as previous iterations which required the delivery of actual employment floorspace.		+	+
12) Support economic development	As with objective 11, the policy should help support economic development, at both construction and operation stages. Construction based jobs will be created and service sector jobs will be created in the ancillary uses.		+	+
13) Improve health	Access to affordable housing and employment opportunities are both wider determinants of health. In addition, the policy should result in provision of open space, and should result in contributions towards the improvements of links to existing areas of open space, and should result in provision of allotments all of which will have health benefits. The policy should also help to create a balanced community, with a site set aside for a school that will also help to meet wider local needs as well as other community facilities such as a doctors surgery, again having positive impacts on the health of existing and future communities. As this is a strategic development, a Health Impact Assessment will be required and this will assess the impacts on existing communities. This should also assess the impacts of the A27 on the future community, particularly in relation to noise levels from traffic on the A27 as well as airborne pollution, and it is noted that this is now a requirement of the policy. The amendments to the parts of the policy relating to improving various access links may have some adverse health impacts, particularly children and young people whilst travelling to/from the site for education/recreation purposes, who were identified as a sensitive community in the HEQIA 2012. However it is recognised that policy point (j) still requires development to address traffic impacts, including links to adjacent residential areas. See mitigation. On balance, the positive impacts of this policy are considered to outweigh the potential negative impacts.		+	+
14) Integrate health and community safety	The policy should bring about positive benefits against this objective. Improvements to road safety in the wider area is a priority for the area In addition, new development provides the opportunity to incorporate features that design out crime.		+	+
15) Narrow the gap between deprived areas and rest of the city	The site falls within the Hangleton & Knoll ward. Several LSOAs located within this ward suffer from varying levels of deprivation under most domains. Two of the ten LSOAs situated within Hangleton & Knoll fall within the 10% most deprived SOA in the country, and the 14 th and 15 th most deprived in the city (overall deprivation). The policy now		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	requires developers to secure training for local people, which has the potential for reducing employment based deprivation. In addition, the requirement for the development to be phased ensuring that ancillary and community uses are provided alongside and not after the development, should have wider benefits for adjacent communities, through provision of additional services and reducing pressure on existing services.			
16) Engage local communities	It is likely that development in this location will incorporate widespread community consultation and engagement, which will commence prior to any development taking place.	+	+	+
17) Make the best of previously developed land	The policy will have an indirect negative impact on this objective, as involves development on a Greenfield site.		-	-
18) Maximise sustainable energy	Any increase in development will result in an increase in energy consumption. However, the SA recognises the requirements of the policy, in relation to aiming to create an exemplar sustainable development will impact on the design of the development, and the policy requirements for the development to incorporate heat networks for either current or future connection, subject to viability should result also in the impact being mainly positive. However, removal of the requirement to be zero carbon, the removal of the requirement within the policy text to meet specific high environmental building standard, and the modification that allows delivery of energy infrastructure to be subject to deliverability do now create some uncertainty over the impacts.		+?	+?
19) Taking account of the changing climate	Greenfield sites have an important role to play in helping the city adapt to climate change. They help to reduce the impact of heat island effect, as well as absorb water, and temperature and rainfall are both likely to increase as a result of climate change. Development of this site therefore may potentially contribute towards reducing the city's ability to adapt to climate change. In addition, new development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes of temperatures and weather conditions associated with climate change, although it is recognised that the supporting text requires development to adapt to climate change. It is recognised that all new development, including residential and other uses will be required to meet the requirements of CP8, which include contributing to minimising the urban heat island effect through tree-planting, which will help in adaptation to climate change and the SA notes that additional requirements were added to the supporting text following appraisal between draft plan and submission plan stage as recommended by the SA, in relation to tree planting.		-	-
20) Meet BREEAM / Code for Sustainable Homes	The main modifications to the policy have removed all references to meeting certain BREEAM or CSH standards and also weaken the requirements to provide an exemplar sustainable development. The policy and supporting text still contain a clear link to meeting requirements of CP8. The impact against this objective is		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	therefore still considered to be positive, but has reduced from significantly positive.			
21) Increasing accessibility	The strategy for development is to provide a sustainable mixed use development that will meet the needs of its residents as well as those of adjacent communities. The policy should provide housing, some employment opportunities, local amenities, including health and community facilities, as well as open space. The policy position regarding provision of access links to the SDNP area is not as strong as previous iterations, however on balance the other policy requirements around promotion of sustainable transport, in addition to the types of uses that will be provided or accommodated on site are considered to ensure the impacts on access are still positive.		+	+
22) Reduction of waste	The policy will lead to an increase in waste at both construction and operation stages. Development of the site is likely to create excavation waste, which will be encouraged to be recycled through application of Waste & Minerals Local Plan policies. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.		-	-

Policy DA8: Shoreham Harbour

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Within the Brighton & Hove area, the Basin Road South SNCI and habitats and species associated with this may be sensitive to impacts potentially arising as a result of any scheme. The wider JAAP area is regionally important for passage birds, of county importance for wintering birds and locally important for breeding birds.</p> <p>No ecological study has been carried out to determine the impacts of this scheme, and would be recommended as part of a wider Environmental Impact Assessment, particularly of land reclamation from within the Canal area if required.</p> <p>Development may provide the opportunity to enhance biodiversity, however also presents a risk as outlined above and therefore a negative uncertain impact for the medium and long term is awarded.</p>		-?	-?
2) Improve air quality	<p>Some of the development area falls within the AQMA that was designated in 2013. NO₂ levels have been modelled along certain roads in Brighton & Hove and the area that runs along the A259 carriageway between Church Road and Wharf Road exceeds the annual mean air quality objective for NO₂. Within this area, NO₂ levels at the Boundary Road/Station Road junction and the Wharf Road junction are considered likely to continue to exceed the annual mean limit value for NO₂ in future years. Pollution levels at the Wharf Road junction can be partly attributable to the volume of HGVs that use this junction to access Wharf Road, however the width of the carriageway and streetscape in this area are better for dispersion of vehicle emissions. Poor air quality is more of an issue for sensitive receptors at the Boundary Road/A259 junction and also for those situated alongside Church Road/Trafalgar Road where the carriageway is narrower and the streetscape creates a canyon effect.</p> <p>One of the priorities for Character Area 3: North Quayside/South Portslade is to develop a new access road to the South Quayside via the existing junction at Church Road/A259/Basin Road North and linking to the existing Basin Road North. This would also link to Basin Road South and would divert HGVs from the route currently used via the Wharf Road junction. This is likely to reduce the level of exceedence and improve the existing air quality around the Wharf Road/A259 junction. The SA recommends that monitoring of air quality at the three key junctions along the A259 in this area would help to ascertain the impact on air quality.</p> <p>The policy proposes certain amounts of development, including 400 residential units within the Brighton & Hove area of the Harbour, and 7,500sqm of additional employment floorspace, some of which may be used by non-port employment uses and the overall aim of the policy is to enhance the operations of the Port. This additional amount of development in the area is likely to have some impacts on number of journeys made to</p>		-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>the area and congestion, with potential for associated impacts on air quality either within the development area or on key roads within the surrounding area.</p> <p>It is presumed that the detailed JAAP policy will set out the aims in terms of sustainable transport, which may help to mitigate against this and the SA recommends that the detailed JAAP policy should seek to ensure that sensitive receptors are located away from the roadside and that any new streetscapes are designed to avoid the canyon effect.</p> <p>A negative score is awarded as although the changes to access to the port may bring about localised improvements in air quality, overall the impact is considered to be negative. The SA notes that the recommendation put forward at draft City Plan stage (May 2012) to include a reference to improving air quality for Character Area 3 – North Quayside/South Portslade has been included.</p>			
3) Maintain local distinctiveness	<p>Poorly designed or located development can have a negative impact on the historical built environment with the wider area containing a Scheduled Ancient Monument, listed buildings and is adjacent to conservation areas, all of which will need to be considered. Some of the existing townscape and public realm in the area is of poor quality and priorities for Character Areas 2 and 3 includes improving the local townscape which should lead to a positive impact on this objective.</p> <p>The policy proposes 400 residential units which will generate demand for open space. It is not known whether the full open space requirements of future residents could be met on site and this could increase the pressure on existing areas of open space situated within the western wards of Brighton & Hove, such as Vale Park, Victoria Park, Wish Park and Hove Lagoon which are all within close proximity to this part of the Development Area. The Area Priorities for character area 5 include the improvement of the quality and access of public areas, including the beaches, which are an important component of open space in this area and should also help to bring about positive impacts against this objective. The SA recommends that reference to protection of the historic built environment and provision of open space should be made, although recognises that this may be more appropriately located in the more detailed JAAP policy.</p>		+	+
4) Protect South Downs	<p>The Shoreham Harbour and Boundary Road area were both identified as areas with potential for tall buildings in the Tall Building Study (2003). Although the location of tall buildings in this location is unlikely to impact on views of the Downs, they may impact on views from the Downs, which are an important part of the National Park designation. It is unknown what height buildings may be in the area, however the AECOM Shoreham Harbour Capacity and Viability Study (2011) indicates that buildings may be up to 6 storeys in height. The SA does not consider that buildings of this height would</p>		?	?

SA Objective	Summary of effects	Short term	Medium term	Long term
	significantly impact on views from the Downs, however the SA recommends that the impact should be tested at application stage and considers the impacts to be uncertain.			
5) Provide decent, affordable housing	The policy specifies delivery of 300 residential units in the Brighton & Hove part of the Development Area which is less than previous iterations of the policy. The area is a broad location for housing, however the Area Priorities for Character Areas 2 (Aldrington Basin) and 3 (North Quayside/South Portslade) include residential/mixed use development in these areas, although there is no indication as to how this will be delivered and it is expected that this will be considered further by the JAAP. The impact is likely to be positive on this objective, with this becoming more significant in the long term.		+	++
6) Reduce amount of car journeys	There are strong east-west links throughout the area provided by the existing railway and road network, although the road network suffers from congestion. Links north-south are more constrained. Previous transport assessments have shown that there is limited capacity for the existing road network to absorb additional journeys in the area. Vehicular access to the port is heavily constrained as is restricted to a single access point. The Harbour area is a popular route for cyclists with National Cycle Route 2 passing through the Harbour, making use of the locks and is also used for pedestrian access. The SA welcomes the priority for Character Area 5 in relation to improving the PROW and the priority for Character Area 1 for improving specific roads for cycling and walking. The policy proposes certain amounts of development, including 400 residential units within the Brighton & Hove area of the Harbour, as well as 7,500sqm of additional employment floorspace. This additional amount of development in the area is likely to have some traffic impacts, either as a result of the newly located residents, from people travelling to the Harbour for work, or from increased vehicles related to a potential increase in port activity and therefore a negative score is awarded. The priority for the North Quayside/ South Portslade area to develop a new access road may help improve access to the port and improve congestion around the Kingsway/Wharf Road junction, as well as reduce volume of heavy good vehicles between this junction and the Church Road/Kingsway junction, although this would benefit from transport modelling to ascertain impacts.		-	-
7) Minimise risk of pollution to water	The SFRA 2012 shows that some areas within the site are at risk of surface water flooding in both the 1 in 30 and 1 in 200 year event. This would need to be considered when planning development. Surface water flooding can result in pollution to water resulting in a negative score against this objective. The area is also within the EA's major aquifer high vulnerability zone and consequently could be susceptible to groundwater emergence. However the SA recognises that the policy requirement to accommodate future capacity requirements relating to waste water treatment will have positive impacts on this objective. Overall the impact is therefore considered to be mixed.		-/+	-/+
8) Minimise use of water	The South East has undergone periods of high water stress therefore measures to		-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	reduce water consumption are critical. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water saving technologies.			
9) Promote development of contaminated land	The Harbour area has been subject to many phases of industry including the former Portslade Gas Works, Timber Yards, Power Stations and Coal House. These former land uses, as well as existing land uses have the potential to have caused contamination. Any development within the area has potential to remediate previously contaminated land, and therefore is likely to have a positive impact on this objective. The SA recommends that more specific wording in relation to promoting remediation of contaminated land could be contained within the detailed JAAP policy.		+	+
10) Manage coastal defences and minimise coastal erosion and coastal flooding.	The SFRA 2012 identifies that 26% of the development area is situated within flood zones 3a and 3b. In addition, the SFRA considers wave over-topping to be a significant risk in this area, and this has not been considered in the designation of the flood-zones, potentially meaning that a greater extent of the area could be at higher risk. The SFRA also found the area to be at increased risk of flooding due to climate change. The SA notes that parts of the development area are situated within flood zones 3a and 3b and therefore development situated within these areas are at high risk of flooding. The impact on this objective is therefore considered to be negative. All development proposals should carry out a site specific flood risk assessment and any development proposals for more vulnerable uses would need to pass the sequential and exception tests. The SA notes that the recommendation put forward in the previous SA of the draft City Plan (May 2012) regarding flood risk has been included.		--	--
11) Employment: balance needs of tourists, residents and businesses	Some of the LSOA located within South Portslade fall within the most 20% deprived in the UK in terms of education and skills, and also suffer from employment deprivation (IMD 2010) and the policy makes specific reference to the worsening pockets of deprivation. The policy states that 7,500sqm of additional employment floorspace will be located within the Development Area. This could be floorspace that is associated with the port-based industries, or other types of employment uses, including office space, restaurants, cafes, leisure and tourism related uses, all of which will provide employment opportunities. In addition, employment opportunities will be provide at construction stage. One of the main aims of the policy is for the Harbour to benefit existing and future communities, and it is presumed that this includes through the provision of employment opportunities and it is recommended that the JAAP policy specifies that employment opportunities will be provided for local people, particularly at construction stage.		+	++
12) Support economic development	One of the main aims for Shoreham Harbour is to maximise its potential for business and Port-users, and to enhance the operations of the Port recognising the vital role it plays in the local economy. The delivery of mixed-use developments including employment space is also one of the aims for the area. The policy should have a positive impact on		+	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>this objective through the delivery of new and improved port operational facilities, which should increase the operational use and output of the Port, through improvements to the business environment of existing non-port employers, through provision of 7500sqm additional employment floorspace (to be delivered within Brighton & Hove) for a range of uses and through the redevelopment of currently under-used spaces. In addition, the safeguarding of the wharves for minerals will also have positive impacts on economic development, with the Port being of regional importance for the landing and handling of minerals. The benefits to the local economy are likely to become more significant in the long term. The designation of the South Portslade Industrial Area as a Strategic Employment Area, potentially incorporating residential development could bring about the redevelopment of the lower-grade employment areas potentially having economic benefits and is not considered to have a negative impact on this objective. The mix of residential and employment uses in the Port may also bring about economic benefits to the nearby local centres, including the Boundary Road/Station Road District Centre.</p>			
13) Improve health	<p>Health based deprivation (measured by the IMD2010) varies widely within the South Portslade ward, ranging from being within the most 6.6% deprived LSOAs in the UK, to within the 47.1% most deprived LSOAs. The regeneration of the Harbour area to include provision of housing, employment opportunities, improved quality and access to existing open space and to other local connections and leisure opportunities should help to bring about a positive impacts, with all being wider determinants of health. However, air quality is currently an issue in this area, and air quality may worsen as a result of the traffic impacts of development, potentially bringing about negative impacts on health, and this is reflected in the mixed -/+ score. This will be dependant on where and how sensitive development is situated and could be mitigated through careful design within the Development Area, however may impact on adjacent areas that already suffer from poor air quality and that do not have the capacity to change. See ob 2.</p>		-/+	-/+
14) Integrate health and community safety	<p>There is no specific objective regarding community safety, however improvements to sustainable transport, improvements to the streetscape and public realm, and improvements to key gateway routes all have potential to bring about positive impacts.</p>		+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Two of the LSOAs within the South Portslade ward are within the most 20% deprived LSOAs in the UK (overall deprivation IMD 2010) and deprivation varies widely within the ward itself. Domains where LSOA within the South Portslade ward are in the 20% most deprived in the UK include income deprivation affecting older people, health, education & skills, children & young people, housing, and living environment. Employment (at 20.1%) is also an issue in some LSOAs. Two of the LSOA in the Wish ward are situated along the eastern edge of the Development Area, with these LSOA having most significant levels of deprivation in the wider barriers and living environment domains. Regeneration of the harbour area has potential to reduce deprivation among some of these domains as has potential to bring about benefits to the existing local community, provided that the</p>		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	needs of the existing local community are met. The SA recognises that the main aims includes bringing benefits for existing as well as future residents, as well as the fact that development plans for the harbour area are driven by worsening pockets of deprivation.			
16) Engage local communities	All LDF documents include periods of public consultation. The JAAP and accompanying SA will be subject to widespread consultation.		+	+
17) Make the best of previously developed land	The entire development area is situated on previously developed land. Some of the development area includes under-used and vacant employment sites, the value of which could be improved. It is assumed that new development, and consolidation of existing development will make better use of this land.		+	++
18) Sustainable energy	In general, an increase in development is likely to lead to an increase in energy consumption. The policy itself does not set standards, in terms of BREEAM or similar, however it is assumed that the standards set out in CP8 will apply or may be detailed further in the JAAP. As a result of the main modifications, the policy now includes the aim to maximise low and zero carbon technologies, particularly those that take advantage of the coastal location and this is considered to potentially bring about significant positive impacts in the longer term. The policy also encourages developers to consider heat network systems for current or future development, and this should also help to bring about positive impacts. In addition, government targets for all new homes to be zero carbon by 2016 and non-residential development to be zero carbon by 2019 should also help to ensure high standards in terms of energy efficiency are met and therefore overall, the policy should bring about positive benefits against this objective. Widespread re-development of existing buildings in the area also provides the opportunity to increase their energy efficiency and should be encouraged.		+	++
19) Taking account of the changing climate	The potential impacts of climate change include an increase in extreme weather events, e.g. droughts, storms and heavy rainfall, as well as predicted rises in sea level which will increase the likelihood of tidal flooding. The SFRA 2012 outlines areas which will be at risk of tidal flooding as a result of the effects of climate change and this includes areas situated within the JAAP boundary, with risks of flooding increasing with climate change. Development in this area is therefore considered to be at greater risk of the impacts of climate change, particularly coastal flooding with climate change reducing the effectiveness of the existing sea defences over time.		-	--
20) Meet BREEAM / Code for Sustainable Homes	There is no specific requirement in the policy for development to meet certain standards, however it is assumed that this will be set out in the JAAP.		-	-
21) Increasing accessibility	One of the priorities for Character Area 2 is to improve access arrangements to create better links to surrounding areas; one of the priorities for Character Area 3 is to improve connections to Boundary Road/Station Road and Church Road areas; and in addition, the priority for Character Area 5 is to improve access to the PROW corridor, beach and public areas. The policy is therefore considered to have a positive impact on this		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	objective as should improve and increase accessibility.			
22) Reduction of waste	In general, an increase in development will lead to an increase in production of waste both at construction and operation stages.		-	-

Policy SA1: The Seafront

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The policy includes development such as the King Alfred Site, the i360 Tower, proposals at Black Rock and Brighton Marina and the International Conference Centre, and therefore there is the possibility that an indirect negative impact on existing biodiversity could occur, which is of particular concern at designated sites.</p> <p>However, there are many aspects to the policy that will ensure the protection of existing biodiversity and have a directly positive impact on this objective. The policy recognises and makes reference to the importance of the natural assets found along the seafront, which have biodiversity and geological value and the need to protect them. The policy also makes specific reference to tree planting along the western seafront. The policy states that any proposal for regeneration/development should enhance biodiversity. A mixed -/+ score has been awarded to reflect the aspirations of the policy but also the risks.</p> <p>CP8 and CP10 should also help to address this risk.</p>	-/+	-/+	-/+
2) Improve air quality	<p>Direct impact. In general, despite the high volumes of traffic that use the seafront road, air quality along this route is generally better than less busy routes, due to the streetscape which aids dispersal. Although improving sustainable transport infrastructure along the seafront in order to achieve a modal shift is a priority for the whole seafront, as well as specific sections/junctions where air quality is poor, or where the National Cycle Route 2 is below national standards is likely to result in an improvement in local air quality, the policy is also concerned with some significant developments, including a minimum of 400 residential units at the King Alfred site as well as leisure facilities for the wider area, and this may worsen air quality in this area through potentially increased traffic movements. It is noted that NO2 levels at the Hove Street/Kingsway junction have been modelled and are shown to currently exceed the annual air quality objective and much of the A259 is situated within the AQMA 2013. The short term impacts are considered to be positive as development is likely to come forward in the later stages of the plan period.</p>	+	-/+	-/+
3) Maintain local distinctiveness	<p>The policy recognises the value of historic buildings located along the seafront and makes specific reference to the Conservation Areas, historic squares and lawns that adjoin the seafront. Policy likely to have a direct positive impact on maintaining the distinctiveness of these areas, with specific reference to improving the public realm, as well as ensuring that new developments are consistent with the existing scale and roofline along certain parts of the seafront and that they respect the adjoining context. The King Alfred Strategic Allocation makes specific reference to preserving and where possible enhances the settings of the three adjacent Conservation Areas and Listed Buildings, as well as enhancing strategic views, all of which will should have positive impacts on this objective. There is some uncertainty in the medium to long term of</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>the impacts generated by the fact that the housing allocation is a minimum, as this could result in adverse impacts for the local historic built environment, however overall the policy is considered to be positive towards this objective.</p> <p>The policy also recognises the value of the seafront in terms of provision of open space, with it contributing to the city's network of open space, as described in Open Space, Sports and Recreation Study 2009, and the variety of opportunities it provides.</p>			
4) Protect South Downs	Direct impact. The South Downs National Park extends down to the mean low water point in the area "East of the Marina". The policy now contains a requirement that there should be no adverse impacts on the setting of the National Park, which should help to bring about positive outcomes for this objective.	+	+	+
5) Provide decent, affordable housing	Direct impact. The King Alfred Strategic Allocation includes a minimum of 400 residential units. This should bring about significant positive impacts in the medium to long term.		++	++
6) Reduce amount of car journeys	<p>Major developments proposed for the seafront may cause an increase in road traffic unless they have appropriate and sufficient methods of sustainable transport to reach them. In addition, a minimum of 400 residential units proposed for the King Alfred site may dramatically increase car ownership and movements in this area. The "minimum" figure generates a certain amount of uncertainty, and could result in significantly adverse impacts particularly in this location. However, the SA notes that one of the priorities for the whole seafront is improving sustainable transport infrastructure in order to achieve a modal shift and has numerous other references to improving pedestrian and cycling routes, with particular reference to improving NCR2 around the Western Seafront, as well as public transport. The short term impacts are considered to be positive as development is likely to come forward in the later stages of the plan period. Impacts in the later stages are considered to be mixed.</p> <p>The measures outlined in the policy, in collaboration with CP9 should ensure that the car journeys associated with development along the seafront are reduced.</p>	+	-/+	-/+
7) Minimise risk of pollution to water	Direct positive impact on this objective as the policy will seek to minimise the risk of flooding and will actively work in partnership with agencies to ensure protection of the coastline. Development at the King Alfred site is not considered to increase the risk of surface water flooding elsewhere, nor is it in a location of surface water flood risk. In addition, the supporting text sets out a presumption against an increase in hard-surfacing, which acts positively in reducing the risk of surface water flood risk. The policy will help to meet requirements of the Water Framework Directive.	+	+	+
8) Minimise use of water	<p>Indirect impact. Any new development will increase demand for water, and therefore consumption must be minimised through incorporation of highly efficient water-saving technologies. The "minimum" figure for housing generates some uncertainty and could make this impact more adverse in the long term.</p> <p>CP8 should ensure that water consumption is minimised.</p>	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
9) Promote development of contaminated land	Some of the named sites may be contaminated. Redevelopment of the named sites may require investigation of contaminated and would result in remediation where necessary however this is unknown at this stage.	?	?	?
10) Manage coastal defences	Direct positive impact. The policy recognises the fact that the coastal frontage is considered to be at risk from tidal flooding and states that the risk of flooding will be managed through work with various agencies to maintain coastal defences. Guidance outlined in CP11 will ensure that risk of coastal flooding is minimised and that only appropriate uses/developments are sited along the seafront location. It is recognised that the King Alfred Strategic Allocation is located in a seafront location, however this is behind the existing flood defences and the SFRA 2012 does not show this site to be at present or future tidal flood risk, although there may be risk of wave over-topping. The policy specifically states that appropriate flood protection must be provided for.	+	+	+
11) Employment: balance needs of tourists, residents and businesses	Direct positive impact. Ongoing regeneration of the seafront is likely to lead to increased opportunities for employment, through an associated increase in use by residents and tourists with a number of major developments proposed for the seafront.	+	+	+
12) Support economic development	As with objective 11. In addition, replacement of facilities at the King Alfred site could increase footfall throughout this area having wider benefits, as well as supporting employment and economic development through construction.	+	+	+
13) Improve health	Overall the policy is likely to have a direct positive impact on health. The policy recognises the significance of the seafront for recreational and leisure purposes. Protection and further enhancement of the seafront is likely to have a positive impact on health, through access to open space and the associated health impacts this can have. In addition, text in the policy specifically relates to ensuring individuals needs are met (through toilets, seating, shade etc), which will increase and improve the seafront as a leisure/recreation facility. Replacement of existing sports facilities at the King Alfred site will also have positive implications for health, and development in this location will incorporate a site based health impact assessment to ensure health impacts associated with re-development are minimised and mitigated for.	+	++	++
14) Integrate health and community safety	Direct positive impact. Health and road safety should be improved through improvements to crossing facilities for pedestrians and cyclists. In addition, lighting should improve community safety along the seafront after dark.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The policy seeks to provide a "seafront for all", continuing to meet the needs of all communities. In addition, the policy now requires training places to be provided for local people in relation to the strategic allocation, which may help to improve education and employment prospects.	+	+	+
16) Engage local communities	There is no direct link with this objective			

SA Objective	Summary of effects	Short term	Medium term	Long term
17) Make the best of previously developed land	Direct positive impact. Some of the areas proposed for development are on areas of previously developed land, including the King Alfred Strategic Allocation.	+	+	+
18) Sustainable energy	New development presents the risk of increasing energy consumption. However, the policy makes specific reference to encouraging opportunities to consider small scale renewable energy provision, and also requires developments to consider heat network systems either for the current development or for future developments, and therefore the impact is considered to be positive. In addition, government targets should ensure zero carbon status is achieved for new development by 2016/2019.	+	+	+
19) Taking account of the changing climate	The policy recognises that the changing climate may have an impact on the cliffs and states that work to monitor and manage the coastline, in collaboration with other agencies will occur. In addition, opportunities to provide shade through planting will help adapt to climate change in the future.	+	+	+
20) Meet BREEAM / Code for Sustainable Homes	Indirect negative impact. New development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various BREEAM standards.	-	-	-
21) Increasing accessibility	Direct positive impact. The policy specifically refers to ensuring the seafront is accessible to all. Facilities such as toilets, shade and seating all help to increase accessibility to services. In addition, replacement of indoor and outdoor sports facilities will help to ensure continued access to these facilities.	+	+	+
22) Reduction of waste	Indirect negative impact. Construction and demolition waste likely to be associated with re-development of the King Alfred, and other key sites, in addition to increased waste at operation stage. Production of waste by visitors to the seafront is an existing issue which will continue to worsen if visitor numbers increase. Waste production is significantly higher in the summer-time, however it is recognised that the City Plan has limited ability to influence waste disposal by commercial businesses, and that this should be a wider awareness initiative. The SA notes that the policy now includes a reference to waste facilities on the seafront, which was recommended that by the SA at the previous stage of assessment.	-	-	-

Policy SA2: Central Brighton

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. The policy is unlikely to have a negative impact on this objective, due to the area that the policy relates to, and there is potential for new development to incorporate features to enhance biodiversity, although this is not stated within the policy and therefore remains uncertain. However should be met through CP8 and CP10.	+?	+?	+?
2) Improve air quality	Direct impact. Priority 7 now requires development to take into account impacts on air quality and to ensure improvements or mitigation of impacts. The policy also refers to improving the urban realm and reducing congestion. In addition, policy will seek to focus any new significant retail development and protect existing office accommodation in the central Brighton area, which is well served by existing public transport links and therefore could reduce the need to travel by car. However, it is noted that the annual mean levels of NO2 measured at monitoring locations within the SA2 area continue to be some of the highest measured in the city, show little long term improvement , and that this area is closed to private motor vehicles. The entire special area is located within the AQMA 2013. The SA recognises the positive aspects of this policy that would help to improve air quality such as an improved urban realm and requirements to improve air quality however any new development located within central Brighton could result in increased traffic, particularly with the regional retail centre located within the Special Area, either within the locality or the surrounding area, with associated air quality impacts. Impacts therefore considered to be mixed.	-/+	-/+	-/+
3) Maintain local distinctiveness	Direct impact. Policy seeks to protect historic buildings and recognises the distinct but interconnecting roles of the different areas that comprise the central Brighton area. In addition, policy point 3c will now allow a change of use from B1a office if it means that it will lead to protection of a listed building, having further positive impacts against this objective.	++	++	++
4) Protect South Downs	There is no link with this objective.			
5) Provide decent, affordable housing	Direct impact. The policy's main concern is to reinforce central Brighton's role as a centre for retail, tourism, cultural activities and commerce. However the amendment to policy point 5, which strengthens and shows support for housing above other uses such as retail, should have a positive impact on this objective.	+	+	+
6) Reduce amount of car journeys	Direct impact. Urban realm improvements could encourage pedestrian and cyclist movement within the city. Protection of office accommodation in central Brighton, whereby there is already good access to various modes of public transport, may also reduce the need to travel by car (compared with a situation, for example, where office accommodation was located outside the central area). However, it is recognised that for retail purposes, the central Brighton area is the main area that visitors wish to visit, and that the any further increase in retail floorspace could cause an increase in the numbers	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	of journeys made to the city centre unless measures to promote sustainable travel, or travel by alternative means is encouraged. The cross-cutting policy on sustainable transport should ensure that a modal shift is achieved across the city with various measures to improve and encourage sustainable travel.			
7) Minimise risk of pollution to water	Indirect impact. Any further development has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution. Groundwater resources must be protected under the requirements of the Water Framework Directive. Based on the results of the SFRA 2012, there are some areas within the Central Brighton area that are at risk of surface water flooding in a 1 in 30 year event. Areas that are at risk are predominantly located to the east of the area, around Gloucester Place, Marlborough Place, Old Steine and Pavilion. The extent increases and there are more areas that may be at risk from a 1 in 200 year event, including North Street and the SFRA recommends that a site based flood risk assessment would be required to look at all sources of flood risk and to ensure flood risk is not increased elsewhere. CP8 and CP11 should ensure that appropriate systems in place to reduce risk of surface water flooding.	-	-	-
8) Minimise use of water	Indirect impact. The policy is more concerned with protection of existing buildings and uses, however does also promote new development. Any new development will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. The policy encourages refurbishment of existing property which could include measures to reduce water consumption. CP8 should ensure that water consumption is minimised.	-	-	-
9) Promote development of contaminated land	There is no link to this objective.			
10) Manage coastal defences	There is no link to this objective. According to the SFRA 2012, the Central Brighton area is not at risk of tidal flood risk.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. The main objective of the policy is to reinforce the city's role as a regional centre and therefore seeks to support and maintain economic activity, through retail, cultural activities and tourism. In addition, the policy seeks to protect B1a office accommodation located in the Central Brighton area, although sets clear criteria for when loss will be permitted. The policy is therefore likely to support opportunities for employment in various sectors, benefiting both residents and visitors alike and specifically recognises the role and needs of small independent local traders and creative industries.	++	++	++
12) Support economic development	Direct impact. As objective 11 above. The policy point that seeks to protect existing office accommodation in central Brighton is also considered to have a positive impact on this objective, as should enable the provision of office space to meet local commercial	++	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	needs. The policy allows change of use from B1a office accommodation through application of clear criteria, if required, allowing for future flexibility. In addition, the policy specifically refers to meeting the needs of the creative industries sector in terms of provision of workspace, thus supporting their role in the local economy.			
13) Improve health	Indirect impact. There may be some positive impacts on health through improvements for pedestrians and cyclists resulting from the improvements to urban realm. However, as discussed under objectives 2 and 6, congestion and air quality could worsen as a result of additional development, particularly any significant new retail development, which will have implications for health.	-/+	-/+	-/+
14) Integrate health and community safety	Direct impact. The supporting text recognises that central Brighton, and particularly the West Street area has been identified as a violent crime hotspot. The policy seeks to improve evening/night-time community safety through the encouragement of range of evening economy users and age and social groups. This should help to improve community safety. In addition, support for residential above retail/other employment uses may help to increase natural surveillance.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	There is no link with this objective.			
16) Engage local communities	There is no link with this objective.			
17) Make the best of previously developed land	There is no direct link with this objective.			
18) Sustainable energy	Direct impact. The policy is more concerned with protection of existing buildings and uses, however does also promote new development. Any new development will increase demand for energy, and therefore must be minimised through incorporation of energy efficient design and technology. Due to the findings of the Energy Study, the central Brighton area has been found to demonstrate viability for a district heating network and the policy now expects development in this area to incorporate infrastructure to support heat networks, subject to viability. This is considered to bring about positive measures in the short and medium term, becoming more significant in the long term. The policy encourages refurbishment of existing property which could include measures to reduce energy consumption. In addition, government targets should ensure new non-residential development achieve zero carbon status by 2019.	+	+	++
19) Taking account of the changing climate	Indirect impact. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. Area not considered to be at risk to tidal flooding resulting from climate change. CP8 requires all development to be able to respond to changing needs.	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various BREEAM standards.	-	-	-
21) Increasing accessibility	Direct impact. Central Brighton is accessible by various modes of transport. Further improvements to urban realm should assist in increasing accessibility to the area.	+	+	+
22) Reduction of waste	Indirect impact. This area contains a high number of retail units, restaurants, cafes, clubs, theatres, as well as a number of commercial premises etc, all of which are likely to produce high volumes of waste. Any new development in this area is likely to lead to an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy SA4: Urban Fringe

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. One of the main objectives of the policy is promotion of urban fringe as part of the green network and encouragement of uses including biodiversity conservation, which should result in positive impacts towards this objective.</p> <p>The policy has always set out situations whereby development in the urban fringe will be permitted, such as when allocated in a DPD and when a countryside location can be justified. The policy now refers to the Urban Fringe Assessment being a material consideration in the determination of residential applications in the urban fringe, prior to Part 2 of the City Plan. The Supporting Text provides further explanation that sites identified as having potential will be go through the allocation process at Part 2, thus providing a clear signal that suitable sites are expected to be developed in the future. The wording relating to the Assessment being a material consideration indicates that some sites are anticipated to come forward prior to Part 2. Development on urban fringe sites has potential for adverse impacts on biodiversity and will be dependent on the sites developed.</p> <p>The policy requires that any adverse impacts must be minimised and appropriately mitigated, which does provide some protection, and that the wider policy objectives are met, which includes conservation of biodiversity, however overall the impacts are considered to be mixed and uncertain, could still result in a net loss of biodiversity, and will depend on the sites developed and the type of mitigation.</p>	-/+?	-/+?	-/+?
2) Improve air quality	<p>Direct impact. One of the main objectives of this policy is to secure safe access to the countryside through sustainable means. In addition, natural green space performs a natural environmental function relating to absorption of air particles and the key thrust of the policy is one of protection of the urban fringe.</p> <p>The policy and supporting text indicates that there will be opportunities for housing development occurring on sites within the urban fringe and these will be allocated in Part 2 of the City Plan. The urban fringe is sited well outside the AQMA 2013 and built up area and air quality in these locations is presumed to be good currently. If the delivery of housing is spread over a range of sites within the urban fringe, then it is unlikely that there would be any significant deterioration in localised air quality around those sites. However, there may be air quality impacts associated with the development of “clusters” as identified in the Urban Fringe Assessment and these would need consideration at planning application stage. Overall the impacts on air quality of housing in this location are considered to be negligible considering the proportion of sites considered to have development</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>potential, although could have a cumulative adverse effect when combined with the increased housing elsewhere throughout the city. Overall, the impact on air quality is considered to be positive.</p>			
3) Maintain local distinctiveness	<p>Direct impact. The urban fringe meets the NPPF definition of existing open space and represents a significant proportion of the city's open space resource. Some of the urban fringe, whether public or privately owned, makes up the city's open space provision such as allotments and playing fields as well as natural/semi-natural space, with approximately 345 hectares and 85% of the urban fringe having a designated open space function and forming part of the city's assessed standard. It also helps to maintain the character of the city setting and the setting of the SDNP. One of the main objectives of the policy is to protect the landscape role of the urban fringe and the setting of the SDNP and strategic views into and out of the city and therefore the policy has positive implications towards this objective.</p> <p>However, the policy and supporting text clearly indicates that sites with housing potential that have been identified in the Urban Fringe Study 2014 will be further tested through the site allocation process in Part 2 and will potentially form allocations for housing. Prior to Part 2, the Assessment will also be a material consideration for planning applications and this indicates that sites will be used for housing. Housing development on the urban fringe will result in a loss of open space, some of which forms the assessed quantity and will therefore have adverse impacts on this objective. It is understood that an additional 167ha of open space will need to be created to meet the future population (associated with an additional 13,200 homes). Any loss of open space will make this requirement increase and it is considered unlikely, given the competing needs for land use in the city, that these open space needs will be met. The potential for adverse impacts are considered to become more significant in the medium to long term as the population increases.</p> <p>There could be some gains in open space if privately owned sites are developed which do not currently form part of the assessed open space resource and if a scheme includes new open space, however these are unlikely to make up for the amount of public land lost, is uncertain and will depend on implementation. Overall, development in this location creates a risk of adverse impacts, particularly on open space provision, and although the policy is considered to have positive aspirations towards protecting the wider landscape role of the urban fringe and therefore meeting this objective, the risk of the loss of open space is considered to result in mixed and uncertain impacts.</p>	-/+?	-/+?	-/+?
4) Protect South Downs	<p>Direct impact. The urban fringe lies between the South Downs National Park boundary and the built up area of the city. One of the main policy objectives is to</p>	-/+?	-/+?	-/+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>protect the wider landscape role of the urban fringe and to ensure the protection of the setting of the SDNP, including strategic views in and out of the city. These requirements are considered to have positive impacts towards this objective. However, the policy clearly indicates that sites identified as suitable for residential development within the Urban Fringe Assessment will be considered further through the site allocations process in Part 2. In addition, that prior to this stage, the Urban fringe Assessment will be a material consideration for any planning application.</p> <p>This brings some certainty that residential development is likely to occur in this location. This could have adverse impacts upon landscape character and will depend upon the site developed as well as design and layout. Policy still requires proposals to have had regard to the downland landscape setting of the city and to minimise any adverse impacts, however overall the impacts are considered to be mixed and uncertain and will depend on implementation.</p>			
5) Provide decent, affordable housing	<p>Direct impact. The policy and supporting text clearly indicates that sites with housing potential identified in the Urban Fringe Assessment will go through the site allocations process in Part 2. This provides a clear indication that residential development is likely to take place in this location and is positive against this objective, helping to meet the wider housing needs of the city. In addition, housing in this location could provide much needed family type housing. The Supporting Text also refers to considering opportunities for community-led development, e.g. community land trusts and housing cooperatives, to ensure housing opportunities meet local needs, which will be positive towards this objective.</p>	+	+	+
6) Reduce amount of car journeys	<p>Direct impact. One of the main objectives of this policy is to promote access to the countryside through sustainable means, and therefore the policy has positive implications towards this objective. However, the location of housing within the urban fringe could result in adverse impacts. Some urban fringe locations do not currently benefit from regular bus services, nor are located in close proximity to other forms of sustainable transport and this may impact on travel choice and levels of car ownership, which are generally higher in the outer neighbourhoods than the city average. In addition, urban fringe locations do not currently incorporate the various services required (e.g. health, employment, education), meaning increased travel times to meet these needs. Overall the impacts are considered to be mixed and uncertain.</p>	-/+?	-/+?	-/+?
7) Minimise risk of pollution to water	<p>Direct impact. One of the policy's key objectives is to protect groundwater from pollution, through land management practices that reduce surface water runoff. In addition, land on the urban fringe has a natural role in absorption of water, protecting against surface water runoff elsewhere. This aspect of policy therefore has positive implications towards this objective. However, delivery of housing on the urban fringe will result in the</p>	-/+?	-/+?	-/+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	urbanisation of land that performs a natural function, and this could result in an increased risk of surface water flood risk, or impact on sensitive groundwater protection zones depending on their location. Mitigation is likely to reduce this risk however will depend upon implementation and the nature of the site developed. Overall the impacts pre-mitigation are therefore considered to be mixed and uncertain.			
8) Minimise use of water	There is no direct link with this objective. However residential development will increase demand for water. Environmental building standards are no longer required to be higher on Greenfield sites than sites of PDL, therefore any increase in population associated with this residential development will result in an overall increase in water consumption.	-	-	-
9) Promote development of contaminated land	There is no direct link with this objective. However there are some sites which are known to be significantly contaminated within the urban fringe, and therefore the development in this location has potential to remediate contaminated land. In addition, contamination issues may be discovered through the development process. However the impacts are uncertain until sites are allocated and further investigation takes place.	+?	+?	+?
10) Manage coastal defences	There is no link with this objective.			
11) Employment: balance needs of tourists, residents and businesses	The downland area surrounding the city is an attraction to visitors and residents. Protection of the urban fringe and wider countryside will ensure that these needs continue to be met. In addition, one of the main objectives of the policy is to create gateway facilities in connection with the SDNP to support sustainable tourism, further supporting tourism-based employment opportunities. In addition, housebuilding will create temporary employment opportunities at construction stage, in addition to increased jobs in the service sector and sectors such as education and health to meet the needs of an increased population.	+	+	+
12) Support economic development	As above. In addition, houses within the urban fringe may help to make some local businesses in outer-lying neighbourhoods more viable through increased population and footfall in these locations.	+	+	+
13) Improve health	Direct impact. There are many positive aspirations of this policy. Access to open space and wider countryside provides greater opportunities for activity which is good for physical and mental health. The policy also supports the potential use of the urban fringe for food growing purposes (e.g. allotments) which could help to improve access to fresh food. In addition, housing is one of the determinants of health. However, delivery of housing within the urban fringe would reduce urban fringe sites, potentially including those which have an existing open space function.	-/+?	-/+?	-/+?

⁹ Natural England: Health and Natural Environment, March 2012

SA Objective	Summary of effects	Short term	Medium term	Long term
	Obesity and health issues arising from inactivity are a key health issue locally. Evidence suggests that the closer a person lives to open space, the more likely they are to use it, and that green open space benefits the health of everyone, but benefits the health of the least well off the most⁹. Any reduction in urban fringe sites therefore has the potential to result in adverse health impacts for adjacent communities with the potential to increase health inequalities. Again, this will depend on the current use of the site and its location/proximity to communities and therefore also considered to be uncertain. Overall the impacts of this policy are therefore considered to be mixed and uncertain.			
14) Integrate health and community safety	There is no direct link with this objective.			
15) Narrow the gap between deprived areas and rest of the city	Delivery of housing in urban fringe locations could have positive impacts on adjacent communities, some of which may be suffering from multiple deprivation, due to the potential for employment opportunities that may be created, in addition to new housing opportunities being created which helps towards wider housing issues such as overcrowding. However, some of sites identified in the UFA with potential for housing are adjacent to communities already suffering from higher levels of deprivation than other areas of the city. Loss of open space in these locations could impact adversely on the health of adjacent communities, and may result in a widening of health inequalities and impacts adversely towards this objective. The site location will influence the impacts on this objective. Overall the impact is considered to be mixed and uncertain.	-/+?	-/+?	-/+?
16) Engage local communities	Delivery of housing within the urban fringe is likely to generate much community interest and will involve consultation with local communities.	+	+	+
17) Make the best of previously developed land	There is no direct impact on this objective. The need to locate residential development on the urban fringe does not mean that the best use of PDL has not been achieved.			
18) Sustainable energy	Indirect impact. Residential development will increase demand for energy. Environmental building standards are no longer required to be higher on Greenfield sites than sites of PDL, therefore any increase in population associated with this residential development will result in an overall increase in energy consumption	-	-	-
19) Taking account of the changing climate	Direct impact. The urban fringe plays an important role in the absorption of water as well as helping to maintain or even cool the temperature of urban environments. Periods of intense rainfall, as well as increased temperatures are anticipated with climate change. The policy therefore has positive implications towards this objective, through protection of the natural landscape form, however delivery of housing in this location, which will lead to urbanisation and loss of natural habitats may have adverse impacts	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	against this objective which would require mitigation. Overall the impacts are considered to be mixed.			
20) Meet BREEAM / Code for Sustainable Homes	There is no link to this objective.			
21) Increasing accessibility	Direct impact. The policy should help to increase accessibility to the countryside, with provision of safe public access by sustainable means one of the main priorities of the policy. Delivery of housing in the urban fringe, could include development on sites that have limited access. This could result in an overall improvement in access to other sites within the urban fringe, or to the SDNP. However, it could lead to creation of new neighbourhoods that are located away from local services and amenities, or increase pressure on existing services and amenities. Overall the impacts are considered to be mixed and uncertain and will depend on the site developed and any additional improvements or facilities/amenities that are delivered.	-/+?	-/+?	-/+?
22) Reduction of waste	There is no link to this objective.			

Nb: The SA recognises that residential development will only be permitted on those sites identified in the Urban Fringe Assessment (2014) and that any application for residential development will still be subject to the planning application process, as well as needing to meet the criteria of policy SA4. In addition, the site allocations process at Part 2 may further eliminate some sites. The sites which have been identified as having potential for residential development are those where it is considered that adverse impacts can be minimised to an acceptable level. In addition, the policy itself requires adverse impacts must be mitigated. This means that the adverse impacts identified in the SA are likely to be minimised or mitigated and may result in negligible impacts overall.

However the above assessment is based on worst-case scenario and represents the situation if mitigation did not occur.

Policy SA5: The Setting of the South Downs National Park

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. The supporting text sets out that the conservation and enhancement of biodiversity within the council's administrative area within the SDNP is a priority for the city council and that development within the setting of the SDNP must have due regard to this priority. This is likely to protect and enhance biodiversity located in the South Down National Park, particularly those that have been identified as BAP targets. The supporting text also refers to promoting the Biosphere principles, which help to promote greater understanding of biodiversity and bring people and nature together. The supporting text recognises the importance of the Downs as playing a key role in the city's green network.	+	+	+
2) Improve air quality	Indirect. A priority as outlined in the supporting text is to enhance access to the Downs by sustainable means as well as link gateway areas to a sustainable transport system and therefore may have a indirect impact on improving air quality.	+	+	+
3) Maintain local distinctiveness	Direct impact. The main emphasis of the policy is to protect and enhance the South Downs National Park, and its setting. The supporting text also sets out that the protection of historic buildings, parks and other features located within the Downs, with specific mention of scheduled ancient monuments and Stanmer Park, which is situated within the national park boundary, is a priority for the city council.	++	++	++
4) Protect South Downs	Direct impact. This is the main emphasis of the policy and is therefore considered to have a significant positive impact. The policy will lead to protection and enhancement of the South Downs National Park, and its setting.	++	++	++
5) Provide decent, affordable housing	There is no link with this objective.			
6) Reduce amount of car journeys	Indirect impact. A priority of the supporting text is to enhance access to the Downs by sustainable means and link gateway areas to a sustainable transport system. The supporting text refers to managing parking and associated traffic, particularly around gateways in order to ensure degradation of these areas does not occur. This is not considered to promote car-based travel and the correct management of parking could help to promote travel by more sustainable means.	+	+	+
7) Minimise risk of pollution to water	Indirect impact. A priority outlined in the supporting text is to protect the underlying aquifer and address any flood issues, and is therefore likely to have a positive impact on this objective.	+	+	+
8) Minimise use of water	There is no link with this objective.			
9) Promote development of contaminated land	There is no link with this objective.			

SA Objective	Summary of effects	Short term	Medium term	Long term
10) Manage coastal defences	There is no link with this objective.			
11) Employment: balance needs of tourists, residents and businesses	Indirect impact. The supporting text recognises the fact that some of the area of the South Downs National Park that falls within the Brighton & Hove administrative boundary is farmed, and the supporting text seeks to promote these, where sympathetic with wider downland objectives. In addition, the supporting text recognises the role of the Downs as a recreational asset and tourist attraction for both residents and tourists and will seek to ensure the needs of both continue to be met.	+	+	+
12) Support economic development	As above. Indirect impact. The setting of the city within the National Park adds to the attractiveness of the city to visitors and plays an important role in attracting visitors to the city. The supporting text supports the promotion of the Downs as an attraction for visitors, with specific mention of facilitating eco-tourism.	+	+	+
13) Improve health	Indirect impact. The policy is likely to have a positive impact on this objective through protection of the South Downs and its setting. Access to open space and wider countryside provides greater opportunities for activity which is good for physical and mental health. The supporting text also supports sustainable land management systems, such as healthy food production, which could help to improve access to locally grown fresh food. In addition, provision of clean water is a key public health issue, and the supporting text prioritises protection of the aquifer.	+	+	+
14) Integrate health and community safety	There is no link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	There is no link to this objective.			
16) Engage local communities	Indirect impact. One of the priorities of the supporting text is to promote Biosphere principles which aim to bring people and nature together. Work on becoming a Biosphere Reserve has involved and will continue to involve local communities.	+	+	+
17) Make the best of previously developed land	There is no direct link to this objective.			
18) Sustainable energy	There is no link to this objective.			
19) Taking account of the changing climate	There is no link to this objective.			
20) Meet BREEAM / Code for Sustainable Homes	There is no link to this objective.			
21) Increasing accessibility	Indirect impact. One of the priorities of the supporting text is to promote sustainable access to the Downs and it recognises the need to link gateway areas to sustainable transport system.	+	+	+
22) Reduction of waste	There is no link to this objective.			

Policy CP1: Housing Delivery

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The policy will result in housing development throughout the city, some of which will be at high density and some of which will be on Greenfield sites, including 1060 units on the urban fringe. Housing development anywhere in the city has potential to harm biodiversity existing on site and will be dependant on the actual site developed. However development also provides the potential to enhance biodiversity through incorporation of biodiversity features, although as a general principle, the denser the housing development the less opportunities there are for incorporating biodiversity into the design.</p> <p>It is likely that housing development located on Previously Developed Land could mitigate any negative impacts through incorporation of features to attract biodiversity, such as green roofs or green walls or through site specific design, e.g. avoidance of shading and potentially provide for net gains in biodiversity.</p> <p>Housing at DA7 Toads Hole Valley and other urban fringe sites, which are Greenfield sites has potential to have adverse impacts on biodiversity. It is understood that the urban fringe sites or parts of sites identified as having potential for housing in the Urban Fringe Assessment do not include those of highest ecological value (e.g. SACs, SSSIs). In addition, the Assessment has only identified sites or parts of sites that do not include, for example, rare species, or those designated as SNCIs. The potential for adverse impacts on biodiversity are therefore not considered to be significant, however overall, the impacts are considered to be negative and uncertain and will require mitigation.</p> <p>The Appropriate Assessment screening (2014) tested whether the amount of housing to be delivered would affect European Sites (SACs) particularly through increased recreational pressure, increased traffic and air pollution, and increased resource use, such as water. The Appropriate Assessment concludes these effects have been discounted and are not considered to effect the integrity of any European site.</p> <p>CP8 and CP10 should ensure effect of housing is positive and enhances biodiversity. Any planning application will be required to meet the requirements of SPD11 (Nature Conservation and Development), which will address impacts on biodiversity.</p>	-?	-?	-?
2) Improve air quality	<p>Delivery of 13,200 homes could result in over 11,000 more cars owned within the city (based on 0.86 cars/household, Census 2011). This amount of additional cars,</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>and associated journeys is likely to have an adverse impact on air quality. Approximately 85% of housing is located within the built-up area and this may positively influence decisions on car ownership/journey choice. However, part of the city is designated as an AQMA and location of housing within more accessible locations within the AQMA could still adversely impact upon air quality. Housing located within the urban fringe, which generally has better air quality than central areas, is currently less accessible by sustainable transport means, as identified in the Strategic Transport Assessment 2014. This could impact on travel choice, result in more journeys being made by car in the area unless public transport interventions are implemented, and may have some localised air quality impacts, although these are considered to be negligible in the wider context. This policy may also result in in-commuting, (due to less housing being delivered than needed to meet forecasted economic growth) which could also add to air quality issues.</p> <p>The Development Area policies and CP9 Sustainable Transport should ensure that the majority of development is situated within areas of good transport links, and ensure that development schemes respond to the demand for travel that they create, and implement various transport interventions to reduce less sustainable modes of transport. In addition, transport impacts of all development will be assessed at planning application stage.</p>			
3) Maintain local distinctiveness and sites	<p>The majority (85% of development) is located within the built up area. Development in this location could impact on the existing townscape, including heritage assets. However, CP12 should ensure the effect is positive and that development achieves high standards of urban design. It is assumed that tall buildings will only be built in areas that have been assessed as having potential to accommodate tall buildings and therefore won't have an adverse impact on any local sites or the character of neighbourhoods.</p> <p>Development within the urban fringe will incorporate loss of open space, some of which is publically accessible and some of which is privately owned. Development on public open space that forms part of the assessed quantity is an absolute loss of open space and goes against the recommendation of the Open Space Study. Development on private open space that was not part of the assessed quantity could result in a net gain if open space is included as part of a scheme (e.g. as with Toads Hole Valley). However, it is unlikely that this net gain in open space will outweigh the loss. The loss of open space of certain typologies (in particular Natural/Semi-Natural) in the west of the city will make it even harder to meet the locally assessed need for accessibility, as well as make it more difficult to meet Natural England's ANGst Standards.</p>	--?	--?	--?

SA Objective	Summary of effects	Short term	Medium term	Long term
	The amount of development associated with this option will increase the local population, and this creates a greater need for open space provision to meet the increased population (i.e. an additional 13,200 homes would result in 167ha of additional open space being required to meet the increased total population's needs). It is considered unlikely that the increased population's open space needs will be met due to competing land requirements.			
4) Protect South Downs	Housing development situated either within the built up area, or near the boundary of the SDNP, particularly tall buildings has potential to have an adverse impact on the views from or of the Downs. In addition, delivery of 1060 homes on sites or parts of sites across the urban fringe, in addition to those at Toads Hole Valley, could also have an adverse impact on the setting of the SDNP depending on how development is delivered. It is understood that the urban fringe sites or parts of sites identified in the Urban Fringe Assessment do not include those where a significant adverse impact on the landscape would occur. Therefore the adverse impact is not considered to be significant, however overall, the impacts are considered to be negative and uncertain. Any development located on the urban fringe would need to be of low density to ensure that any significant negative impact in terms of views from the Downs are reduced as far as possible as well as to reflect the character of the adjacent neighbourhoods, and incorporate screening where appropriate to maintain the existing landscape character.	-?	-?	-?
5) Provide decent, affordable housing	This policy will result in delivery of housing and is therefore considered to be mainly positive towards this objective. The policy will result in affordable housing and types of housing that are known to be required locally, e.g. potential for family type housing in the urban fringe location. However, the OAN has been assessed in the Sussex Coastal Assessment 2014 as a range falling between 18,000 to 24,000. Delivery of 13,200 homes is equivalent to 55% of the upper end and 73% of the lower end of the requirement. A lack of housing supply can exacerbate existing issues such as over-crowding, housing in-affordability, reduced competition in the housing market (e.g. keeps rental prices high), and reduced social mobility (e.g. young people living at home for longer and older people unable to downsize). Therefore, although 13,200 new homes is a significant increase in housing stock, overall the impacts on this objective are considered to be mixed. Ongoing negotiations through the Duty to Cooperate will be required to assist with meeting this housing need.	-/+	-/+	-/+
6) Reduce amount of car journeys	Delivery of housing is likely to result in increased levels of car ownership and potentially journeys made by car. Delivery of 13,200 homes could result in around an additional 11,000 new cars owned in the city (based on Census data of 0.86 cars per household) and an increase in trips made by car and public transport (as	-	--	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>concluded in the Strategic Transport Assessment). Delivery of housing within the built up area will enable people to make sustainable transport choices more easily, due to proximity to sustainable transport, whereas housing delivered on the urban fringe may lead to more journeys made by car due to the location and would require investment in public transport and improvements to access, as described in the Strategic Transport Assessment.</p> <p>Based on the Experian Projections of 12% economic growth, the Housing Requirements Study 2012 suggested that an increased population associated with approximately 15,000 homes would be required to meet this forecasted growth in employment. This suggests that the housing target of 13,200 homes may result in some in-commuting for employment purposes.</p> <p>It is recognised that the majority of Development Areas are located in proximity of existing public transport, therefore reducing the potential for negative impact, however should new housing incorporate provision for parking, then car use is unlikely to be discouraged and therefore strong controls on parking should be promoted where possible, including car free housing for suitably located development. Additional measures as described in the Strategic Transport Assessment will also be required to minimise the potential for adverse transport impacts from development, including that in the urban fringe, such as improved public transport, walking and cycling facilities, as well as personal travel planning and behaviour change campaigns will be required.</p> <p>CP9 should contribute towards ensuring that development is situated within areas of good transport links, and ensure that development schemes respond to the demand for travel that they create.</p>			
7) Minimise risk of pollution to water	<p>Any development has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution and will be dependant on the site developed. Currently the Water Framework Directive status of the aquifer is poor, and development could harm any improvement to this status. In addition, many sites within the city fall within either a zone 1 inner, zone 2 outer or zone 3 catchment groundwater source protection zone. The closer the activity to the source, the greater the risk of contamination.</p> <p>Development at DA7 and across sites or parts of sites within the urban fringe could have a significant negative impact, as any sites that are of a more natural form will have an important role in absorbing water as well as potentially recharging the Brighton Chalk Aquifer and this would need to be investigated further as part of development proposals. The actual impacts of development would need to be assessed on a site by site basis. CP8 and CP11 should ensure that appropriate systems are in place to reduce risk of surface water flooding. In addition, groundwater protection is addressed through SA4.</p>	-	--	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	Development on Greenfield sites should ensure surface water run-off is maintained at Greenfield rate through incorporation of features such as SUDS.			
8) Minimise use of water	Delivery of 13,200 new homes will substantially increase water consumption in the area, even with substantial measures to minimise water consumption and increasing standards relating to water consumption. CP8 should ensure that water consumption is minimised as far as possible.	-	-	-
9) Promote development of contaminated land	There is no direct link to this objective. New housing development offers the potential to remediate contaminated land, however this is uncertain.	?	?	?
10) Manage coastal defences	Coastal defences could be jeopardised through inappropriately located development and increased risk of coastal flooding could occur through development in coastal locations. Development at DA7 will have positive benefits for this objective due to its location, however overall the majority of housing will be within the built up area, with 2,240 units built within DA2 and DA8 which are situated by the coast on the coastal frontage and in areas of higher flood risk. CP11 should ensure that development is only located in appropriate locations and that site based flood risk assessments are carried out where needed.	-	-	-
11) Employment: balance needs of tourists, residents and businesses	Delivery of housing and house-building is strongly linked to economic growth with the equivalent of 2 jobs created for a year per every house built (DCLG analysis). The policy will therefore result in positive impacts through temporary construction-related jobs and permanent service-sector jobs, as well as jobs in healthcare and education and other sectors to meet the needs of an increased population. Based on Census 2011 data and a ratio of 1.15 workers (in all sectors) per household, this option could result in an increase of around 15,000 workers (across all sectors).	+	+	+
12) Support economic development	As with objective 11, temporary job creation at construction phase will benefit the local economy, as well as through jobs created through increased services required. Delivery of housing and house-building is strongly linked to economic growth.	+	+	+
13) Improve health	Access to decent, affordable housing is one of the wider determinants of health. This policy will deliver housing including affordable housing which makes a positive contribute towards meeting the city's housing requirements. However, not meeting the OAN could exacerbate existing local issues such as increased house-prices, increased inaffordability and increased rates of over-crowding, all of which have an impact on health. The policy will result in loss of open space on the urban fringe, some of which is accessed for recreation purposes, which has strong links to health. The loss of this open space may have some localised impacts on the health of adjacent communities, as well as potentially reducing the ability to meet the accessibility standards for certain types of open space (particularly Natural/Semi-Natural) in the	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>west of the city in particular. However, it is recognised that the amount of open space from the urban fringe assessed to have development potential is equivalent to only 7.5% of the total urban fringe, therefore effects are likely to be minimal. Overall the impacts associated with this option are considered to be mixed. Any proposals for strategic developments would incorporate a Health Impact Assessment, and CP18 is recommended to be strengthened (where HIA is not applicable) in order to ensure there are no adverse health impacts on existing adjacent communities from development.</p>			
14) Integrate health and community safety	Indirect impact. New housing development can contribute towards improving community safety through incorporating design features to design out crime. (See CP12).	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>This policy will result in the delivery of housing, which will have positive impacts on reducing housing based deprivation and overall deprivation, with the Housing domain making up approximately 9% of the weighting for the overall deprivation (Index of Multiple Deprivation). This policy will also result in employment opportunities, which may also help reduce income and employment deprivation. Whether the delivery of housing will have positive impacts on existing deprived communities is considered to be unknown and will depend largely on whether new housing and other opportunities benefit existing communities.</p> <p>This policy results in a 7.5% loss of open space situated on the urban fringe. Access to open space has been linked to reducing health inequalities, with access to open space benefiting all communities but benefitting deprived communities the most (Natural England 2012). It is these communities where long term health conditions such as obesity, heart disease and diabetes are more prevalent, particularly in those that have no or limited access to green open space. In some cases, the urban fringe sites identified are adjacent to some of the city's deprived communities and in these cases loss of this open space could result in a widening of health inequalities.</p> <p>Overall the impacts are considered to be mixed and uncertain. The SA recommends that CP18 is strengthened to ensure that development on the urban fringe addresses any adverse impacts on the health of adjacent communities.</p>	-/+?	-/+?	-/+?
16) Engage local communities	Communities will have the opportunity to be engaged with the planning process, through development control procedures. In addition, the Site Allocations stage is likely to involve significant consultation, including consultation on urban fringe sites. Significant community engagement would also be anticipated for development of DA7.	+	+	+
17) Make the best of previously developed land	Previous trends indicate that a high proportion of housing has been built on PDL. It is likely that all housing delivered in the development areas, will be on PDL. In addition, housing development situated on major development sites within development areas (with the exception of DA7) is expected to achieve a minimum density of 100dph.	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	Housing delivered at DA7, and on other urban fringe sites , will be on greenfield land, however this in itself does not mean that the best use of previously developed sites in the city has not been gained, with 85% of housing development being directed to PDL.			
18) Maximise sustainable energy	New development has potential to increase consumption of energy, therefore contributing towards climate change. CP8 requires all new residential development to achieve zero carbon status and sets various other requirements. In addition, the government requires all new homes to be zero carbon by 2016 meaning that the impact is more likely to be positive in the medium to long term.	-	+	+
19) Taking account of the changing climate	New development could be unsustainable and be of limited longevity if it does not incorporate measures or features to enable it to withstand extremes of temperatures and weather conditions associated with climate change, thereby having the potential to have a negative impact on this objective. In addition, it is recognised that some of the development areas are located in coastal locations, with flood risk increasing as a result of climate change in the long term. The loss of Greenfield urban fringe sites could potentially exacerbate problems caused by periods of increased heavy rainfall and increased temperatures associated with climate change through the increase in impermeable surfacing that is unable to absorb water, with this considered to become more significant in the long term. Development in these locations should therefore incorporate significant SUDS. All new development, including residential and mixed use will be required to meet the requirements of CP8, which include contributing to minimising the urban heat island effect through off-site tree-planting, which will help in adaptation to climate change.	-	-	--
20) Meet BREEAM / Code for Sustainable Homes	New development could fail to meet high environmental standards having a negative impact on the residents (e.g. through higher energy/water bills) as well as the wider environment. Greenfield development is no longer required to meet higher environmental standards. CP8 currently requires new developments to meet various standards in the Code for Sustainable Homes, although this is likely to change in future in accordance with national standards.	-	-	-
21) Increasing accessibility	Inappropriately located development could severely impact residents' access to various services, including transport, food and health facilities. However the Development Area policies as well as SA6, CP12, CP13, CP18, and CP9 should ensure that access to services is met. Development at DA7 and on other urban fringe sites , would not increase accessibility to services, and investment in public transport would be necessary, as well as ensuring that there are local amenities and services to meet residents basic needs. In addition, loss of open space within the urban fringe will reduce access to open space and may impact on the open space accessibility standards in some areas. Overall, the impacts are considered to be mixed.	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
22) Reduction of waste	Housing development highly likely to create an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy CP3 – Employment Land

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Indirect impact. The safeguarding of existing employment land for employment uses is considered unlikely to have any impact on biodiversity. Re-development on existing sites is considered unlikely to have any adverse impacts on biodiversity, and may bring about opportunities for development to incorporate biodiversity features, having positive benefits. The policy also supports delivery of a large quantity of employment floorspace over the Development Areas, some of which will replace existing and this is unlikely to have adverse impacts on biodiversity. However, some of this will be on undeveloped/Greenfield sites and this may have adverse impacts on biodiversity depending on the site. The impacts of the Strategic Allocations and proposals within Development Areas will be assessed in more detail in the individual policy assessments. CP8 and CP10 should ensure that any upgrades and refurbishments, as well as re-development on existing sites and new developments include opportunities to enhance biodiversity.</p>	-/+?	-/+?	-/+?
2) Improve air quality	<p>The safeguarding and protection of existing employment land/floorspace is unlikely to have any impact on air quality. Re-development on existing sites is also considered unlikely to have any significant impact on air quality.</p> <p>The delivery of additional employment floorspace throughout the city is likely to have a negative impact on air quality as this may result in more journeys made to access employment or through increased economic activity. With the exception of DA7 Toads Hole Valley, it is recognised that the Development Areas are located with good links to sustainable transport and therefore present the opportunity to travel more sustainably, however they are also located within the AQMA where levels of NO2 already exceed the annual air quality objective at various roadside locations.</p> <p>DA policies and CP9 should contribute towards ensuring that development is situated within areas of good transport links, and ensure that major development schemes respond to the demand for travel that they create.</p>	-	-	-
3) Maintain local distinctiveness	<p>The safeguarding and protection of existing employment land/floorspace is unlikely to have any impact on this objective. Re-development on existing sites is also considered unlikely to have any adverse or significant impacts, however the references for proposal of upgrades to office and industrial accommodation to include improvements to design may bring about positive impacts for this objective.</p> <p>However, new employment-based development has the potential to have a negative impact on the surrounding Conservation Areas and specific sites or buildings if poor quality design is permitted or is located in inappropriate locations that will impact on historic buildings/conservation areas etc. CP12 should ensure effect is positive and that development achieves high standards of urban design.</p> <p>Employment-based development also has the potential to have a negative impact on</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	open space, if open space is developed for employment uses and may also increase pressure on existing open space (e.g. for use by workers). CP16 should ensure open space is protected from employment-based development.			
4) Protect South Downs	Employment based development located within the city-centre Development Areas is unlikely to have any impact on the SDNP. Development at Toads Hole Valley may impact on the landscape setting of the SDNP due to its proximity, as may re-development at some of the named industrial sites, e.g Woodingdean Business Park and Hollingbury Industrial Estate, due to their proximity to the SDNP, however is generally considered to be uncertain. Mitigation in regards to the impacts of development on the SDNP associated with development within DA7 Toads Hole Valley, will be included within the policy itself.	-?	-?	-?
5) Provide decent, affordable housing	It is recognised that the protection of employment sites for employment-uses could have a negative impact on the provision of housing, due to the availability of sites and land available for development. This issue will be addressed in the forthcoming City Plan Part 2. However, it is noted that the policy allows mixed-use development (of employment and residential) on certain existing employment sites that are considered to be suitable. In addition, the policy specifies the circumstances where other sites could be allocated to alternative uses if it can be demonstrated to be redundant and incapable of meeting modern employment needs, one of which is affordable housing.	+	+	+
6) Reduce amount of car journeys	The policy should lead to an increase in employment-based floorspace, which could have both positive and negative impacts in relation to this objective. In terms of positive impacts, increased employment opportunities based within the city, could reduce the need for out-commuting and reduce the need to travel by car to work. However, journeys to work by car within the city could also increase with an increased economic activity, particularly to locations that are not located within good proximity to sustainable transport modes, such as some of the industrial estates. It is noted however that the majority of the Development Areas are located along sustainable transport corridors. Mitigation in regards to the travel impacts of employment based development at DA7 Toads Hole Valley will be included within the policy itself. CP9 requires major developments to respond to the demand for travel they create, which should help to minimise the negative impact although is unlikely to reduce it completely. In addition, CP9 promotes a citywide modal shift, and proposes that bus based rapid transport scheme serve major employment sites.	-/+	-/+	-/+
7) Minimise risk of pollution to water	Protection of existing industrial estates or mixed use development on existing employment sites are considered unlikely to increase the risk of surface water flood risk and may provide the opportunity to install SUDS. However, any new development on previously undeveloped sites has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution. In addition, some of the Development Areas are also located in	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	areas of high susceptibility to surface water flood risk and will be assessed in more detail in individual policy assessments. CP8 and CP11 should ensure that appropriate systems in place to reduce risk of surface water flooding.			
8) Minimise use of water	The policy states that the council will support proposals which will enable existing office accommodation and industrial estates and premises to be upgraded/refurbished and more detail is provided in the supporting text about the types of proposals that will be supported, which includes measures to improve resource efficiency, and this is likely to bring about positive impacts against this objective. However, the policy is also concerned with delivery of new employment-based development and this is likely to increase will increase demand for water. CP8 should ensure that water consumption is minimised.	-/+	-/+	-/+
9) Promote development of contaminated land	Some of the sites named may have potential for contamination due to their current uses, and redevelopment may provide opportunity for remediation, although this is uncertain.	+?	+?	+?
10) Manage coastal defences	It is recognised that DA2 Brighton Marina and DA8 Shoreham Harbour are located in areas that may be more vulnerable to tidal flooding. CP11 should ensure that development is only located in appropriate locations and that development in areas of high flood risk is planned sequentially to reduce the risk.	-	-	-
11) Employment: balance needs of tourists, residents and businesses	Safeguarding of existing, refurbishment of existing and provision of new employment space is a key aim of this policy and is therefore likely to have a significant positive impact on this objective. However, there is some degree of uncertainty as the amount of employment floorspace to be delivered is lower than the amount as assessed as required. However, overall, the policy is likely to lead to: an increase in employment floorspace, investment in existing sites and premises potentially leading to increased productivity, and creation and safeguarding of jobs in various sectors through provision of appropriate workspace that meet their needs. Although the policy allows mixed use development on some named sites and other un-named sites where redundancy can be proven, the tests for redundancy set out in the Supporting Text are considered to be robust and are not considered to allow redundancy to occur. The policy now makes reference to allocating additional sites in Part 2 of the City Plan. This will be needed to support job and economic growth.	++?	++?	++?
12) Support economic development	This is a key aim of this policy and as objective 11, the policy is likely to have a significant positive impact in supporting the local economy, helping the local economy grow and supporting provision of employment opportunities, however is also considered uncertain due to the amount of employment floorspace identified being less than the assessed amount required. Naming of sites which will be protected and where redevelopment/refurbishment will be encouraged may help to bring development forward. The City Plan Part 2 will need to ensure adequate provision of employment sites, to ensure the economy is not constrained.	++?	++?	++?

SA Objective	Summary of effects	Short term	Medium term	Long term
13) Improve health	The policy will result in the safeguarding and provision of sites for employment. Access to meaningful employment opportunities is a wider determinant of health and therefore the impacts for health are considered to be positive. The potential for waste uses to be located on industrial estates may result in environmental nuisance that could affect health, such as air, noise or odour pollution. See mitigation. On balance, the policy is likely to have a positive impact on this aspect of the objective, provided that the other potentially negative impacts highlighted through the SA are minimised or reduced as far as possible, particularly the issue relating to increased congestion.	+	+	+
14) Integrate health and community safety	Indirect impact. New employment-based development can contribute towards improving community safety through incorporating design features to design out crime. (See CP12). In addition, it is recognised that mixed use developments contribute towards creating safer communities through encouraging natural surveillance and footfall at different times of the day.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The policy should lead to increased opportunities for employment throughout the city, but also in areas where employment-based deprivation is high through the Development Area policies and should therefore have positive impacts on this objective.	+	+	+
16) Engage local communities	There is no direct link with this objective.			
17) Make the best of previously developed land	As the policy is concerned with increasing employment-land provision in the city, any re-development on a site currently used for employment is likely to increase employment provision on that site, therefore make better use of PDL. In addition, re-development on existing sites that may lead to increased economic output, will also make better use of PDL.	+	+	+
18) Maximise sustainable energy	The policy states that the council will support proposals which will enable existing office accommodation and industrial estates and premises to be upgraded/refurbished and more detail is provided in the supporting text about the types of proposals that will be supported, which include energy efficiency, having a positive impact on this objective. However, new development has potential to increase consumption of energy, therefore contributing towards climate change. CP8 requires all new non-residential major development to achieve various BREEAM standards, according to size, and in addition, the government's target for all new non residential development to be zero carbon by 2019 will have a positive impact against this objective in the medium to long term.	-/+	+	+
19) Taking account of the changing climate	New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. CP8 requires all development to be able to respond to changing needs.	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
20) Meet BREEAM / Code for Sustainable Homes	New development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various standards of BREEAM depending on their size or location.	-	-	-
21) Increasing accessibility	The policy is concerned with increasing provision of employment-based land and potentially increasing productivity on existing sites and therefore should help increase access to employment opportunities. It is noted that the majority of Development Areas are situated within good access to sustainable transport.	+	+	+
22) Reduction of waste	<p>The policy now contains a specific reference to allow waste management facilities to be developed on suitable industrial estates and this is considered to bring about positive impacts against this objective.</p> <p>Any new development is highly likely to create an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.</p>	+	+	+

Policy CP8: Sustainable Buildings

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impact. The policy is likely to have a positive impact on biodiversity, as the policy requires developments to demonstrate how they will enhance biodiversity. In addition, the policy includes the requirement for developments to reduce the heat island effect, which can be achieved through planting, and requires developments to encourage food growing, which would also have positive impacts on biodiversity. In addition, meeting various requirements of BREEAM/CSH will also ensure the consideration of biodiversity, with impacts considered to be more significant in the medium to long term.	+	++	++
2) Improve air quality	Direct impact. The policy is likely to have a positive impact on improving air quality, as the policy requires development to demonstrate how they will reduce air pollution. In addition the requirements of BREEAM/CSH will also ensure that air pollutants are minimised (e.g. NOx from heating systems) as well as includes sections of provision for cycle storage, which would have an indirect impact.	+	+	+
3) Maintain local distinctiveness and sites	There is no direct link with this objective.			
4) Protect South Downs	There is no direct link with this objective.			
5) Provide decent, affordable housing	The costs of building highly sustainable homes may conflict with the viability of providing housing, including affordable housing. Meeting high standards could jeopardise delivery of housing, particularly in the current economic climate. The supporting text does state that financial viability of a scheme will be a consideration. It is now recognised that the environmental building standards required to be achieved for residential development have been reduced. This means that the costs to developers will be lower and potentially mean that residential development is more viable. The reduction in the standards required, in addition to the existing policy text that states viability of a scheme will be considered, has resulted in a change from the previous score of adverse impact to negligible impact on this objective.			
6) Reduce amount of car journeys	Indirect impact. The policy is likely to have a positive impact on this objective, as BREEAM/CSH standards includes sections on provision of areas for cycle storage, although is not specific about proximity to public transport or car free housing.	+	+	+
7) Minimise risk of pollution to water	The policy is likely to have a positive impact on minimising the risk of pollution to groundwater, as the policy requires development to demonstrate how they will reduce surface water run-off and should help to meet the requirements of the Water Framework Directive. In addition CSH includes a section dedicated to surface water run-off. The policy now also requires development to safeguard water resources if	++	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	located within a groundwater source protection zone, and this is considered to result in a significantly positive score.			
8) Minimise use of water	<p>The policy is likely to have a significant positive impact on this objective, through the requirement to meet various standards in reduction of water consumption as required by BREEAM or CSH, with standards for residential increasing in accordance with building regulations in 2016 and 2019.</p> <p>It is recognised that the required residential standards have reduced from the previous iteration from Level 5 to Level 4 (2013-2016 for major/greenfield) and from Level 6 to Level 5 for post 2016 and post 2019 for all types of residential development to bring them into alignment with national policy. However, the policy still contains a requirement for development to aspire to water neutrality. In the medium to long term, to meet Level 5 CSH would require water consumption to be 80l/p/day. This is the same as the requirement for CSH Level 6. Therefore, this reduction in the medium and long term requirements is not considered to impact upon these scores, and these are still considered to be significantly positive.</p> <p>In the short term, to meet Level 4 CSH would require water consumption to be 90l/p/day. Although this is less than the Level 5 requirements, this is not considered to significantly change the short term score, which remains at (+).</p>	+	++	++
9) Promote development of contaminated land	Policy criterion K now requires development to reduce land pollution. This could have positive implications towards this objective.	+	+	+
10) Manage coastal defences	There is no direct link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	There is no direct link to this objective.			
12) Support economic development	There is no direct link to this objective.			
13) Improve health	Indirect impact. The policy is likely to have a positive impact on health, through provision of decent housing with low energy costs, therefore minimising the risk of fuel poverty; through enhancements to biodiversity and encouragement of food growing which can improve health and well-being; through improvements to air quality, through encouragement of use of healthy forms of transport; through protection of groundwater resources through reducing surface water run-off; and through minimising the wider health issues associated with climate change through potential reductions in carbon emissions. In addition, Code for Sustainable Homes includes a section dedicated to health and wellbeing, with sections on access to private open space, maximising natural daylight, ensuring adequate sound insulation and meeting requirements of	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	Lifetime Homes.			
14) Integrate health and community safety	There is no direct link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	Indirect impact. The policy is likely to have a positive impact on this objective, through the potential to reduce risk of fuel poverty, due to reduction in living costs associated with more energy efficient housing, as well as through the potential for energy efficiency improvements to existing housing stock. In addition, the requirements for development to connect to or make a contribution towards decentralised energy schemes, such as district heating could also reduce fuel poverty.	+	+	+
16) Engage local communities	There is no direct link to this objective.			
17) Make the best of previously developed land	Direct impact. The policy is likely to have a positive impact on this objective, as the policy requires developments to demonstrate how they will make the most effective use of land.	+	+	+
18) Maximise sustainable energy	<p>Direct impact. This is one of the objectives whereby the policy is likely to have a significant positive impact in the medium to long term, with the reduction in CO2 emissions being one of the key aims of the policy. This will be achieved through the design of buildings, as well as through energy efficiency measures that reduce consumption of energy. The policy also makes a specific requirement for development to incorporate renewable energy technologies and connect to or make contributions towards low/zero carbon schemes.</p> <p>It is recognised that the required residential standards have reduced from the previous iteration from Level 5 to Level 4 (2013-2016 for major/greenfield) and from Level 6 to Level 5 for post 2016 and post 2019 for all types of residential development to bring them into alignment with national policy. However, the policy still has numerous other requirements which should result in reductions in energy consumption.</p> <p>In the medium to long term, to meet Level 5 CSH would require 100% reduction in carbon emissions when compared with building to current building standards requirements. To meet Level 6 CSH would require the development to be zero carbon. Although meeting CSH 6 would result in less CO2 emissions than CSH5, this is not considered to impact significantly on the SA score in the medium to long term, as building to CSH Level 5 will still result in significant savings. The scores in the medium to long term are therefore still considered to be significantly positive.</p> <p>In the short term, to meet CSH Level 4 requires a minimum 25% reduction in CO2 emissions. Although this differs quite substantially from the CSH 5 requirements, this will still lead to a reduction in emissions. Therefore this is not</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	considered to change the short term score from the previous iteration of (+)			
19) Taking account of the changing climate	Direct impact. The policy is likely to have a positive impact on this objective, as the policy requires developments to demonstrate how they will address climate change adaptation and use sustainable materials.	+	+	+
20) Meet BREEAM / Code for Sustainable Homes	Direct impact. Between draft Plan and Submission Plan stages, the standards for residential development were reduced in the short term period. This resulted in a change in score in the short term. The standards required for major and Greenfield residential development have been reduced further to bring them into alignment with national policy, however overall this is not considered to significantly change the SA scores, particularly those post 2016.	+	++	++
21) Increasing accessibility	There is no link with this objective.			
22) Reduction of waste	Direct impact. The policy is likely to have a positive impact on the reduction of waste, as the policy requires developments to demonstrate how they will minimise waste and facilitate recycling, composting and re-use of materials. The supporting text also makes reference to aspiring towards waste neutral developments. In addition, waste is an issue addressed through CSH, which includes construction waste associated with development at construction stage.	+	+	+

Policy CP16: Open Space

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. Policy will have a positive impact on protecting and enhancing biodiversity through retention of existing and creation of new open space and the biodiversity benefits this will bring. Policy also specifies retention of links between spaces, which will have a positive impact on biodiversity and makes specific reference to ensuring new open space provided by developments accords with Biosphere Reserve principles. The policy now states that the Urban Fringe Assessment will be a material consideration in the determination of planning applications prior to the adoption of the City Plan Part 2. The Supporting Text also refers to the Assessment having found potential for housing development on urban fringe sites. Sites within the Urban Fringe include natural/semi-natural open space and other sites with high biodiversity value. Development on these sites could therefore have adverse impacts on biodiversity. Overall, impacts are considered to be mixed.</p>	-/+	-/+	-/+
2) Improve air quality	<p>Direct impact. Policy likely to lead to an improvement in overall air quality, as areas of open space/natural habitats/planting help with absorption of polluting particles. Also, access standards to open space in terms of walking distance identified in Open Space, Sports and Recreation Study, which should help to ensure open space can be accessed easily on foot and the policy makes various references to ensuring there is appropriate access to open space. It is considered unlikely that the loss of open space to residential development within the urban fringe would have any significant impact on air quality.</p>	+	+	+
3) Maintain local distinctiveness and sites	<p>Direct Impact. Overall, the policy should ensure that existing areas of open space will be protected and improved, including audited open space, the Green Network/Nature Improvement Area, beaches, and the countryside. Policy will also protect any new open space allocations made through City Plan Part Two. Policy clearly specifies that new development will be required to contribute to provision of open space, and that developer contributions will be sought for off-site provision if required. Poor quality, under-used areas of open space will be improved. Policy should also lead to contributions from new development for the improvement of public open space to ensure that the needs development generates can be met, in accordance with local open space standards. The policy also specifies that proposals for new open space will need to have agreed maintenance plans, thus reducing the risk that new open space becomes neglected.</p> <p>The urban fringe makes up a significant proportion of the city's open space resource, The policy sets out that the Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	when sites are formally allocated. This is indicative of sites coming forward for housing, some of which would result in a net loss against the city's assessed quantity. Overall, it is acknowledged that the Urban Fringe Assessment identifies approximately 31ha (7.5%) of the urban fringe as having potential for residential development which is equivalent to 2.4% of the city's total assessed quantity of open space. Overall, this loss is likely to have only a negligible effect on the city overall, however may have stronger adverse impacts on adjacent communities, although the supporting text recognises that this may be compensated by the closer proximity to the SDNP for these communities.			
4) Protect South Downs	Indirect impact. The majority of urban fringe sites are adjacent to the SDNP. The policy now indicates that the Urban Fringe Assessment will be a material consideration in the determination of planning applications prior to Part 2. This indicates that residential development is likely in this location. This could have adverse impacts on the landscape setting of the city and SDNP. In addition, increased recreation may occur on the SDNP resulting from the loss, with the policy stating that the loss of some sites could be compensated by the National Park open space offer. Mitigation would be required to ensure landscape impacts are minimised.	-?	-?	-?
5) Provide decent, affordable housing	The policy now indicates that residential development is likely to come forward in the urban fringe on sites that have been identified as suitable for residential development in the Urban Fringe Study 2014. This brings more certainty that some sites will be brought forward for housing, and impacts positively on this objective.	+	+	+
6) Reduce amount of car journeys	Direct impact. The policy promotes improvements to sustainable access to sites and through sites. Well linked areas of open space facilitate pedestrian/cyclist movement across the city, and may help contribute to a reduction in car journeys. The policy refers to open space meeting certain accessibility standards in terms of walking distance, which should help to reduce the need to travel by car to sites of open space. There are likely to be impacts associated with an increase in residential development on the urban fringe, however these are looked at in more detail under CP1. Transport impacts relating to the loss of open space from a recreational aspect are considered to be negligible overall.	+	+	+
7) Minimise risk of pollution to water	Direct impact. Open space provides natural drainage, therefore helping to reduce the risk of surface water flooding and associated pollution to ground water and helps to meet the requirements of the Water Framework Directive. This will become more significant in the long term as climate change likely to lead to increased rainfall and weather extremes. Loss of sites of open space on the urban fringe could increase the risk of surface water flood risk elsewhere and would require mitigation to maintain Greenfield run-off rates. Overall impacts are considered	-/+	-/++	-/++

SA Objective	Summary of effects	Short term	Medium term	Long term
	to be mixed.			
8) Minimise use of water	There is no direct link to this objective.			
9) Promote development of contaminated land	There is no direct link to this objective.			
10) Manage coastal defences	Indirect impact. Policy likely to protect natural coastal defences, through identification and inclusion of maritime cliffs and slopes as part of the open space framework.	+	+	+
11) Employment: balance needs of tourists, residents and businesses	Indirect impact. Policy supports improvements to regional or tourist open space provision, where they also address local needs, thus balancing the needs of visitors and residents.	+	+	+
12) Support economic development	There is no link to this objective.			
13) Improve health	Direct impact. Policy will lead to safeguarding, improvement and expansion of different types of open space, including quiet open space, throughout the city. Access to open space likely to lead to improvements in physical and mental health. Well linked areas of open space also facilitate movement across the city, and again contribute to increased activity and improved health. Supporting text makes the point that the closer the area of open space to communities, the greater the health benefits through the increased likelihood of use and now also requires new development to provide on-site food growing initiatives, which could have further health benefits. The loss of open space within the urban fringe to housing, has positive benefits for the housing determinant of health, although may impact on the health of adjacent communities, through reduced opportunity for informal recreation. This is not considered to outweigh the positive benefits of this policy overall, the main thrust of which is retention of open space, and is discussed in more detail under Objective 15.	++	++	++
14) Integrate health and community safety	Direct impact. Policy should help to improve community safety as specifically requires that new open space provided by developments are safe and offer good passive surveillance. In addition, new sites allocated for open space will also be required to provide measures that improve public safety in and around the spaces. Paragraph in main policy relating to appropriate lighting will also help in improving community safety.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	Direct impact. Policy recognises that there is a need to secure investment in poor quality under-used space in disadvantaged areas. It is recognised that some outer-lying neighbourhoods have higher than average levels of deprivation (Index of Multiple Deprivation) including lower than city average life expectancy. Loss of open space on the urban fringe could limit an individual's ability to access open space for recreation and leisure purposes, with it being recognised that proximity to open space influences physical activity levels, and could increase health inequalities between the most and least deprived communities in the city.	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	Overall, impacts are considered to be mixed and Health Impact Assessment or similar will be required to ensure development on urban fringe open space sites does not increase health inequalities.			
16) Engage local communities	There is no direct link to this objective, although loss of urban fringe sites likely to involve high levels of community engagement.			
17) Make the best of previously developed land	There is no direct link to this objective.			
18) Maximise sustainable energy	There is no direct link to this objective.			
19) Taking account of the changing climate	Direct impact. Natural habitats and open spaces contribute towards reducing the effects of climate change, e.g. through reduction of urban heat island effect or increased temperatures. This will become increasingly important in the long-term as weather conditions become more extreme. Loss of open space on the urban fringe could have an impact on the city's ability to adapt to climate change.	-/+	-/+++	-/+++
20) Meet BREEAM / Code for Sustainable Homes	There is no direct link to this objective.			
21) Increasing accessibility	Direct impact. Policy is likely to lead to improvements to access to open space through the various references to ensuring appropriate sustainable access to and between existing and new areas of open space, although loss of open space in the urban fringe could impact on the accessibility standards.	-/+	-/+++	-/+++
22) Reduction of waste	There is no direct link to this objective.			

Nb: The SA recognises that residential development will only be permitted on those sites identified in the Urban Fringe Assessment (2014) and that any application for residential development will still be subject to the planning application process. In addition, the site allocations process at Part 2 may eliminate some sites. The sites which have been identified as having potential for residential development are those where it is considered that adverse impacts can be minimised to an acceptable level. In addition, the policy itself requires adverse impacts must be mitigated. This means that the adverse impacts identified in the SA are likely to be minimised or mitigated and may result in negligible impacts overall.

However the above assessment is based on worst-case scenario and represents the situation if mitigation did not occur.

Policy CP17: Sports and Recreation

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. As the policy could lead to the development of new sports facilities/spaces, there is the potential to have a negative impact on this objective, as any new development could potentially harm existing biodiversity on a site, however this is considered to be minimal. New development also provides potential to enhance biodiversity through incorporation of biodiversity features. CP1 and CP5 should ensure effect is positive and enhances biodiversity.			
2) Improve air quality	Direct impact. The policy makes specific references to the fact that any new development must be accessible, with specific standards to be met (e.g. outdoor sports within 20 minute walking distance. This standard for accessibility should help to ensure that any negative impact on air quality is avoided through minimising the need to travel by car.	+	+	+
3) Maintain local distinctiveness and sites	Direct impact. Overall, the policy seeks to retain and enhance existing provision, which will help to ensure that access to sports based open space is maintained. However, the revised policy now sets criteria where loss of buildings and open space will be acceptable, to comply with the NPPF and Open Space Study Update 2011. The policy now refers to the Urban Fringe Assessment being a material consideration to any planning applications prior to Part 2. It is understood that only 1 site that is designated as outdoor sports has been identified as having any residential development potential. This site is currently an un-used playing fields. Although this goes against the recommendations of the Open Space Study, and will be a loss against the future requirements, overall the effects of this are considered to be negligible citywide, and the policy is still considered to be positive towards this objective. In addition, as the policy requirements require mitigation to be secured as part of a scheme, this could result in improvements to other outdoor sports facilities.	+	+	+
4) Protect South Downs	Indirect impact. The policy now refers to the Urban fringe Assessment. The location of the one site of outdoor sports, which is surrounded by existing built up area is not considered to create adverse impacts. Overall, the policy should not have any impacts on this objective.			
5) Provide decent, affordable housing	Although only 1 site has been identified in the Urban Fringe Assessment, development on this site will have positive implications for this objective.	+	+	+
6) Reduce amount of car journeys	Direct impact. As with objective 2, the policy makes specific references to the fact that any new development must be accessible, with specific standards to be met (e.g. outdoor sports within 20 minute walking distance. This standard for accessibility should help to ensure that the number of journeys made by car to sports facilities are reduced.	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
7) Minimise risk of pollution to water	Indirect impact. As the policy recommends the development of new sports facilities/spaces, there is the potential to have a negative impact on this objective, as any new development could cause an increase in impermeable surfaces and therefore increase the risk of surface water flooding and pollution of groundwater. In addition, loss of outdoor sports provision to housing, particularly playing fields which mimics the natural environment, could also increase surface water flood risk. However, new development provides the opportunity to incorporate appropriate SUDS and should be addressed through CP1 and CP10.	-	-	-
8) Minimise use of water	No direct impact.			
9) Promote development of contaminated land	There is no link to this objective.			
10) Manage coastal defences	There is no link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	Indirect impact. The retention and enhancement of existing provision will safeguard jobs, and any new development will increase employment opportunities at construction and operation stage. Policy ensures that provision will continue to meet residents' needs, as well as the needs of visitors.	+	+	+
12) Support economic development	There is no direct link to this objective, however is it recognised that the revised policy, which sets criteria for when loss is accepted could result in sites becoming available for other forms of development, which may have positive impact on this objective, however remains uncertain.			
13) Improve health	Direct impact. The policy will have a significant impact on this objective through the obvious physical and mental health benefits participation in sport or physical activity brings. In addition, the policy states that any new development (e.g. housing) must make provision for the demand it generates. The policy also seeks to increase participation in sport, particularly from those currently under-represented. The loss of the 1 site of outdoor sports provision within the urban fringe is considered to have a negligible negative impact when based against the remaining policy objectives , and the overall impact of the policy is considered to be positive.	+	++	++
14) Integrate health and community safety	The supporting text states that a link has been shown between participation in sport and reduction in crime, therefore is likely to have a indirect positive impact on this objective.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	Indirect impact. The policy makes specific reference to securing investment in provision in residential renewal areas, therefore contributing to reducing health inequalities. The loss of the 1 site of outdoor sports provision within the urban fringe is considered to have a negligible negative impact on this objective when based against the remaining policy objectives.	+	++	++
16) Engage local	Direct impact. The policy seeks to increase participation in sport, therefore having a	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
communities	positive impact on this objective.			
17) Make the best of previously developed land	Direct impact. The policy supports the redevelopment/enhancement of existing provision, and will therefore help to make the most of previously developed land.	+	+	+
18) Maximise sustainable energy	No direct impact.			
19) Taking account of the changing climate	Indirect impact. Loss of outdoor sports provision that performs a function associated with natural open space could also increase the city's vulnerability to climate change, although the impacts of loss of one site are considered to be negligible. CP1 requires all development to be able to respond to changing needs.			
20) Meet BREEAM / Code for Sustainable Homes	No direct impact			
21) Increasing accessibility	Direct impact. Overall, the policy seeks to increase accessibility to sports provision, through requirements that new development meets standards for accessibility. Loss of one un-used site on the urban fringe is considered to have a negligible effect on access to outdoor sports.	+	+	+
22) Reduction of waste	Indirect impact. New development of any kind highly likely to create an increase in waste, both during construction and operation stage. CP1 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Nb: The SA recognises that residential development will only be permitted on sites identified in the Urban Fringe Assessment (2014) and that only one outdoor sports site has been identified, which is currently un-used. This site has been identified as having potential for residential development and is a site where adverse impacts can be minimised to an acceptable level. In addition, the policy itself requires adverse impacts must be mitigated. This means that the adverse impacts identified in the SA are likely to be minimised or mitigated and may result in negligible impacts overall.

Appendix F The Selection and Rejection of Alternatives

This Appendix has been produced to meet Regulation 12 (2b): *The report shall identify, describe and evaluate the likely significant effects on the environment of: reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.*

This Appendix also contributes towards meeting Schedule 2 para 8: “*An outline of the reasons for selecting the alternatives dealt with*”; and Regulation 12 (2a): *The report shall identify, describe and evaluate the likely significant effects on the environment of: implementing the plan.* However, this information has mainly been provided in the actual assessments of the final policies.

This Appendix includes an individual table for each policy, and provides links back to each stage of plan preparation when the policy, or alternatives to it, were assessed. It should be noted that not all policies were considered at each stage of plan preparation. Each table is presented in chronological order.

It should be noted that in the majority of cases, options that were assessed at Preferred Options 2006 stage were superseded by options that were considered at Revised Preferred Options 2008 stage, including the do nothing option. Only the preferred options of relevance to current City Plan policies have been included for information purposes only.

Key to stages of preparation:

IO 2005	Issues and Option 2005
PO 2006	Preferred Options 2006
RPO 2008	Revised Preferred Options 2008
PAP 2009	Proposed Amendments Papers 2009
SUB 2010	Submission Core Strategy 2010
POP 2011	Policy Options Papers 2011
DCP 2012	Draft City Plan Part 1 2012
SUB 2013	Submission City Plan Part 1 2013
PM 2014	Proposed Modifications to the City Plan Part 1 2014 (This covers modifications put forward during July, and further revisions to the Proposed Modifications put forward in October).

Spatial Strategy		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Option A – An accessibility-led approach. Optimising development within the built up area by identifying areas based on their accessibility to sustainable travel.	I&O 2005	Selected. The SA found this option to have the greatest potential for reducing car use and improving air quality, and making employment opportunities more accessible, but that it could have other adverse impacts if applied in isolation, including loss of local distinctiveness, not making the best use of previously developed land and not taking into account whether development can be accommodated. Deprivation in less accessible locations may also increase.
Option B – A regeneration-led approach. Optimising development opportunities within the built up area by identifying areas of growth opportunity based on regeneration needs, including directing development to EB4U and Neighbourhood Renewal Areas.	I&O 2005	Rejected. This approach had some positive impacts including improving the health and employment opportunities for deprived communities. However, this approach could have adverse impacts on air quality and congestion, particularly in less accessible locations if sustainable transport was not improved, and that other areas of the city could suffer from economic deprivation. The SA concluded that the identified regeneration areas should be included within any preferred option, but that significant higher density development should not be permitted until social and employment issues had been addressed.
Option C – An urban character / urban capacity-led approach. Based on the findings of studies which indicate the type and density of housing that could be accommodated within the urban areas of the city.	I&O 2005	Selected. This option was found to have positive impacts for biodiversity, preserving local distinctiveness, achieve better accessibility, enable economic development, improve community safety and make the best use of PDL. Some adverse impacts were identified including increasing pressure on existing infrastructure, and may not address specific health issues. The SA suggested that this approach should form part of the preferred option.
Option D – Limited development and expansion on the urban fringe. Still optimising development within the built up area but in addition to allow limited development on the urban fringe in the long term.	I&O 2005	Rejected. There were some positive impacts resulting from this option including the potential gains for enhancing visitor experiences to the SDNP, and the reduction in pressure within the built up area, particularly benefiting the historic built environment. More adverse impacts were identified including the likelihood for biodiversity losses and losses of leisure and open space. This option was also found to potentially increase in traffic congestion due to lack of accessible and sustainable transport and may not protect environmental resources.

		The SA concluded that it may be necessary to allow limited development on the urban fringe to relieve the carrying capacity of the city.
Option E – Identification of large strategic development sites. In addition to optimising development within the built up area, to allow for significant extensions to the Marina, the Harbour, or even a man-made island off-shore.	I&O 2005	Not assessed. This approach was not assessed by the SA as there were serious doubts over the deliverability of such an approach, and that this approach had limited potential.
Business as usual – continue with Local Plan.	I&O 2005	Rejected. Although there were many positives with continuing with the Local Plan approach, this approach was not found able to achieve the aims of spatial planning; it would not assist in the regeneration of deprived areas, it would not deliver the infrastructure required to accompany growth and may not supply the housing needed to meet needs and is reliant on windfall. The SA concluded that this approach was not a sustainable one in the long term.
Preferred Approach combining Option A and Option C: accessibility/urban character/urban capacity approach and identifying 10 broad areas within the built-up area where significant mixed-use, high density development should be directed to.	PO 2006	The SA noted that the Spatial Strategy had taken on board recommendations to combine certain approaches and to consider strengthening regeneration areas by allowing some development to create more sustainable communities. The 10 broad areas were identified using these combined approaches and should therefore lead to overall positive impacts for maintaining local distinctiveness, supporting employment and economic development, improving health and reducing deprivation, whilst protecting the surrounding countryside.
Preferred Approach, based on PO 2008 Spatial Strategy, identifying 7 broad areas where significant mixed-use high density development should be directed within the built-up area. Some areas were removed from the Spatial Strategy due to limited potential for	RPO 2008	The SA re-considered Option E (Approaches to Growth) at this stage, due to emerging work put forward by SEEDA regarding the potential for Shoreham Harbour to accommodate significant development, and therefore resulted in Shoreham Harbour being included within the Spatial Strategy. The SA also re-considered Option D (Approaches to Growth), however the uncertainty over the extent of the urban fringe due to the SDNP inquiry at the time, along with the findings of the SHLAA and regeneration potential at Shoreham Harbour clarified the decision to continue to exclude the urban fringe from the spatial strategy. The impacts of the Spatial Strategy overall were considered to be similar to those

<p>accommodate change; other areas were combined together to make a larger development; 2 new areas added.</p>		<p>outlined in PO 2006 above, with more specific area-impacts identified in each of the Development Area assessments.</p>
<p>Preferred Approach, mainly based on the RPO 2008 approach, by identifying 7 broad areas where significant mixed-use high density development should be directed. In addition, the Spatial Strategy allows for residential development within the urban fringe to be considered on a contingency basis.</p>	<p>PAP 2009</p>	<p>This change to the Spatial Strategy now includes Option D (from Options for Growth stage) of allowing limited development on the urban fringe in the long term in combination with the other Approaches to Growth that helped to identify the 7 Development Areas (Urban Capacity/Accessibility). The impacts of the change in the Spatial Strategy were considered under the assessment of SA4 (Urban Fringe policy) and were considered to be generally mixed and uncertain in the long term due to the contingency position,, particularly on the environmental objectives, but more positive towards housing. Overall, the Spatial Strategy should still result in impacts as described above, in terms of maintaining local distinctiveness, promoting employment and economic development, improving health and reducing deprivation.</p>
<p>Preferred Policy Approach, as set out under PAP 2009.</p>	<p>SUB 2010</p>	<p>Impacts as PAP 2009 above.</p>
<p>Preferred Approach. Spatial Strategy now consists of 8 Development Areas. 7 are carried forward from SUB 2010 stage and are located within the original built up area (based on the Urban Capacity/Accessibility Approaches). 1 new Development Area added consisting of a former urban fringe site which has been brought into the built up area. The contingency position for development within the urban fringe to take place in the long term has been removed. Spatial Strategy now also</p>	<p>DCP 2012 / SUB 2013</p>	<p>Overall, impacts from the Spatial Strategy should be positive for maintaining local distinctiveness, housing, employment and economic development, health, safety, deprivation and accessibility. Despite being based on the accessibility approach, in combination the Development Areas may have an adverse impact on air quality and transport, and will much depend on travel choices of the increased population. The removal of the contingency position removes some uncertainty associated with the position, and although the Spatial Strategy now includes a Development Area that was formerly located within the urban fringe, some of the impacts of development in this location are more certain due to it being an identified site. Other site specific adverse environmental impacts considered likely.</p> <p>Individual impacts from delivery of Development Area policies are considered in more detail in individual assessments.</p>

<p>includes policy SS1 Presumption in Favour of Sustainable Development.</p>		
<p>Preferred Approach, based on former Spatial Strategy approach of combining the accessibility and urban capacity approaches, maximising opportunities for brownfield development, but now includes the urban fringe as a broad source of potential for housing.</p>	<p>PM 2014</p>	<p>The Spatial Strategy has positive impacts for employment and economic development through the creation of temporary jobs associated with house-building as well service-sector and other jobs to meet the needs of the increased population. Housing will be created to contribute towards the objectively assessed need, also being one of the wider determinants of health. The housing target is lower than the OAN and therefore some local social impacts may not be addressed, although will go further than former versions of the spatial strategy. There will be various environmental impacts, resulting from loss of open space in the urban fringe as well as development on PDL. Loss of some of the urban fringe open space sites will be a net loss against the city's assessed quantity standards, thus increasing the pressure on remaining areas of open and will impact adversely against the standards for accessibility. Loss of open space on the urban fringe could also have adverse health impacts.</p> <p>Development throughout the city will increase the consumption of natural resources. and increase the likelihood of adverse transport-related impacts.</p>

DA1 Brighton Centre & Churchill Square		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
CT3) To Plan for a replacement Brighton Centre.	PO 2006	Selected. A replacement conference centre was found to be positive with regards to culture and tourism in the city.
Option 1) To secure a redeveloped state of the art conference centre in a landmark new building to benefit the city and region and to sustain the tourism economy for the next 30 years.	RPO 2008	Selected. Option had the most potential for positive impacts for employment and the local economy, as well as wider benefits, such as townscape and access.
Option 2) Refurbishment of the Brighton Centre. Limited change in Churchill Square.	RPO 2008	Rejected. Option would not allow wider retail development to come forward, and would not provide opportunities for townscape or streetscape improvements.
Option 3) Business as usual – relying on a more narrowly defined area in the adopted Brighton Centre SPD.	RPO 2008	Rejected. As above, option would not allow wider retail development to come forward, and would not provide opportunities for townscape or streetscape improvements.
Preferred Policy Approach – building on RPO Option 1 above including the Brighton Centre Strategic Allocation to include 25,000sqm conference centre, min 20,000sqm retail, new hotel and other leisure facilities. Various other policy priorities.	SUB 2010	Policy has strong positive impacts for employment and the local economy, should result in improvements to townscape, improve accessibility and community safety. Adverse impacts associated with increased traffic considered likely.
Preferred Policy Approach as at Sub 2010 stage with various minor amendments.	DCP 2012	As Sub 2010 above. Policy has strong positive impacts for employment and the local economy, should result in improvements to townscape, improve accessibility and community safety. Adverse impacts associated with increased traffic considered likely.
Preferred Policy Approach as at DCP 2012 stage, with various	SUB 2013	As DCP 2012 above, but with additional positive impacts on sustainable energy generation.

minor amendments including requirement to consider incorporating heat network systems.		
Preferred policy Approach, as at SUB 2013 stage, with various amendments including stronger requirements around improving/mitigating air quality and additional improvements to the road network.	PM2014	As Sub 2013 above. Adverse impacts associated with increased traffic still considered likely.

DA2 Brighton Marina, Gas Works and Black Rock		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Option 1) To facilitate creation of Brighton Marina as a sustainable mixed used district, creating unique high quality marina environment that will attract residents and visitors and is well connected to the leisure and recreation facility at Black Rock.	RPO 2008	Selected. Option had the most potential for improving public realm and transport, providing housing and employment opportunities and contributing towards economic development.
Option 2) Business as usual	RPO 2008	Rejected. Option would lead to uncoordinated and piecemeal development and would not address place-shaping priorities identified as needing to be addressed in order to ensure a more sustainable mixed use environment.
Preferred Policy Approach – building on RPO 2008 Option (1) above, however specifically prohibits any building going above the cliff height.	PAP 2009	Policy has strong positive impacts for social and economic objectives, particularly housing despite the policy delivering less housing than previous iterations, as well as improvements to public realm. Policy should ensure protection of local ecological environment and adjacent heritage assets through various criteria. Adverse impacts associated with increased traffic considered likely.
Preferred Policy Approach – building on PAP 2009 approach	Sub 2010	Mainly as PAP 2009 above. Increase in housing numbers strengthens positive impact against the housing objective. Risk of adverse impact to ecological environment noted

including Brighton Marina Inner Harbour Strategic Allocation, with an increase in housing numbers to be delivered.		despite policy criteria, however strong protection of adjacent heritage assets. Adverse impacts associated with increased traffic considered likely including impacts on health.
Sustainable Economic Development Option 4(i): No specific allocation of primary employment sites within Development Area policies.	POP 2011	Rejected. The impacts for this option were considered uncertain against environmental objectives due to the lack of information about sites, and considered to be negative against the economic objectives as would not help to promote sites or bring forward development.
Sustainable Economic Development Option 4(ii): Specific allocation of primary employment sites and their roles within Development Area policies.	POP 2011	Selected. This option considered to have more certainty for developers and the business community and had strong positive impacts for the economic objectives. Identification of sites also brings about certainty of impacts against environmental objectives.
Preferred Policy Approach – building on Sub2010 approach and incorporating POP 2011 Option 4(ii) above; policy includes Inner Harbour, Black Rock and Gas Works as three separate strategic allocations.	DCP 2012	Mainly as SUB2010 above with strong positive impacts for housing and economic objectives, and improvements to public realm and access. Risk of adverse impacts to ecological environment and risk that open space provision will not take place. Adverse impacts on objectives relating to water pollution and coastal flooding due to findings of updated SFRA. Adverse impacts associated with increased traffic still considered likely.
Preferred Policy Approach, as at DCP 2012 stage, with some minor amendments including requirement to provide opportunities for sustainable heat and power.	SUB 2013	Impacts as DCP 2012 above, but with more positive impacts for sustainable energy due to new policy requirements.
Preferred Policy Approach – building Sub 2013, with some minor editorial amendments; a less strong requirement relating to sustainable energy production, with viability now	PM 2014	Impacts mainly as DCP 2012/SUB 2013 above. In addition, impacts towards sustainable energy production now considered to be more uncertain as viability may now be taken into consideration; impacts on the SDNP and maintaining local distinctiveness also now considered to be uncertain due to the potential for development to go above cliff height.

grounds for consideration; slight reduction in housing; more flexibility around business uses permitted; removal of cliff height restriction; and removal of district centre status.		
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DA3 Lewes Road		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
L3) Promote expansion of higher education through expansion of the academic corridor whilst protecting the AONB.	PO 2006	Selected. The protection of the AONB was found to be positive against environmental objectives, whilst also being positive for the adjacent deprived areas but raised concerns over traffic related issues.
Alternative to L3) To allow unlimited expansion of the universities.	PO 2006	Rejected. This was found to have adverse impacts on a range of environmental objectives.
Alternative to L3) To not allow any expansion.	PO 2006	Rejected. This was found to have adverse impacts relating to skills, economic development and making the best use of PDL.
Option 1) To enhance the role of the area as part of the city's academic corridor through supporting proposals which enhance secondary, further and higher education provision in Lewes Road and facilitate improved sustainable transport links, improved air quality and enhanced townscape and public realm.	RPO 2008	Selected. Option had the most potential for providing a coordinated approach to development throughout the area, including housing and employment, as well as bringing about improvements to public realm and sustainable transport. The option also considers surrounding communities, including those facing multiple deprivation, having wider community benefits.
Option 2) Business as usual.	RPO 2008	Rejected. This option would result in piecemeal development and would not deliver improvements in sustainable transport or public realm, and would recognise the

		requirements of the academic corridor.
Option 3) Free market approach	RPO 2008	Rejected. This option was found to result in piecemeal development, would not bring about improvement to public realm or sustainable transport, does not recognise the requirements of the academic corridor and may result in more housing and less employment floorspace.
Preferred Policy Approach – building on RPO 2008 Option (1) above and including the Preston Barracks Strategic Allocation.	SUB 2010	Policy has strong positive impacts for housing, the economy and accessibility, particularly through improvements to public realm and sustainable transport. Adverse impacts associated with increased traffic, including impacts on health and deprivation in the long term.
Sustainable Economic Development Option 4(i): No specific allocation of primary employment sites within Development Area policies.	POP 2011	Rejected. The impacts for this option were considered uncertain against environmental objectives due to the lack of information about sites, and considered to be negative against the economic objectives as would not help to promote sites or bring forward development.
Sustainable Economic Development Option 4(ii): Specific allocation of primary employment sites and their roles within Development Area policies.	POP 2011	Selected. This option considered to have more certainty for developers and the business community and had strong positive impacts for the economic objectives. Identification of sites also brings about certainty of impacts against environmental objectives.
Preferred Policy Approach – building on SUB 2010 above, and incorporating POP 2011 Option 4(ii) above; by including Preston Barracks, Woollards Field and Falmer Released Land as three separate strategic allocations. Additional requirements around energy infrastructure and zero carbon added.	DCP 2012	Policy has strong positive impacts for housing, including student housing, the economy and employment, accessibility and promotes sustainable energy provision. Allocation of Greenfield sites results in mixed impacts relating to water pollution and adapting to climate change. Adverse impacts associated with increased traffic considered likely, including impacts on health in the long term.
Preferred Policy Approach, building on DCP 2012 stage	SUB 2013	Policy impacts as described at DCP 2012 above, but with positive impacts on the objectives relating to the SDNP and pollution of water resources.

above and incorporating various minor amendments, including requirements to avoid impacts on the SDNP and to protect groundwater resources.		
Preferred Policy Approach, building on SUB 2013 above and incorporating some minor amendments; more flexibility around business uses permitted; slight increase in housing; stronger requirements relating to protection of groundwater; stronger requirements around improving/mitigating air quality; removal of requirement to achieve zero carbon status for Preston Barracks and Falmer Released Land; and removed specific requirements relating to achieving BREEAM outstanding.	PM 2014	Policy impacts mainly as described at DCP2012/SUB2013 above, but with mixed impacts on the objective relating to achieving high BREEAM standards. Adverse impacts associated with increased traffic still considered likely.

DA4 New England Quarter & London Road		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Option 1) To revitalise the London Road retail area and create a major new business quarter for Brighton & Hove consisting of high quality business accommodation and connecting London Road with	RPO 2008	Selected. This option was found to have the most potential for delivering employment and economic development opportunities that met the needs and priorities of the city, whilst also having potential to protect the environment and improve local biodiversity and green spaces, as well as other linkages between areas.

NEQ and to maintain a green gateway to the city at Preston Road West, characterised by a high quality mixed use environment with local amenities.		
Option 2) Business as usual	RPO 2008	Rejected. This option was found to unlikely to link green spaces together, result in lower quality design, would not preserve local heritage assets, would not provide employment creation that meets the city's priorities, and would be unlikely to improve community safety.
Option 3) To deal with the London Road/Preston Road corridor and Brighton Station/New England Quarter areas separately.	RPO 2008	Rejected. This option was found unlikely to provide links between green spaces, less likely to improve connectivity between the areas, and would not address employment priorities.
Preferred Policy Approach – building on RPO Option 1, but also allowing for mixed use on certain sites, increasing the amount of housing to be delivered throughout the area.	PAP 2009	Policy has strong positive impacts for housing and employment/economic development objectives. Policy also likely to bring about improvements to public realm, community safety, may reduce deprivation and improve accessibility. Potential for adverse impacts against a range of environmental objectives with more significant adverse impacts resulting from anticipated increase in traffic.
Preferred Policy Approach – building on PAP 2009 above, and including the Preston Road site as a strategic allocation.	SUB 2010	Impacts mainly as those described under PAP2009 above.
Sustainable Economic Development Option 2 (i): Accommodate a proportion of the 20,000sqm employment floorspace over several named sites.	POP 2011	Selected. This option considered more viable and deliverable in current economic climate, and creates more certainty for developers and business community having strongest positive impacts against economic objectives.
Sustainable Economic Development Option 2 (ii): Identify DA4 as the broad	POP 2011	Rejected. This option performed less strongly against economic objectives due to less certainty over where development will be permitted.

location suitable of accommodating 20,000sqm floorspace.		
Sustainable Economic Development Option 2 (iii): Identify two sites as strategic allocations to accommodate 20,000sqm floorspace.	POP 2011	Rejected. This option performed least strongly against economic objectives due to lack of sites available in the development area that could accommodate this amount of floorspace.
Sustainable Economic Development Option 4(i): No specific allocation of primary employment sites within Development Area policies.	POP 2011	Rejected. The impacts for this option were considered uncertain against environmental objectives due to the lack of information about sites, and considered to be negative against the economic objectives as would not help to promote sites or bring forward development.
Sustainable Economic Development Option 4(ii): Specific allocation of primary employment sites and their roles within Development Area policies.	POP 2011	Selected. This option considered to have more certainty for developers and the business community and had strong positive impacts for the economic objectives. Identification of sites also brings about certainty of impacts against environmental objectives.
Preferred Policy Approach – building on SUB 2010 above, and incorporating POP 2011 Options 2 (i) and 4(ii) above; by including a range of named sites to deliver 20,000sqm floorspace, New England House, and Preston Road as three separate strategic allocations. Additional requirements around energy infrastructure.	DCP 2012	Policy has strong positive impacts for housing, including provision of student housing, and economic objectives, as well as increasing accessibility and resulting in sustainable energy provision. Other positive impacts include improving biodiversity, community safety, and reduce inequalities. Adverse impacts associated with increased traffic considered likely as well as against a range of other environmental objectives. In addition, development will increase pressure on existing open spaces.
Preferred Policy Approach, building on DCP 2012 stage with various minor	SUB 2013	Impacts as described under DCP 2012 above but with stringer positive impacts relating to sustainable energy production, becoming stronger in the long term.

amendments, and new requirement to provide decentralised energy infrastructure.		
Preferred Policy Approach, building on SUB 2013 stage, with slight reduction in housing and stronger requirements relating to improving/mitigating air quality impacts.	PM 2014	Impacts as described under DCP 2012 and SUB 2013 above. Adverse impacts associated with increased traffic still considered likely.

DA5 Edward Road and Eastern Street		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
1) To secure significant improvements to the public realm and townscape making the area more attractive, accessible and safer for residents, employees and visitors and contribute towards increased business investment in the area.	RPO 2008	Selected. This option was found to have strong positive impacts for the economic objectives as well as having positive impacts for accessibility, community safety and improving local distinctiveness.
2) To look at a larger geographic area encompassing St James Street and Brighton University site.	RPO 2008	Rejected. This option was found to remove the focus from the Edward Road/Eastern Street area and would remove the need for a comprehensive scheme to improve public realm, nor would it address townscape issues.
3) Business as usual	RPO 2008	Rejected. This approach found that insufficient development and sites would be generated from this approach to warrant inclusion in a strategic plan.
Preferred Policy Approach – building on RPO 2008 Option 1 and including two Strategic Allocations of Royal Sussex County Hospital and Edward	Sub 2010	Policy has strong positive impacts for housing, employment and economic development, and accessibility. Policy should also improve local distinctiveness through improvements to public realm and townscape and may lead to reduction in local inequalities. Adverse impacts associated with increased traffic considered likely, as well as against a range of other environmental objectives.

Street Quarter.		
Sustainable Economic Development Option 4(i): No specific allocation of primary employment sites within Development Area policies.	POP 2011	Rejected. The impacts for this option were considered uncertain against environmental objectives due to the lack of information about sites, and considered to be negative against the economic objectives as would not help to promote sites or bring forward development.
Sustainable Economic Development Option 4(ii): Specific allocation of primary employment sites and their roles within Development Area policies.	POP 2011	Selected. This option considered to have more certainty for developers and the business community and had strong positive impacts for the economic objectives. Identification of sites also brings about certainty of impacts against environmental objectives.
Preferred Policy Approach, building on SUB 2010 and incorporating POP option 4 (ii) by including four separate strategic allocations: Royal Sussex County Hospital, Edward Street Quarter, Circus Street Quarter, Freshfield Road and Gala Bingo Hall. Additional requirements around energy infrastructure.	DCP 2012	Policy has strong positive impacts for housing, employment and economic development. Strong positive impacts relating to accessibility. Other positive impacts include increasing community safety and reducing deprivation, and improving biodiversity. Adverse impacts associated with increased traffic considered likely, as well as against some other environmental objectives.
Preferred Policy Approach, building on DCP 2012 above including various minor amendments, including reduction in employment floorspace and requirement for development to incorporate heat exchange networks.	SUB 2013	Policy impacts as DCP 2012 above, but with with more positive impacts against the sustainable energy objective, becoming more significant in the long term.
Preferred Policy Approach, building on SUB 2013 above, with various amendments	PM 2014	Policy impacts as DCP 2013/SUB 2013 above, with a stronger positive impact for housing in the short term.

including stronger requirements to connect to water/sewage network; support for improvement to higher education teaching space; slight increase in housing; and amendments to Freshfield Road Strategic Allocation to indicate the employment and residential elements will be delivered separately, with residential delivered in short term and employment delivered later.		
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DA6 Hove Station Area		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
1) To develop the Hove Station area as an attractive and sustainable employment-led mixed use area creating a high quality employment environment that will attract investment and new employment opportunities for city, whilst promoting efficient use of land through mixed-use development.	RPO 2008	Selected. This option was found to result in the most positive outcomes including transport improvements, improved townscape, increased housing and employment opportunities, and improved economic development.
2) Consider accommodating 20,000 sqm of new office floorspace in the area.	RPO 2008	Rejected. This option was found to not address some of the wider concerns of the area and would not improve the local environment.
Business as usual	RPO 2008	Rejected. This option was more likely to result in piecemeal development and would not result in some of the issues being tackled such as transport improvements, townscape improvements and would be a more reactive approach.

Preferred Policy Approach, building on RPO 2008 Option 1 above.	Sub 2010	Selected. Policy has strong positive impacts for housing, employment and economic development. Other strong positive impacts include making best use of PDL and increasing accessibility. Other positive impacts anticipated relating to reduce water pollution and adapting to climate change, as well as through provision of sustainable energy infrastructure. Some adverse impacts anticipated, including those associated with increased traffic and pollution to water, due to risk of surface water flooding in the area.
Sustainable Economic Development Option 4(i): No specific allocation of primary employment sites within Development Area policies.	POP 2011	Rejected. The impacts for this option were considered uncertain against environmental objectives due to the lack of information about sites, and considered to be negative against the economic objectives as would not help to promote sites or bring forward development.
Sustainable Economic Development Option 4(ii): Specific allocation of primary employment sites and their roles within Development Area policies.	POP 2011	Selected. This option considered to have more certainty for developers and the business community and had strong positive impacts for the economic objectives. Identification of sites also brings about certainty of impacts against environmental objectives.
Preferred Policy Approach building on Sub 2010 and incorporating POP Option 4(ii) above by including Conway Street Industrial Area Strategic Allocation. Additional requirements around energy infrastructure.	DCP 2012 /	Policy has strong positive impacts for housing, employment and economic development. Other strong positive impacts include making best use of PDL and increasing accessibility. Other positive impacts anticipated relating to reduce water pollution and adapting to climate change, as well as through provision of sustainable energy infrastructure. Some adverse impacts anticipated, including those associated with increased traffic and pollution to water, due to risk of surface water flooding in the area.
Preferred Policy Approach, building on DCP 2012 stage above and incorporating minor amendments, including reduction employment floorspace, requirement to protect groundwater and address surface water flood risk	Sub 2013	Policy impacts considered to be as those described under DCP 2012 above, but with more uncertainty for employment and economic development objectives, and more positive implications for pollution to water resources and adaptation to climate change.

and new reference to sustainable energy infrastructure.		
Preferred Policy Approach, building on SUB 2013 above, with reduction in housing to be delivered and additional wording relating to improving/mitigating air quality.	PM 2014	Policy impacts as described under DCP 2012/SUB 2013 above. Adverse impacts associated with traffic still considered likely.

DA7 Toads Hole Valley		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
UF Alternative Option 2) To have a policy that would positively support development on some sites.	PO 2006	Rejected. This option raised potential for adverse impacts against environmental objectives although was found to have potential for positive impacts against the housing objectives and that it may reduce the pressure within the built up area.
Policy SA4, option 3: for the policy to support development of some urban fringe sites for housing and employment in the period 2016-2026 as part of the long term strategy for accommodating growth.	RPO 2008	Rejected. This option raised the likelihood for adverse impacts against environmental objectives. The option also generated uncertainty as at the time the exact boundary of the South Downs National Park and therefore the full extent of the urban fringe was unknown. The option put forward as SA4 protected the urban fringe from development.
Policy SA4 – Preferred Policy Approach to allow for housing development on the urban fringe post 2020 as a contingency.	PAP 2009	Policy considered to have mainly mixed uncertain impacts in the long term, due to the contingency nature of the policy requirement and the unknown location of sites. Positive impacts for housing and employment objectives.
SA4 Preferred Policy Approach – building on PAP 2009 which allowed the contingency position.	SUB 2010	Policy considered to have adverse uncertain impacts on the long term due to the contingency nature of the policy and the unknown location of sites. Positive impacts for housing and employment objectives.
Housing Option 1): to deliver all	POP 2011	Rejected. This option resulted in less significant environmental impacts, however

housing within the built up area		performed the least well against the housing objective and had no significant positive impacts.
Housing Option 2): to include delivery of housing on Toads Hole Valley site.	POP 2011	Selected. This option resulted in some adverse impacts against environmental objectives, however performed positively against the housing and economic objectives and was considered to provide a balance between competing requirements of the city.
DA7 Preferred Policy Approach - delivery of a mixed use scheme including housing and employment and other uses, such as a school and open space provision, and including the Toads Hole Valley Strategic Allocation.	DCP 2012	Policy has strong positive impacts for housing and economic objectives and sets high building standards to be achieved, having positive implications against a range of environmental objectives. Policy should have positive health, community safety and reducing inequalities impacts. Some uncertainties and potential for adverse impacts associated with impacts on biodiversity, adapting to climate change, water pollution and landscape impacts.
Preferred Policy Approach, building on DCP 2012 stage above, but with some amendments, including requirement to provide jobs/training for local people, the consideration but not requirement to deliver energy infrastructure, and strengthening of text relating to reducing surface water flood risk.	SUB 2013	Policy impacts mainly as described above. More certainty over positive impacts on reducing deprivation through jobs/training opportunities, and less strong positive impact on sustainable energy objective, due to change in requirement. More possibility of positive impact against objectives relating to water pollution.
Preferred Policy Approach, building on SUB 2013 with various amendments: less strength in wording relating to being an exemplar development, providing links to the SDNP and reducing surface water flood risk; policy requires	PM 2014	Policy impacts mainly described under DCP 2012 and SUB 2013, although less strong positive impact on employment/economic development objectives due to no employment space being provided; more uncertainty against sustainable energy objective due to removal of energy infrastructure requirements; and less strong positive impact on environmental standards objective due to removal of specific standards to be achieved.

sites to be reserved for employment and school buildings and not actually delivered; removal of specific requirements to provide energy infrastructure; removal of specific environmental standards to be achieved.		
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DA8 Shoreham Harbour		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Option SH1: to support the long term regeneration of the harbour to provide jobs, homes and leisure facilities.	PO 2006	Selected. Option considered to bring about similar impacts to do nothing option including positive impacts for housing. The impacts for employment and economic development were considered to be mixed. The commitment to produce an area action plan will have more positive outcomes for local communities and provide more certainty for developers than the alternative option.
Do Nothing	PO 2006	Rejected. Similar impacts anticipated to option SH1, however rejected for reasons as stated above.
Option 1): Ad-hoc market led approach.	RPO 2008	Rejected. This option was found unlikely to lead to improvements in transport and other infrastructure, may result in piecemeal residential development and result in a missed regeneration opportunity for the area. This option was also found unlikely to provide benefits for local communities.
Option 2): to consider major regeneration at Shoreham Harbour and South Portslade with the aim to create a highly sustainable neighbourhood adhering to the latest standards for sustainable development through implementation of an Area Action Plan.	RPO 2008	Selected. This option was found to have positive implications for improving transport and other infrastructure, provide a coordinated approach to improving townscape and public realm, would provide housing including affordable units, and provide greater opportunities for employment and economic development. Adverse impacts were identified against objectives relating to coastal flood risk, climate change and resource objectives.
Option 1): Employment led	PAP 2009	Selected. This option was found to have strong positive impacts for housing and

regeneration with a number of housing and jobs to be agreed.		employment and assumes that development will provide essential infrastructure, such as flood defences and transport infrastructure. Adverse impacts anticipated for biodiversity and provision of open space.
Option 2): 5,500 dwellings	PAP 2009	Rejected. This option was found to be unviable and had adverse impacts against most objectives, based on evidence which found that this level of development would not provide the infrastructure required to make the development viable, leading to various adverse impacts including risk of coastal flooding and adverse traffic impacts.
Option 3): 8,000-8,700 dwellings	PAP 2009	Rejected. This option was found to have similar impacts to option 1, particularly with strong impacts relating to provision of housing and employment opportunities. Development at this level was found to provide a balance between homes and jobs and would provide necessary levels of development to provide infrastructure. However, due to many studies being incomplete, this option was not recommended as evidence was not in place to support this level of growth at this time.
Option 4): 10,000 dwellings	PAP 2009	Rejected. This was the South East Plan target. This option was found to have strong positive impacts for housing, however was less strong for employment and economic development due to land-take for housing. This option would not meet the aims for the area of providing an employment-led scheme. Strong adverse impacts anticipated for biodiversity, open space, and impacts associated with traffic.
Option 5): No development, reliance on windfall	PAP 2009	Rejected. This option performed negatively against most objectives and would not achieve the overall regeneration aspirations for the area.
Option A): Comprehensive large-scale regeneration scheme with land reclamation from the sea and involving significant public intervention.	SUB 2010	Neither rejected or selected. Option performed strongly against housing and employment objectives however also resulted in strong adverse impacts against environmental and health objectives. No decision made at this point pending completion of studies and what could be achieved.
Option B): Comprehensive large scale scheme, without land reclamation but involving significant public intervention.	SUB 2010	Neither rejected or selected. Option performed strongly against housing and employment objectives, although still performed negatively against a range of environmental and health objectives. Adverse impacts less significant than Option A. No decision made at this point pending completion of studies and what could be achieved
Option C): Small scale regeneration without land reclamation.	SUB 2010	Neither rejected or selected. Option resulted in positive impacts for housing and employment, however not as significant as options A and B. Adverse impacts anticipated, however not as significant as options A and B. No decision made at this

		point pending completion of studies and what could be achieved.
Sustainable Economic Development Option 4(i): No specific allocation of primary employment sites within Development Area policies.	POP 2011	Rejected. The impacts for this option were considered uncertain against environmental objectives due to the lack of information about sites, and considered to be negative against the economic objectives as would not help to promote sites or bring forward development.
Sustainable Economic Development Option 4(ii): Specific allocation of primary employment sites and their roles within Development Area policies.	POP 2011	Selected. This option considered to have more certainty for developers and the business community and had strong positive impacts for the economic objectives. Identification of sites also brings about certainty of impacts against environmental objectives.
Preferred Policy Approach building on Option 2 (RPO 2008), Option C (Sub 2010) and incorporating POP 2011 Option 4ii. Policy includes an allocation for 400 homes, additional employment floorspace and includes the South Portslade Industrial Area as a Strategic Allocation.	DCP 2012	The policy should bring about strong positive impacts for housing, employment and economic development, and use of Previously Developed Land. A range of other positive impacts including increasing access, reducing contaminated land and improving local distinctiveness. Strong adverse impacts anticipated against objectives relating to climate change and coastal flooding.
Preferred Policy Approach, building on DCP 2012 stage above, with minor amendments, including requirement to accommodate future waste-water needs.	SUB 2013	Policy impacts as described under DCP 2012 above, but now with positive impacts against the objective relating to pollution of water resources.
Preferred Policy Approach, building on SUB 2013 stage above, with some minor amendments; reduction in housing target; new requirement to maximise	PM 2014	Policy impacts as described under DCP 2012 and SUB 2013 above, in addition, with strong positive impacts against the objective relating to sustainable energy production.

opportunities for sustainable energy production and use of waste heat; clarification that Aldrington Basin is a Strategic Employment Area; stronger wording regarding improving legibility and permeability; and requirement to improve/mitigate air quality.		
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SA1 The Seafront		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PRE 3) To identify areas in need of protection, such as those at risk of long term coastal erosion and flooding.	PO 2006	Selected, however the SA recommended that the two issues of flooding and coastal defence were looked at separately and were split into the options PRE 3 and PRE 4.
SR1) To support the ongoing regeneration of the seafront south of the A259 from the Marina to Hove lagoon which encourages development of key sites.	PO 2006	Selected. The option was found to have positive impacts for economic development and tourism. The option was also found to have positive impacts for biodiversity and other environmental objectives.
1) To continue the ongoing regeneration of the seafront in an integrated and coordinated manner. Priorities set out for Western Seafront, Central Seafront, East of Palace Pier to the Marina and east of the Marina.	RPO 2008	Selected. This option had positive impacts for most environmental objectives, including biodiversity, air quality, local townscape, coastal flooding, and employment and economic development.
2) Business as usual	RPO 2008	Rejected. The option resulted in mixed impacts across most objectives and was not considered to be the most sustainable approach, particularly as there is no comprehensive policy in place that recognises all aspects of the seafront.

Preferred Policy Approach, building on RPO 2008 Option 1 above.	Sub 2010	The policy has strong positive impacts around maintaining local distinctiveness and improving health. A range of other positive impacts anticipated. Some adverse impacts, although none significant.
Preferred Policy Approach, building on Sub 2010 above and including the King Alfred Strategic Allocation to provide leisure facilities and housing.	DCP 2012	Policy continues to have strong positive impacts around maintaining local distinctiveness and health, and now also impacts positively for housing due to strategic allocation. Delivery of housing results in mixed impacts against a range of other objectives, particularly traffic and air quality, where previously the impact was positive, reflecting the anticipated increase in car movements resulting from the development.
Preferred Policy Approach, building on DCP 2012 above with various other amendments including requirements relating to the SDNP and provision of energy infrastructure.	SUB 2013	Policy continues to have impacts as described under DCP 2012 above, as well as more positive impacts on the SDNP and sustainable energy objectives.
Preferred Policy Approach, building on SUB 2013 above with some amendments; clarification that amount of residential to be delivered is a minimum amount; amendments to AQMA references; reference to MMO and forthcoming marine plan.	PM 2014	Policy continues to have impacts as described under DCP 2012 and SUB 2013, although some uncertainty relating to the wording “minimum”, as this could result in some adverse and some beneficial impacts being stronger.

SA2 Central Brighton		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
S1) To help deliver a safer city, particularly at night in areas with established night-time uses.	PO 2006	Selected. This option was found to have positive impacts for health and safety and on residents' amenity.
1) To reinforce central Brighton's role as the city's regional centre for shopping,	RPO 2008	Selected. The option performed positively against objectives relating to air quality, transport, employment and economic development, community safety and accessibility. Some adverse impacts and uncertainties although none significant.

tourism, cultural and commercial facilities. To address issues of concern for the area, including community safety and ensuring affordable workspace.		
2) Business as usual	RPO 2008	Rejected. This option resulted in more mixed impacts, with there being no existing local policy that integrates the various issues to be addressed in the policy. Adverse impacts anticipated against the health and community safety objectives.
Preferred Policy Approach, building on RPO 2008 Option 1 above.	Sub 2010	The policy has strong positive impacts on employment, economic development and local distinctiveness objectives. Other positive impacts anticipated for community safety and improving access. Adverse impacts associated with any new development, including increasing resource use, and also resulting from an increase in traffic movements.
Sustainable Economic Development Option 1(i): To identify central Brighton as the city's prime location for office accommodation and protect existing office accommodation and encourage their refurbishment and upgrade.	PAP 2011	Selected. The option has strong positive impacts against the employment and economic development objectives, and has strong impacts against the objectives relating to traffic, air quality and increasing accessibility. Policy had adverse impacts against the housing objective, and various uncertain impacts.
Sustainable Economic Development Option 1(ii): To not identify the area as the city's primary office location and leave protection of office to a generic employment policy.	PAP 2011	Rejected. The option has positive impacts against the employment and economic development objectives, however not as strong as option 1(i). The option has positive impacts against the housing objective, due to flexibility over change of use to residential. Adverse impacts anticipated for accessibility, traffic and air quality as development is dispersed to areas with less sustainable transport provision.
Preferred Policy Approach, building on Sub 2010 and incorporating POP Option 1(i) above.	DCP 2012	Policy has strong positive impacts for employment, economic development, maintaining local distinctiveness and provision of sustainable energy. Some other less significant positive as well as adverse impacts, mainly associated with new development and traffic.
Preferred Policy Approach, building on DCP 2012,	SUB 2013	Policy impacts mainly as described under DCP 2012 above. Policy now also has positive impacts for housing and strong positive impacts on the objective for

incorporating requirements around sustainable energy infrastructure and allowing residential as part of mixed use schemes		sustainable energy generation.
Preferred Policy Approach, building on SUB 2013, with new wording to refer to AQMA 2013 and stronger requirements surrounding improving/mitigating air quality.,	PM 2013	Policy impacts as described under DCP 2012 and SUB 2013 above. Mixed adverse impacts still associated with an increase in traffic.

SA3 Valley Gardens		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
1) To work with public and private sector partners to enhance and regenerate the Valley Gardens area in an integrated manner that reinforces its strategic significance, emphasises its historic and cultural character, reduces the adverse impact of traffic and creates a continuous green boulevard.	RPO 2088	Selected. This option was found to have positive impacts against the transport, air quality, local distinctiveness, employment and economic development, health and other social objectives. Some uncertain impacts were identified.
2) Business as usual	RPO 2008	Rejected. This option would not result in a coordinated approach to tackle townscape and public realm improvements in a key gateway to the city. Although this option was found to result in transport improvements, many of the other impacts were considered to be mixed.
Preferred Policy Approach, building on RPO Option 1 above.	Sub 2010	The policy was found to have strong positive impacts on objectives relating to biodiversity, local distinctiveness, and increasing accessibility. A range of other positive impacts were identified and some adverse impacts although none of significance.

Preferred Policy Approach, building on SUB 2010 above with a new priority being to create a vibrant new park for the city and enhancing biodiversity.	DCP 2012	The policy was found to have strong positive impacts against objectives relating to biodiversity, air quality and transport, local distinctiveness, health, community safety, and accessibility. Other positive outcomes anticipated. Some adverse impacts associated with new development, however none of significance.
Preferred Policy Approach, building on DCP 2012 above and adding specific energy requirements for development located in this area to consider.	Sub 2013	Policy impacts as described under DCP 2012 above, but with more potential for positive impacts for sustainable energy in the short and medium term.
Preferred Policy Approach Slight changes to text to reflect the stage (e.g. completion) of one of the schemes.	PM 2014	Impacts as described under DCP2012.

SA4 Urban Fringe		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
UF1) To support a holistic and pro-active approach to change within and management of the urban fringe.	PO 2006	Selected. This option was found to have positive impacts for the SDNP, open space provision, and health.
1) Land between the built up area boundary and the proposed South Downs National Park boundary will be protected and enhanced and the approach to assessing development proposals will be set out along with priorities for enhancement: green network opportunities; improving sustainable transport access;	RPO 2008	Selected. This option has positive impacts across many objectives, including biodiversity, air quality, local distinctiveness, protecting the SDNP, transport, water pollution, health and other social objectives. The only objective against which the impact was negative was housing.

environmental improvements; protecting groundwater and the wider landscaping role.		
2) To have no specific policy approach to the urban fringe but to rely on a combination of other proposed policies.	RPO 2008	Rejected. This option relied on implementation of other policies, however would not consider the wider landscape role of the urban fringe. Impacts were generally mixed.
3) To have a policy which would positively support development on some sites of urban fringe for housing and employment in the period 2016-2026, as part of the long term strategy for accommodating growth	RPO 2008	Rejected. This option performed positively against the housing and employment objectives. This option raised the likelihood for adverse impacts against environmental objectives. The option also generated uncertainty as at the time the exact boundary of the South Downs National Park and therefore the full extent of the urban fringe was unknown. The option put forward as SA4 protected the urban fringe from development.
4) Business as usual	RPO 2008	Rejected. The impacts related to this option were mainly mixed.
Preferred Policy Approach, based on RPO Option 1, but also incorporating elements of RPO Option 3: by allowing residential development in the urban fringe as a contingency basis, post 2020 if required.	PAP 2009	In the short and medium term, the policy was found to have a range of positive impacts including strong positive impacts for biodiversity, local distinctiveness, protecting the SDNP and preventing water pollution. In the long term, many impacts are considered to be mixed and uncertain, particularly on the environmental objectives due to the contingency position. In the long term the impact on the housing objective is more positive than the short/medium term.
Preferred Policy Approach, based on policy put forward in PAP 2009, with contingency position maintained.	SUB 2010	Impacts that were found to be mixed and uncertain under PAP 2009 above, now considered more likely to be negative, but still uncertain due to contingency position. Score also reflects the fact that the policy allows development within the urban fringe if a site is allocated in a DPD.
Preferred Policy Approach, with contingency position for housing removed, and therefore more reflective of RPO 2008 option 1.	DCP 2012 / SUB 2013	Policy considered to have strong positive impacts for maintaining local distinctiveness, protecting SDNP and preventing water pollution. Policy should also have positive impacts across all other relevant objectives. Recognised that development within urban fringe could take place if allocated in a DPD, but that the policy requires all adverse impacts to be appropriately mitigated.
Preferred Policy Approach, based on the revised Spatial Strategy, incorporating the	PM 2014 (Jul)	The policy has positive implications for the housing objective. The policy has positive impacts relating to employment and economic development due to the intrinsic link between house-building and the economy.

ability to develop a site on the urban fringe where it has been identified as having potential for residential in the Urban Fringe Assessment 2013. Supporting text amended to reflect the findings of the Study 2014 and confirmation that sites will be allocated in Part 2.		There are positive implications arising from delivery of housing for both the health and deprivation objectives, with housing being one of the determinants of health. However, overall the impacts on these objectives are considered to be mixed, due to the loss of open space which could have adverse health impacts, particularly relating to increasing health inequalities in some areas adjacent to the urban fringe site. Impacts on the majority of the environmental objectives are mixed, reflecting the positive aspirations of the policy, yet the risk associated with development on the urban fringe which would require mitigation.
Preferred Policy Approach, based on the revised Spatial Strategy which allows residential development in the urban fringe. The policy refers to Urban Fringe Assessment now being a material consideration and clarifies the process of sites as identified in the Urban Fringe Assessment as having potential being subject to the site allocation process at Part 2.	PM 2014 (Sep)	Impacts as described under PM 2014 (July) above. The wording with this version is less strong than at PM2014 July stage, however the reference to the Urban Fringe Assessment and the site allocation process indicates that development on the urban fringe, in accordance with the findings of the Assessment is still anticipated to come forward. This is supported by the commitment of 1060 homes to be delivered in the urban fringe under Policy CP1.

SA5 The Setting of the South Downs National Park		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
OS2) To conserve enhance the AONB/future SDNP.	PO 2006	Selected. This option had a range of positive impacts against all three social, economic and environmental objectives.
1) Work in partnership with SDNPA to protect and enhance the natural beauty of the Downs recognising the council's priorities for the national park land that falls within the city's	RPO 2008	Selected. This option has positive impacts for most objectives, particularly the environmental objectives. The option scored negatively against the housing objective.

administrative area.		
2) Business as usual	RPO 2008	Rejected. This option was not assessed as was not considered to be a reasonable alternative.
Preferred Policy Approach, building on RPO 2008 Option 1 above.	SUB 2010	Policy has strong positive impacts on objectives relating to biodiversity, local distinctiveness, protecting the SDNP, and preventing water pollution. Other positive impacts anticipated and no adverse impacts.
Preferred Policy Approach, building on SUB 2010 above.	DCP 2012 / SUB 2013	Impacts as SUB 2010 above.
New Policy Approach. Policy has undergone many significant changes. The main thrust of the policy is still the protection of the SDNP and there is more reference to protection of the setting, over which BHCC has more influence due to planning responsibilities. Many of the previous policy requirements have been moved and are now listed as priorities within the supporting text instead, where they carry less weight.	PM 2014	Policy has positive impacts on all relevant objectives including on biodiversity, air quality, maintaining local distinctiveness, protecting the South Downs, reducing car journeys, preventing water pollution, improving health and improving access.

SA6 Sustainable Neighbourhoods		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
SC1) To support implementation of priorities outlined in NAPs	PO 2006	Selected. This option was found to impact positively on the social objectives, particularly those relating to deprivation.
S2) To include a policy for identified neighbourhood renewal areas which supports community safety.	PO 2006	Selected. This option was found to impact positively on the social objectives.
H5) To actively support	PO 2006	Selected. This option was found to impact positively on the social objectives as well as

provision of or access to community facilities.		having potential to reduce journeys and need to travel.
SN1 1) Contribute to creating and maintaining sustainable neighbourhoods by working with partners, developers and local communities. The focus will be for viable shopping centres and parades, a good balance and mix of uses in local centres, new/enlarged community facilities provided in areas of need; appropriate mix of size and type of housing; protecting distinctive and important neighbourhood character; opportunities for safer streets; open space, sports and recreation improvements, encouraging a greater range of services and facilities for learning and training; encourage environmental sustainability improvements and encourage community engagement and neighbourhood arts.	RPO 2008	Selected. This option was found to have positive impacts across most related objectives, including air quality, local distinctiveness, housing, transport, water use, economic development and the health, community safety and deprivation objectives.
SN1 2) To identify specific neighbourhoods to prioritise improvements outlined in Option 1.	RPO 2008	Rejected. This option was found to perform negatively across the social objectives and was found less likely to ensure all neighbourhoods across the city became sustainable neighbourhoods.
SN1 3) Business as usual	RPO 2008	Rejected. This option resulted in mixed impacts as local policy currently does not contain an integrated approach to creating sustainable neighbourhoods.

SN2 1) Contribute to creating a city of opportunities by ensuring a better quality of life for the most disadvantaged communities by reducing inequalities and addressing the factors which exclude people from full engagement with community life	RPO 2008	Selected. This option has positive impacts for the social and economic objectives, as well as some of the environmental objectives. Some uncertainties around the impacts of development were raised.
SN2 2) Business as usual	RPO 2008	Rejected. There is no existing policy related to this issue. This option was found to have some adverse and mixed impacts.
Preferred Policy Approach, combining the RPO 2008 options SN1 (1) and SN2 (1) into one policy to tackle inequality in all neighbourhoods and to create sustainable neighbourhoods throughout the city.	SUB 2010	The policy has strong positive impacts for the health, community safety, deprivation and accessibility objectives, in addition to a range of other positive impacts. Some adverse impacts are anticipated, mainly linked to impacts from development such as resource consumption.
Preferred Policy Approach, building on SUB 2010 above.	DCP 2012/ Sub 2013	Policy continues to have strong positive impacts for health, safety, deprivation and accessibility objectives. Policy also has a range of other positive impacts, including those that were considered adverse at former stages due to policy requirements and priorities. Few adverse impacts anticipated.
Preferred Policy Approach building on DCP 2012/SUB 2013 above, with additional requirement for new housing to meet minimum space standards and for an appropriate mix to be provided.	PM 2014	Policy impacts as described under DCP 2012/SUB2013 above.

CP1 Housing Delivery		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting

AH1) Plan to provide new housing in accordance with the South East Plan target.	PO 2006	Selected. Although this option raised some uncertainty, as the housing target was unknown, and could therefore have adverse implications against some of the environmental objectives, that there would be significant positives for the social objectives.
CP11 Option 1) Outline the strategy for the planned location of new housing (in accordance with the South East Plan target of 570 homes annually), the mix of housing and to ensure proposals for residential development demonstrate how the additional demand for associated infrastructure and local services will be met.	RPO 2008	Selected. The development of new housing across the city raised several uncertainties and negativities towards some of the sustainability objectives, however to plan for housing needed was positive. No alternative option was put forward, as a “do nothing” option would not be acceptable as government guidance at that time set out specific requirements for the delivery of new housing within local planning authority areas.
Preferred Policy Approach, building on RPO 2008 Option 1, but allowing residential development on the urban fringe in the long term as a contingency basis.	PAP 2009	The policy has strong positive impacts for housing and health and positive impacts on some other objectives. The policy has mixed impacts on a range of environmental objectives. These mixed impacts are anticipated to become more adverse in the long term when development on the urban fringe takes place, e.g. on biodiversity, traffic, water pollution, adapting to climate change and accessibility.
Preferred Policy Approach, building on PAP 2009 and incorporating a site selection process for sites on the urban fringe.	SUB 2010	The policy has strong positive impacts for the social objectives, particularly health and housing, and positive impacts for employment and economic development. Adverse impacts are anticipated against a range of environmental objectives, which become more significant in the long term due to the release of sites on the urban fringe.
1) 9,800 new homes all within the built up area of the city.	POP 2011	Rejected. Option has positive impacts for housing but performed the least well against this objective compared to other options and was therefore not considered to be the best option.
2) 11,200 new homes mainly within the built up area of the city, and development on a greenfield site (Toads Hole Valley).	POP 2011	Selected. Option performs positively against the housing, employment and economic development objectives. Also performs positively against the health objectives. Some adverse impacts anticipated, mainly due to the release of a named Greenfield site, however SA considers that some may be overcome with appropriate mitigation.

3) 13,500 new homes with development on Greenfield site (as option 2), plus total loss of 11.5ha of employment sites and 23ha of open space to housing.	POP 2011	Rejected. Performed positively against the housing objective, more so than options 1 and 2, however performed negatively against the employment and economic development options, as well as transport, air quality and local distinctiveness due to loss of employment and open space sites, also impacting on health.
4) 15,800 new homes with development on a Greenfield site (as options 2 and 3), plus total loss of 23ha of employment sites and 46ha of open space to housing. Options 2, 3 and 4 all also included mixed use development on some employment sites and some development at Shoreham Harbour.	POP 2011	Rejected. Performed the most strongly against the housing objective, however performed the most negatively against a range of other objectives due to loss of employment sites and sites of open space. The significance of the adverse impacts considered to outweigh the benefits of delivering higher amounts of housing.
Preferred Policy Approach, building on POP 2011 Option 2 above, by directing the majority of residential development to the built up area of the city, and allowing development on a named greenfield site, by bringing that into the built up area boundary. Housing target of 11,300 homes.	DCP 2012 / SUB 2013	This policy performed positively against housing, as although less than the Objectively Assessed Need the target would still make a significant contribution towards the local housing requirement. Strong positive impacts are also anticipated against the health objective. Other positive impacts of note include impacts on employment and economic development and deprivation. A range of adverse impacts are anticipated, mainly on environmental objectives which would require mitigation at development stage. Stronger adverse impacts anticipated on traffic and air quality due to anticipated increase in car ownership and travel.
Option 1 - 13,200 units delivered including 1,000 on the urban fringe.	PM 2014 (July)	Selected. This option does not meet the OAN and therefore has mixed social impacts, including on the housing objective. This option has strong positive impacts for employment and economic development. Employment opportunities may result in positive impacts for reducing deprivation and impacts positively on health, with employment being one of the wider determinants of health. Loss of open space in the urban fringe is associated with various environmental impacts including possible impacts on biodiversity, landscape setting, water pollution, and climate change

		adaptation and would require mitigation. Loss of open space on the urban fringe could also have adverse health impacts, particularly relating to increasing health inequalities for deprived communities. Mitigation would be required.
Option 2 - meeting the OAN of 24,000 homes including, delivering 1,000 on the urban fringe; loss of 54ha of employment sites in the city and 108ha of open space from within the built up area.	PM 2014 (July)	Rejected. Option has strong positive impacts for housing. However this option would result in total loss of 39% of certain employment sites within the city and 32% of certain types of open space within the city, leading to significant irreversible adverse impacts including on the local economy and employment, but also the open space resource, biodiversity, increased transport, reduction in air quality, and most significantly on health and inequalities and would be permanent and irreversible.
Preferred Policy Approach based on SUB 2013 incorporating Option 1 (PM2 2014 Jul) stage which includes the urban fringe as a broad source of potential for housing with the potential for delivery of around 1,060 units of housing. 13,200 units of housing delivered in total, which also includes a greater allowance for windfall over the entire plan period.	PM 2014 (Jul)	Preferred Policy Approach. Policy impacts as described under Option 1 PM 2014. The policy will result in positive impacts for the economic objectives, adverse impacts for the environmental objectives and mixed impacts for the social objectives, including housing delivery, health and deprivation, but will go some way to addressing some of the housing related social issues. A range of adverse environmental impacts are anticipated which would require mitigation.
Preferred Policy Approach, based on SUB 2013 incorporating Option 1 (PM 2014 stage) which includes the urban fringe as a broad source of potential for housing with the potential for delivery of around 1,060 units of housing. 13,200 units of housing delivered in total. Reference to the site	PM 2014 (Sep)	Preferred Policy Approach, impacts as described above under PM 2014 (Jul).

allocations process and the status of the Urban Fringe Assessment in the determination of planning applications included.		
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CP2 Sustainable Economic Development & CP3 Employment Land		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
E1) To protect existing office and industrial sites, but allow enabling development on some sites.	PO 2006	Selected. This option was found to have positive impacts for the economic objectives.
E2) To allocate site capable of generating an additional 20,000m ² of office floorspace.	PO 2006	Selected. This option was found to have positive impacts for the economic objectives and would be positive for the making the best use of brownfield sites.
E3) To safeguard all non-allocated sites.	PO 2006	Selected. This option was found to be positive if combined with options 1 and 2.
E4) Encourage the creation of flexible, affordable, business space.	PO 2006	Selected. This option was found to have positive impacts for the economic objectives and would help meet growing demand for this type of workspace.
AH3) To help secure affordable housing by allowing greater flexibility on some employment sites.	PO 2006	Selected. This option was found to have overall positive sustainability benefits.
CP16 1) Identify strategic sites to safeguard and promote for certain uses. Identify New England Quarter for 20,000sqm new office floorspace. Support city's key employment sectors.	RPO 2008	Selected. This option has the most positive impacts on the economic objectives compared to alternatives and was found to make the best use of previously developed land and increase accessibility. Adverse and uncertain impacts associated with the environmental and social objectives.
CP16 2) Allocate 20,000sqm on urban fringe.	RPO 208	Rejected. This option has adverse impacts across many objectives, particularly the environmental objectives and goes against the findings of the Employment Land Study having mixed impacts on economic objectives.

CP16 3) Allow more flexibility on identified sites.	RPO 2008	Rejected. The impacts of this were mainly uncertain, particularly around whether it would result in the loss of industrial uses and would result in a lack of balance between different uses.
CP16 4) Business as usual	RPO 2008	Rejected. Impacts were broadly similar to Option 1.
CP17 1) Protect other employment sites. Where release permitted preference to live/work or affordable housing.	RPO 2008	Selected. Option has positive impacts across economic and social objectives, including the housing objective.
CP17 2) Not to protect sites	RPO 2008	Rejected. Option has adverse impacts against the economic objectives.
CP17 3) Not to specify alternative uses.	RPO 2008	Rejected. Option has adverse impacts against the economic objectives and uncertain impacts against social objectives.
CP17 4) Business as usual	RPO 2008	Rejected. Impacts were broadly similar to option 1, however option 1 encourages reinvestment and reuse of redundant sites and was therefore considered to be more sustainable.
CP16/17 Preferred Policy Approach combining CP16 (1) and CP17 (1) but also allowing employment-led mixed use development on identified sites.	PAP 2009	Policy has strong positive impacts against the economic objectives, as well as positive implications for housing, health and accessibility. Some adverse impacts identified mainly associated with delivering development.
Preferred Policy Approach CP16 – Planning for Sustainable Economic Development building on PAP 2009 policy approach.	Sub 2010	Policy has strong positive impacts against the economic objectives, as well as positive implications for housing, health and accessibility. Some adverse impacts identified mainly associated with delivering development.
Sustainable Economic Development option 3i: protection of secondary office with no preference to alternative uses.	POP 2011	Rejected. Positive impacts for economic objectives and for housing and health objectives.
Sustainable Economic Development option 3ii: protection of secondary office and preference for re-use to other employment or affordable	POP 2011	Selected. This option has the strongest positive impacts for economic objectives of all options and also has strong positive impacts for housing and health objectives.

housing.		
Sustainable Economic Development option 3iii: no protection.	POP 2011	Rejected. Adverse impacts for economic objectives, although strong positive impacts for housing.
Sustainable Economic Development option 5i: clarify protection of strategic industrial estates through identifying sites to protect and those where mixed use will be permitted.	POP 2011	Selected. This option has the strongest positive impacts of all options on objectives relating to employment, economic development, housing and health. Some adverse impacts on environmental objectives.
Sustainable Economic Development option 5ii: to not identify sites or provide hierarchy.	POP 2011	Rejected. This option has positive impacts for employment and health but various uncertain impacts against a range of environmental objectives due to uncertainty over location of sites.
Sustainable Economic Development option 5iii: to consider further flexibility around estates outlined under 5i.	POP 2011	Selected. This option has positive impacts for the economic objectives and the health objective.
Sustainable Economic Development option 6i: to protect other secondary business, manufacturing and warehouse sites.	POP 2011	Rejected. Positive impacts for economic objectives and for housing and health objectives.
Sustainable Economic Development option 6ii: to protect sites and allow re-use to employment or affordable housing.	POP 2011	Selected. This option has the strongest positive impacts for economic objectives of all options and also has strong positive impacts for housing and health objectives.
Sustainable Economic Development option 6iii: no protection.	POP 2011	Rejected. Adverse impacts for economic objectives, although strong positive impacts for housing.
Preferred Policy Approach CP2 Planning for Sustainable	DCP 2012 / SUB 2013	The policy has strong positive impacts for employment and economic development. The policy also has positive impacts on health, deprivation and accessibility. Support

Economic Development setting out how the council will encourage economic growth (building on Submission 2010 and RPO CP16 policies)		for a low carbon economy has positive implications for some of the environmental objectives. Adverse impacts anticipated relating to an increase in traffic movements.
Preferred Policy Approach CP3 Employment Land incorporating the POP options 3ii, 5i, 5iii and 6ii and indicating supply of employment land throughout Development Areas.	DCP 2012	Policy has strong positive impacts for economic objectives. Other positive impacts include health, safety, deprivation and access. Various other adverse and mixed impacts identified mainly associated with new development, and also associated with an increase in traffic.
Preferred Policy Approach CP3 Employment Land, based on DCP 2012	SUB 2013	Policy has strong positive impacts for economic objectives, although also uncertain due to the supply of employment land being less than the amount assessed as required in updated evidence base. Other positive impacts include health, safety, deprivation and access. Various other adverse and mixed impacts identified mainly associated with new development, and also associated with an increase in traffic.
Preferred Policy Approach CP3, based on DCP 2012/SUB 2013 with amendment to recognise the importance of non B-class uses to the local economy.	PM 2014	Policy impacts as described under DCP 2012/SUB 2013 above.

CP4 Retail Provision		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
R1) To direct all new retail development to existing defined centres and require edge or out of centre schemes to carry out impact assessments.	PO 2006	This option should have positive impacts for the economic objectives as well as enabling sustainable travel and impacting positively on air quality.
CP15 Option 1) Maintain and enhance current hierarchy of shopping centres. Regional	RPO 2008	Selected. This option has mixed, uncertain and adverse impacts. However, directing major new retail to a central location was considered to be the most sustainable option having positive impacts for sustainable transport and air quality.

shopping centre to be the focus of significant retail development.		
CP15 Option 2) Absorb identified retail capacity through existing centres and create new centres.	RPO 2008	Rejected. This option has mixed, uncertain and adverse impacts across a range of objectives and was found particularly to result in adverse impacts associated with traffic.
CP15 Option 3) Absorb development in edge/out of centre sites.	RPO 2008	Rejected. This option has mixed, uncertain and adverse impacts across a range of objectives and was found particularly to result in adverse impacts associated with traffic.
CP15 Option 4) Business as usual	RPO 2008	Rejected. Impacts considered to be similar to option 1.
Preferred Policy Approach, based on RPO 2008 option 1.	Sub 2010	Policy has strong positive impacts against the economic objectives and access objective. Other positive impacts anticipated against the health, deprivation and local distinctiveness objective. Adverse impacts identified mainly related to the impacts of development, as well as those associated with an increase in traffic.
Preferred Policy Approach, based on SUB 2010 above with additional requirement to carry out an impact assessment.	DCP 2012 / SUB 2013	Policy has strong positive impacts against the economic objectives and access objective. Other positive impacts anticipated against the health, deprivation and local distinctiveness objective. Adverse impacts identified mainly related to the impacts of development, as well as those associated with an increase in traffic.
Preferred Policy Approach, based on SUB 2013, with removal of District Centre status at the Brighton Marina.	PM 2014	Impacts as described under DCP 2012 above.

CP5 Culture and Tourism CP15 Heritage		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
CT1) To emphasise the importance of improving the quality of existing cultural and tourist offer.	PO 2006	Selected. This option had various positive impacts including on the economic objectives recognising the importance economic role of tourism and on maintaining local distinctiveness.
UDC4) To preserve and enhance heritage assets.	PO 2006	Selected. This option had various positive including on economic objectives, and also maintaining local distinctiveness but that this may need to be balanced with new

		environmental technologies.
CP18 Option 1 To set out the standards expected of new visitor attractions and support upgrade and enhancement of existing visitor facilities. Preserve and enhance the historic built environment.	RPO 2008	Selected. No alternative option was put forward as the current Local Plan did not reflect priorities in the refreshed Tourism Strategy or reflect good practice guidance on planning for tourism. This option was found to be compatible with all relevant sustainability objectives.
Preferred Policy Approach CP18, building on RPO option 1 above, and including additional emphasis on sustainable tourism and retaining existing facilities, art and performance space.	SUB 2010	Policy has strong positive impacts against the employment, economic development and local distinctiveness objectives. Other positive impacts anticipated against the objectives related to environmental standards. Mixed impacts against the transport and air quality objectives anticipated resulting from increase in visitor numbers.
Preferred Policy Approach (CP5) incorporating sections relevant to culture and tourism from Submission 2010 version.	DCP 2012 / SUB 2013	Policy has strong positive impacts against the employment and economic development objectives. Other positive impacts anticipated against the objectives related to environmental standards. Mixed impacts against the transport and air quality objectives anticipated resulting from increase in visitor numbers.
Preferred Policy Approach (CP15) incorporating sections relevant to heritage from Submission 2010 version and incorporating guidance on enabling heritage assets to adapt to climate change.	DCP 2012 / SUB 2013	Policy has strong positive impacts against the employment, economic development and local distinctiveness objectives. Policy also has positive impacts on the South Downs and climate change adaptation objective.

CP6 Visitor Accommodation		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
CT2) To set the strategy for protection of hotel accommodation and approach towards new hotel accommodation.	PO 2006	Selected. Recognised that new hotels may impact adversely on environmental objectives but that would impact positively on economic objectives.
CP19 Option 1) Proposals for new major hotel facilities assessed in line with policies in PPS6 and sequential approach to site selection directed to central Brighton. Hotel Core Zone defined, within which hotels and guest houses protected.	RPO 2008	Selected. This option reflected the findings of evidence and was found to have positive impacts on the economic objectives. The option was also found to have positive impacts for air quality and transport.
CP19 Option 2) To identify specific sites for new hotels.	RPO 2008	Rejected. This option did not reflect the findings of evidence which found there was not a strong need for additional hotel accommodation in the city, and could potentially result in mixed impacts on the economic objectives.
CP19 Option 3) To not have a hotel core zone and instead rely on general policy of protection.	RPO 2008	Rejected. This option resulted in a number of uncertainties, and was found to have adverse impacts against the economic objectives.
CP19 Option 4) Business as usual.	RPO 2008	Rejected. This option did not reflect findings of evidence which found that a sequential approach to sit selection may be more appropriate. This option was found to result in mixed impacts against the economic objectives.
CP18 Preferred Policy Approach based on RPO 2008 Option1, with additional priority to help encourage the creation of apprenticeships.	SUB 2010	Policy has strong positive impacts on economic objectives and a range of other positive impacts. Mixed impacts anticipated on the air quality and transport objectives.
CP6 Preferred Policy Approach, based on SUB 2010 version.	DCP 2012	Policy has strong positive impacts on economic objectives and a range of other positive impacts. Positive impacts anticipated on the air quality and transport

		objectives due to promotion of the Hotel Core Zone. Some adverse impacts anticipated attributable to new development.
CP6 Preferred Policy Approach, based on DCP 2012 version, and allowing loss to housing with certain criteria set out.	SUB 2013	Impacts similar to those as described under DCP 2012. Policy now also has positive impacts against the housing objective.
Preferred Policy Approach with minor editorial amendments.	PM 2013	Impacts as described under DCP 2012 / SUB 2013 above.

CP7 Infrastructure and Developer Contributions

Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
AH2) To secure contributions for local services and facilities. L1) To require major development to provide training opportunities. SC2) To seek contributions for community facilities where there is a shortfall S3) To require contributions for community safety improvements. PST2) For development to contribute towards sustainable transport facilities. DC1) To consider identified priorities regarding developer contributions. DC2) To include a policy for infrastructure and developer contributions.	PO 2006	Selected. All options were found to impact positively against relevant sustainability objectives and bring about wider community benefit from development.
CP9 Option 1) to require all new development to be	RPO 2008	Selected. This option was found to have positive impacts against most of the objectives. No adverse impacts were anticipated.

accompanied by relevant social and physical infrastructure.		
CP9 Option 2) Business as usual.	RPO 2008	Rejected. This option was found to result in mixed impacts across most objectives and was found to be contrary to government guidance as no up to date policy exists.
Preferred Policy Approach building on RPO 2008 Option 1 and clarifying the council's approach to achieving infrastructure to support planned amount of developments.	PAP 2009	The policy was found to have strong positive impacts against the health and deprivation objectives, and positive impacts across most other objectives. No adverse impacts were identified.
Preferred Policy Approach, building on PAP 2009 with some additional types of infrastructure including sustainable transport and renewable energy.	SUB 2010	Impacts as described under PAP 2009 above.
CP7 Preferred Policy Approach, building on SUB 2010 with additional reference to possible implementation of CIL.	DCP 2012 / SUB 2013	The policy was found to have strong positive impacts against the health and deprivation objectives, and positive impacts across most other objectives. No adverse impacts were identified.
Preferred Policy Approach, building on DCP 2012/SUB 2013 above, with minor amendments to ensure timely connection to utilities.	PM 2014	Impacts as described under DCP 2012 / SUB 2013 above.

CP8 Sustainable Buildings		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PRE1) To require developments to achieve highest standards of sustainable building design.	PO 2006	Selected. This options was found to have positive impacts against the environmental objectives although it was recognised that there may be additional costs of meeting high standards.
CP1 Option 1) To require all	RPO 2008	Selected. This option was found to have positive impacts against all of the

new development to deliver levels of building standards in advance of those set out nationally in order to avoid expansion of the city's ecological footprint and to mitigate against climate change.		environmental objectives. It was found to have mixed impacts against the housing objective as could impact on the viability of building affordable homes.
CP1 Option 2) Business as usual.	RPO 2008	Rejected. This option could result in standards being applied that do not reflect the distinctive local circumstances. This was found to result in mixed impacts against some of the social and environmental objectives.
CP1 Preferred Policy Approach, building on RPO Option 1 above, and incorporating stronger wording that requires development to achieve certain standards.	SUB 2010	The policy has strong positive impacts on the objectives relating to biodiversity, water reduction, health, energy consumption and meeting high building standards. Other positive impacts also anticipated. Adverse impacts identified against the housing objective due to the conflict between building highly sustainable and affordable homes.
CP8 Preferred Policy Approach building on SUB 2010 above.	DCP 2012	Impacts as described under SUB 2010 above.
CP8 Preferred Policy approach, building on DCP 2012 however deferring the requirements of meeting higher standards to later on in the plan period.	SUB 2013	Impacts as described under SUB 2010/DCP 2012 above for the medium and long term, although less significantly positive against some objectives in the shorter term due to relaxation in standards required to be achieved. Adverse impacts still anticipated against the housing objective, however the policy allows viability of a scheme to be a consideration.
CP8 Preferred Policy Approach, building on SUB 2013, however reducing the environmental building standards required for residential development across all timescale and removing any difference for residential development on Greenfield sites to achieve higher standards than those on PDL. Further requirements added	PM 2014	Impacts mainly as described under SUB 2013. Impacts considered to be positive across relevant objectives, including those relating to water and energy minimisation, and meeting building standards despite the change in policy. Relaxation of building standards required to be achieved impacts positively on viability and the housing objective, which is a change from the previous position. Additional requirements relating to land pollution and protection of groundwater impact positively on relevant objectives.

relating to development being required to reduce land pollution, and added protection for groundwater protection zones.		
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CP9 Sustainable Transport		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PST1) To direct development to areas of the city that have good public transport. PST3) To require transport assessments. PST4) To prioritise access in the city centre for pedestrians and public transport.	PO 2006	Selected. In combination, options found to have positive impacts for improving accessibility, reducing traffic and congestion, improving air quality and road safety.
CP8 Option 1) Outline the sustainable transport priorities for the city to ensure that future development in the city does not increase the pressure on the city's road network and encourages a shift to non car modes of transport. Ensure new development is located in areas with good transport links and responds to the demand for travel they create.	RPO 2008	Selected. This option has positive impacts against the objectives relating to air quality and reduction in car traffic, employment and economic development, the health and accessibility objectives. No adverse impacts were identified.
CP8 Option 2) To disperse development across the city rather than concentrate it on sustainable transport corridors	RPO 2008	Rejected. This option is unlikely to improve air quality or reduce car movements. This option also goes against the spatial strategy, particularly the accessibility approach.

to reduce levels of congestion.		
CP8 Option 3) Business as usual.	RPO 2008	Rejected. The results for this option were not too dissimilar from option 1 although was found to have mixed impacts against the employment objective.
Preferred Policy Approach, building on RPO Option 1, but including commitment to provide park and ride, a capital transport scheme (CTS).	PAP 2009	Policy has strong positive impacts on air quality, reducing unsustainable traffic, health and increasing accessibility. Some other positives. Unknown impacts on biodiversity and open space as a result of park and ride commitment.
Preferred Policy Approach, building on PAP 2009, with additional details on the park and ride and CTS, and commitment to prepare a policy on car free housing.	SUB 2010	Policy has strong positive impacts on increasing accessibility. Policy has positive impacts on air quality, reducing unsustainable transport employment, and health objectives. Policy has a mixture of positive/negative and uncertain impacts against a range of site specific objectives due to the commitment to deliver park and ride, including biodiversity, open space, water pollution and adapting to climate change.
Option 1) Sustainable transport policy with no park and ride and other measures developed to mitigate the impacts of increased car movements.	POP 2011	Selected. Not having park and ride avoids the potential for adverse impacts against the site specific objectives. The option has positive but uncertain impacts on the air quality and reducing unsustainable transport objectives, with the uncertainty based on there being no assessment of the effectiveness of other measures. The option has positive impacts for health and accessibility. The option has adverse uncertain impacts against the economic objectives.
Option 2) Sustainable transport policy with park and ride retained and with additional criteria for site selection. A small number of park and ride sites delivered.	POP 2011	Rejected. This option has positive impacts for air quality and reducing transport impacts, including health, and increasing accessibility. This option has potential for adverse but uncertain impacts against a range of site based objectives, including biodiversity, open space, water pollution and adapting to climate change. The impacts for employment and economic development were found to be positive.
Option 3) Sustainable transport policy with park and ride retained, but no criteria for site selection. 3-5 sites delivered.	POP 2011	Rejected. This option resulted in similar impacts to option 2, although the site specific impacts were considered to be more significant.
Preferred Policy Approach, combining options 1 and 3 of the POP, by setting out the measures developed to mitigate	DCP 2012 / SUB 2013	Policy has strong positive impacts on accessibility. Policy has a range of other positive impacts including improving air quality, reducing unsustainable transport, employment and economic development and health and deprivation. Some uncertain impacts associated with the informal park and ride on site specific objectives including

transport movements, and promoting the use of existing car parks to be used as informal park and ride.		biodiversity, water pollution and climate change adaptation.
Preferred policy Approach, building on DCP 2012/SUB 2013, with amendments including requirement for major development to implement travel plans; addition of Valley Gardens as a priority bus network route; addition of Brighton Station Gateway, Queens Road and West Street for public realm improvements to facilitate cycling/walking.	PM 2014	Policy impacts as described under DCP 2012 / SUB 2013 above.

CP10 Biodiversity		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
CP5 Option 1) Conserve and enhance biodiversity and promote increased access to green spaces through the establishment of a green network which will enable a strategic approach to nature conservation enhancement.	RPO 2008	Selected. This option has positive impacts against all relevant criteria, including those relating to biodiversity, the South Downs, sustainable transport, coastal protection and safety objectives.
CP5 Option 2) Business as usual.	RPO 2008	Rejected. This option doesn't allow the concept of a green network to be introduced or reflect local biodiversity priorities.
Preferred Policy Approach based on RPO Option 1.	SUB 2010	Policy has strong positive impacts on objectives relating to biodiversity, the South Downs, preventing water pollution and adapting to climate change. Policy has a range of other positive impacts. No adverse impacts identified.
Preferred Policy Approach,	DCP 2012 /	Policy has strong positive impacts on objectives relating to biodiversity, the South

based on SUB 2010 with additional references to the Nature Improvement Area and taking a strategic approach to nature conservation enhancement.	SUB 2013	Downs, preventing water pollution and adapting to climate change. Policy has a range of other positive impacts. No adverse impacts identified.
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CP11 Flood Risk		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PRE3) To set out how flood risk will be managed.	PO 2006	Selected. This options should have a range of beneficial impacts against the environmental and social objectives.
CP 10 Option 1) To set out the approach to managing flood risk to accord with the recommendations of the SFRA and PPS25 and ensure development incorporates where appropriate flood defences and suitable arrangements for sustainable surface water drainage.	RPO 2008	Selected. This option should have a range of positive impacts against various objectives, including environmental, economic and health objectives. This option is informed by evidence.
CP10 Option 2) Business as usual	RPO 2008	Rejected. This option does not reflect new guidance of national policy, nor reflect the findings of the SFRA. This was found to result in mixed impacts across a range of objectives.
Preferred Policy Approach based on RPO Option1, with some additional requirements including those relating reducing the risk of surface water flooding and promotion of biodiversity to reduce surface water flood risk.	SUB 2010	The policy has strong positive impacts against the objectives relating to reducing water pollution, reducing coastal flood risk and adapting to climate change. Other positive impacts identified. No adverse impacts identified.
Preferred Policy Approach,	DCP 2012/	The policy has strong positive impacts against the objectives relating to reducing

based on SUB 2010, with some updates based on the findings of the updated SFRA.	Sub 2013	water pollution, reducing coastal flood risk and adapting to climate change. Other positive impacts identified. Mixed impacts for biodiversity due to the impacts flood defence work can have on biodiversity.
Preferred Policy Approach, based on Sub 2013 with reference confirming council's role as Lead Local Flood Authority.	PM 2014	Impacts as described above.

CP12 Urban Design		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
UDC1) To raise density of development in the built up area and make the most efficient use of areas with potential for tall buildings. UDC2) Produce an urban design framework to set out areas to be preserved and those suitable for enhancement. S4) To require secure by design principles from development.	PO 2006	Selected. The options perform well against objectives such as improving health and safety, maintaining local distinctiveness and making the best of previously developed land. It is recognised that increased density may lead to increased resource use and may also impact on congestion and air quality in certain areas.
CP2 Option 1) Set out the general strategic design criteria expected of new development and to require the highest standards of design. Prepare city-wide urban design framework which will identify that have potential for taller developments. .	RPO 2008	Selected. This option impacts positively against all relevant objectives, including maintaining local distinctiveness, the economic and health objectives.
CP2 Option 2) Business as	RPO 2008	Rejected. This option does not reflect area specific opportunities for tall buildings and

usual.		does not capture local urban design. The option had mixed and adverse impacts against many objectives.
CP2 Option 3) Not to identify areas suitable for tall buildings either: treat all planning applications on their merit or reject all proposal over 6 storeys	RPO 2008	Rejected. This option generates many uncertainties and does not reflect the findings of the Tall Building Study. The option had adverse and uncertain impacts against many objectives.
Preferred Policy Approach, based on RPO Option 1 above.	SUB 2010	Policy has strong positive impacts against the objectives relating to local distinctiveness, safety, making the best use of previously developed land and increasing accessibility. A range of other positive impacts identified. No adverse impacts.
CP12 Preferred Policy Approach, based on SUB 2010 above	DCP 2012	Impacts as described under SUB 2010 above.
CP12 Preferred Policy Approach based on DCP 2012, with additional priority to protect setting of the SDNP.	SUB 2013	Policy has strong positive impacts against the objectives relating to local distinctiveness, safety, making the best use of previously developed land and increasing accessibility. A range of other positive impacts identified. No adverse impacts. Also with strong positive impacts relating to protection of the SDNP.

CP13 Public Streets and Spaces		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
UDC3) To improve quality, legibility and accessibility of public realm. PST5) To improve public realm.	PO 2006	The options perform positively on sustainability objectives including improving accessibility, having a beneficial effect on health, landscape, air quality and local distinctiveness.
CP3 Option 1) To improve the quality, legibility and accessibility of the city's public realm.	RPO 2008	Selected. This option resulted in mainly positive impacts across relevant objectives and should results in positive impacts for economic and health objectives.
CP3 Option 2) Business as usual.	RPO 2008	Rejected. This option risks losing opportunities to improve the public realm and take forward recommendations in local studies. The options resulted in mixed impacts.
Preferred Policy Approach,	SUB 2010	Policy has strong positive impacts against objectives relating to biodiversity local

building on RPO option 1 above with reference to Lifetime Homes, and emphasis on healthier lifestyles.		distinctiveness, health and accessibility. Other positive impacts anticipated. No adverse impacts identified.
Preferred Policy Approach, based on SUB 2010 above and including a priority top reduce impact of vehicular traffic.	DCP 2012 / SUB 2013	Policy has strong positive impacts against objectives relating to biodiversity, air quality, local distinctiveness, reducing unsustainable transport, health and accessibility. Other positive impacts identified. No adverse impacts identified.

CP14 Housing Density		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
CP13 Option 1) Outline the criteria for assessing the higher residential developments and in order to make the full and effective use of land set a minimum density of 50dph citywide and 100dph within Development Areas.	RPO 2008	Selected. The option has positive impacts across most objectives, including the objectives relating to housing and PDL. This option could potentially reduce the need to build on Greenfield land.
CP13 Option 2) To set lower minimum density requirements to the PPS3 minimum of 30dph.	RPO 2008	Rejected. Although this option resulted in many positive impacts, the option raised uncertainty as to whether the city's housing target could be met and would be a less efficient use of PDL.
CP13 Option 3) Business as usual.	RPO 2008	Rejected. The impacts are considered to be the same as option 1, however as no targets for density are set, option 1 was found to be preferable.
Preferred Policy Approach, building on RPO Option 1.	SUB 2010	The policy has strong positive impacts against objectives relating to housing, health and making use of PDL objectives. Also strong against the objective for maintaining local distinctiveness, although also adverse based on anticipated difficulty of providing open space for high density developments. Some other positive impacts identified. Adverse impacts anticipated mainly resulted from delivery of development.
Preferred Policy Approach, building on SUB 2010 above.	DCP 2012 / SUB 2013	Impacts as described under SUB 2010 above.
Preferred Policy Approach, building on DCP 2012/SUB	PM 2014	Impacts as described above.

2013 above, with refs to the South East Plan housing densities deleted.		
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For CP15 Heritage see CP 5

CP16 Open Space		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
OS3) To facilitate and improve access to various types of open space for a variety of purposes. OS4) To ensure future developments enhance and contribute towards provision of additional open space.	PO 2006	Selected. The options were found to have positive impacts for environmental objectives. The option may conflict against some social objectives, including provision of housing, due to competing land requirements.
CP6 Option 1) Safeguard, enhance and promote access to the city's green and open spaces and beaches and promote active living. Local open space standards for quantity, quality and accessibility will be set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of open space.	RPO 2008	Selected. This option had positive impacts across all relevant objectives including biodiversity, air quality, local distinctiveness, the South Downs National Park, reducing car journeys, employment and economic development, health, community safety, reducing deprivation and increasing accessibility.
CP6 Option 2) Business as usual.	RPO 2008	Rejected. This option had positive impacts for biodiversity, but had no other impacts. This option was found to be contrary to national guidance which seeks to ensure that open space is retained/ provided and expects local authorities to undertake open

		space, sports and recreation facility assessment and to develop local standards and policies.
Preferred Policy Approach (CP6) building on RPO Option 1 with changes signifying completion of the Open Space Sports and Recreation Study, including amended quantity and accessibility standards.	SUB 2010	The policy has strong positive impacts for biodiversity, maintaining local distinctiveness, protecting the SDNP, minimising pollution to water, health, and adapting to climate change. Other positive impacts also anticipated. Policy has potential for adverse impacts on the housing objective due to conflict over competing land requirements.
Preferred Policy Approach based on SUB 2010 above, with policy one of retention, enhancement and creation, however with clear criteria for when loss is acceptable.	DCP 2012 / SUB 2013	Policy has impacts as described above. In addition, policy also found to have strong positive impacts for increasing accessibility.
Preferred Policy Approach, based on SUB 2013, however allowing residential development on the urban fringe, on site identified in the Urban Fringe Assessment 2014.	PM 2014 (jul)	Policy now has mixed impacts on biodiversity, maintaining local distinctiveness, minimising pollution to water, reducing deprivation, and adapting to climate change. Policy has positive impacts for air quality, housing, transport, employment, health, health and safety and accessibility. Policy has adverse/uncertain impacts on the SDNP. Adverse impacts mainly considered to be localised in nature. Adverse impacts due to potential loss of open space to residential development which will require mitigation.
Preferred Policy Approach, based on SUB 2013 and PM2014 (jul), however referring to the findings of Urban Fringe Assessment which identifies open space sites as having potential for residential development, and confirming the status of the Assessment in the determination of planning applications.	PM 2014 (sep)	Policy wording relating to development on the urban fringe is less strong than the PM 2014 (July) version, however the reference to the status of the Urban Fringe Assessment, and the confirmation that sites will be allocated at Part 2, still indicates that residential development is likely to come forward in this location, with associated impacts.

CP17 Sports Provision		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
H2) To support provision or expansion of community, health, sports and recreation facilities.	PO 2006	Selected. This option had positive impacts, particular for the social and health objectives.
CP7 Option 1) To safeguard, enhance and promote access to the city's sports and recreation facilities.	RPO 2008	Selected. This option had the most potential for positive impacts, including for biodiversity, air quality, local distinctiveness, employment, health, community safety, deprivation and increasing accessibility.
CP7 Option 2) Business as usual	RPO 2008	Rejected. This option had some positive impacts, including those on biodiversity, air quality and transport, employment, health and accessibility. However this option was found to be contrary to national guidance which seeks to ensure that sport and recreation facilities are retained/ provided and expects local authorities to undertake open space, sports and recreation facility assessment and to develop local standards and policies.
Preferred policy Approach, building on RPO 2008 Option 1, with amendments to standards signifying completion of adopted Open Space, Sports and Recreation Study.	SUB 2010	The policy has strong positive impacts for health, and deprivation. The policy also has a range of other positive impacts. Some adverse impacts are identified, mainly attributed to building of new development, but also on housing, due to competing requirements over land use.
Preferred Policy Approach building on SUB 2010 above, with policy one of retention, enhancement and creation, however with clear criteria for when loss is acceptable.	DCP 2012 / SUB 2013	Policy impacts as described under SUB 2010 above.
Preferred Policy Approach building on DCP2012/SUB2013, with additional criteria that permits development on an	PM 2014 (jul)	Policy will have mainly positive impacts, including for health and deprivation, with positive impacts for housing. Negligible impacts arising from the potential for development on outdoor sports due to limited extent of the loss.

outdoor sport site only if it has been identified in the Urban fringe Assessment 20140, plus updates to amount of open space that will be required to meet the future population's needs.		
Preferred Policy Approach, building SUB 2013/PM2014, with additional reference to the Urban Fringe Assessment being a material consideration, plus updates to amount of open space that will be required to meet the future population's needs.	PM 2014 (sep)	Impacts as described under PM2014 above.

CP18 Healthy City		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
H1) To require HIA from major developments. H2) To support provision or expansion of community health facilities. H3) To encourage design that promotes health safety and active living for residents. H4) To actively support provision of or access to community facilities.	PO 2006	Selected. Options have beneficial impacts on a range of objectives including transport and accessibility, as well as the social objectives, including health and deprivation.
CP4 Option 1 Ensure developments and programmes and strategies are	RPO 2008	Selected. Overall the option has positive impacts on all objectives of relevance, including the health objectives.

tested to ensure they reduce adverse impacts on health, maximise positive impact on health and promote health, safety and active living for all age groups. Safeguard allotments and encourage joint working with health providers.		
CP4 Option 2 Business as usual	RPO 2008	Rejected. Current local policy does not include a Healthy City policy and therefore there is no formal requirement for HIA. This option was found to not promote the healthy city agenda and have mixed impacts on the health objectives.
Preferred Policy Approach, building on RPO Option 1, with some additional references and updates.	SUB 2010	Policy has strong positive impacts on objectives relating to health, deprivation and accessibility. Some other positive impacts identified. No adverse impacts identified.
Preferred Policy Approach, building on SUB 2010 approach above.	DCP 2012 / SUB 2013	Policy has strong positive impacts on objectives relating to health, deprivation and accessibility. Some other positive impacts identified.
Preferred Policy Approach, building on SUB 2013 above, including reference to lifetime neighbourhood, and reference to air quality and requirement for development to protect and improve air quality.	PM 2014	Impacts as described above.

CP19 Housing Mix		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
There was no separate policy for Housing Mix until Draft City Plan 2012. Housing Mix was covered under the general	RPO 2008 SUB 2010	n/a

housing policy at RPO and SUB 2010 stages.		
Preferred Policy Approach – policy sets out preferred mix of housing, in terms of type, size and tenure that meets the city’s needs, including specific groups of people, including smaller households, family households and disabled people.	DCP 2012 / SUB 2013	Policy has strong positive impacts for the housing and health objectives. Some other positive impacts identified. No adverse impacts identified. The developmental impacts associated with delivery of housing are assessed under CP1.
Preferred Policy Approach building on DCP 2012 / SUB 2013 above, with confirmation that dwelling space standards will be introduced in Part 2 of the City Plan.	PM 2014	Policy impacts as described under DCP 2012 / 2013 above.

CP20 Affordable Housing		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
AH4) To increase the proportion of affordable housing required from new development.	PO 2006	Selected. Although this option will bring beneficial impacts relating to increasing affordable housing provision, it is noted that the amount delivered was unlikely to meet demand, resulting in an increasing shortfall of affordable housing.
CP 12 Option 1) To set out a plan wide target to secure an annual average of 230 units of affordable housing over the plan period from all mechanisms. Informed by an updated Viability Study, the council will negotiate with developers to secure up to a 40% element of affordable	RPO 2008	Selected. The SA concluded that option 1 would be the most sustainable as this would reflect the nature of housing sites available for housing in the city. This option has positive impacts against the objectives for housing, economic development, the health and deprivation objectives. Uncertainty was expressed as to whether the cost of providing affordable housing may conflict with the cost of providing sustainable homes.

housing on all larger (10+) development sites with criteria set out to assess the proportion and type of affordable housing proposed informed by up to date assessments of local housing needs and site/neighbourhood characteristics.		
CP 12 Option 2) To have a higher percentage target of affordable housing provision than the current Local Plan 40% for sites capable of delivering 10 units or more.	RPO 2008	Rejected. The SA concluded that option 2 would not be a viable option as the 2007 Affordable Housing Viability Study found that this would stretch viability too far and may therefore jeopardise development. Although the impacts on the health objectives were positive, the other impacts were all uncertain.
CP12 Option 3) To include a requirement for affordable housing for sites less than 10 units in size.	RPO 2008	Rejected. Whilst the option of a 'sliding scale' of contributions to affordable housing was recommended by the 2007 Viability Study, the Strategic Housing Market Assessment (2008) suggested that the cost and resource implications of negotiations would need to be weighed against the financial contributions to affordable housing of this approach. This option generated much uncertainty, and was similar to Option 2 in impacts.
CP12 Option 4) Business as usual.	RPO 2008	Rejected. Although this option generated similar impacts to option 1, adopted policy does not reflect findings of updated studies and the impacts on employment and economic development were considered to be uncertain.
Preferred Policy Approach, building on RPO 2008 Option 1 above, and clarifying that the council will seek up to 40% affordable housing in each development scheme.	SUB 2010	Policy has strong positive impacts on the objectives relating to housing and health, and positive impacts on employment, economic development, safety and deprivation and some other objectives. Some adverse impacts anticipated associated with the delivery of new development.
Preferred Policy Approach, combining the approaches of	DCP 2012 / SUB 2013	Impacts similar to those as described under SUB 2010 above, with strong positive impacts still anticipated for the housing and health objectives, and adverse impacts

<p>RPO 2008 Option 1, requiring a target of 40% affordable on schemes delivering 15+ units, as well as one of the rejected options, option 3 from RPO 2008, which requires a sliding scale of affordable housing contributions from smaller schemes, (30% for 10-14 units and 20% for 5-9 units) to reflect the findings of updated evidence and studies.</p>		<p>associated with the delivery of new development. The SA found that the inclusion of contributions from smaller schemes would make a valuable contribution in the city, given that many schemes are “smaller” within the definition of the policy.</p>
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<p align="center">CP21 Student Housing and Houses in Multiple Occupation</p>		
<p>Option/Alternatives Considered</p>	<p>Stage of preparation</p>	<p>Reasons for rejecting/selecting</p>
<p>A1) Adopt an Article 4 Direction to manage HMO accommodation</p>	<p>POP 2011</p>	<p>Selected. This option had positive impacts for local distinctiveness, health and engagement. The impacts on housing were mixed, although the positive impacts relating to this housing (in terms of retention of family-type housing) on balance were considered to outweigh the adverse impacts relating to housing (in terms of less HMOs being available in the private rental sector). A range of adverse impacts were identified relating to displacement into neighbouring wards and increasing resource use.</p>
<p>A2) Do not adopt an Article 4 Direction or manage HMO</p>	<p>POP 2011</p>	<p>Rejected. This option has positive impacts for air quality and transport as will minimise risk of student displacement away from bus corridors. However the option has adverse impacts on maintaining local distinctiveness and health as will result in further studentification in areas already suffering with this problem. The impacts on housing were mixed, although on balance the adverse impacts on housing (relating to loss of larger sized properties from existing housing stock) were considered to outweigh the benefits (in terms of maintaining HMOs as a source of housing within the private sector).</p>
<p>B1) No policy for new purpose built student accommodation</p>	<p>POP 2011</p>	<p>Rejected. This option had some positive impacts for employment and economic development however the majority of the impacts were adverse or uncertain. In particular, the option was found to have adverse impacts for housing and health due</p>

		to continued reliance on HMOs to meet student housing needs.
B2) Criteria based policy for new student accommodation	POP 2011	Rejected. This policy had more potential for positive impacts than option B1, but less than B3. The option has positive impacts for maintaining local distinctiveness, housing, health, as should reduce reliance on HMO sector. Also has positive impacts for employment and economic development. A range of uncertain impacts on site specific objectives potentially resulting from development.
B3) Criteria based policy for new student accommodation with potential sites identified	POP 2011	Selected. This option has the most potential for positive impacts. It has positive impacts for local distinctiveness, housing and health, employment and economic development, as should reduce reliance on HMO private rental sector and provides certainty for developers through the identification of sites. Positive impacts on some site specific objectives, due to the sites identified, although adverse impacts associated with objectives relating to resource use. Overall, this option provides more certainty.
Preferred Policy Approach, combining options from POP 2011 stage A1 and B3, through implementing an Article 4 Direction on 5 wards of the city and through setting a criteria based policy for purpose built student accommodation and naming 5 strategic sites where student accommodation will be permitted.	DCP 2012 / SUB 2013	The policy has strong positive impacts for maintaining local distinctiveness and housing. The policy also has a range of positive impacts including on some site specific objectives (such as biodiversity) employment and economic development and health. Some adverse or mixed impacts identified, relating to air quality and transport as well as resource use.
Preferred Policy Approach, building on DCP 2012 / SUB 2013 above, with amendments to confirm that purpose built student housing will not be supported on allocated housing sites and confirmation that HMO requirements apply to new build HMOs.	PM 2014	Policy impacts as described above.

CP22 Traveller Accommodation		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
CP14 Option 1) Provision will be made to meet the local need for gypsy and traveller caravan pitches in accordance with the South East Plan targets. Set out the relevant planning considerations and criteria for the location of gypsy and traveller sites which may be used to guide the formal consideration and allocation of sites.	RPO 2008	Selected. The option has positive impacts across most objectives including air quality, transport, health, safety, deprivation, engagement and accessibility. Some mixed impacts were anticipated on objectives relating to biodiversity, the SDNP and water pollution due to the potential location of sites.
CP14 Option 2) Business as usual.	RPO 2008	Rejected. This option resulted in a range of mixed impacts and was not considered to be a viable option given that government guidance required provision of gypsy and traveller sites.
Preferred Policy Approach, building on RPO Option 1 above.	SUB 2010	The policy has positive impacts on all relevant objectives, with strong positive impacts for health and accessibility. Positive impacts anticipated for site based objectives due to inclusion of site selection criteria.
Preferred Policy Approach, building on SUB 2010 above.	DCP 2012 / SUB 2013	Impacts as described under SUB 2010 above.

Appendix G Cumulative Impacts

The following tables show the likely impacts of the area based policies and the citywide policies on each of the sustainability appraisal objectives in the long term. Impacts for policies that have changed from the submission version are shown in **bold** font.

Table G1 Area based policies

		Sustainability Objectives																					
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste
Area Based Policies	DA1	+	-	+			-	+	-	+		++	++	-/+	+	+	+	+	+	-	+	-	
	DA2	-/+	--	-/?	?	++	--	-	-	+	--	++	++	-/+	+	+	+	+	++?	--	-	++	-
	DA3	+?	-	-/+	+	++	--	-/+	-	+		++	++	-/+	+	+	+	-/+++	+	-/+	-/+	++	-
	DA4	+	-	-/+		++	-	-	-	+		++	++	-/+	+	+	+	+	++	-	-	++	-
	DA5	+	-	-/+		++	-	-	-	+		++	++	-/+	+	+	+	++	++	-/+	-	++	-
	DA6	+	-	+		++	-	+	-	+		++?	++?	-/+	+	+	+	++	+	-/+	-	++	-
	DA7	-?	-	+	+?	++	--	+	+	?		+	+	+	+	+	+	-	++?	-	+	+	-
	DA8	-?	-	+	?	++	-	-/+	-	+	--	++	++	-/+	+	+	+	++	++	--	-	+	-
	SA1	-/+	-/+	++	+	++	-/+	+	-	?	+	+	+	++	+	+		+	+	+	-	+	-
	SA2	+?	-/+	++		+	-	-	-			++	++	-/+	+				++	-	-	+	-
	SA3	++	++	++			++	+	-			+	+	++	++	+	++	+	+	+	-	++	-
	SA4	-/+?	+	--/+?	-/+?	+	-/+?	-/+?	-	++?		+	+	-/+?		-/+?	+		-	-/+		-/+?	
	SA5	+	+	++	++		+	+				+	+	+			+					+	
	SA6	+	+	+		+	+	-	+	?		+	+	++	+	++	++	+	+	+	+	++	-

Table G2 Citywide policies

		Sustainability Objectives																						
		1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste	
Citywide Policy	CP1	-?	--	--?	-?	-/+	--	--	-	?	-	+	+	-/+	+	-	+	+	+	--	-	-/+	-	
	CP2		-				-					++	++	+					+	+		+		
	CP3	-/+?	-	-/+	-?	+	-/+	-	-/+	+?	-	++?	++?	+	+	+		+	+	-	-	+	+	
	CP4	-	-	+		-	-	-	-			++	++	+		+			+	-	-	++	-	
	CP5		-/+	+	+		-/+		+			++	++						+	+	+	+	-	
	CP6	-	+	+	+	+?	+	-	-			++	++					+	+	-	-		-	
	CP7	+	+	+	+	+	+	+	+		+	+	+	++	+	++			+	+			+	
	CP8	++	+				+	++	++	+				++		+		+	++	+	++		+	
	CP9	?	+	?	?		+	?				+	+	+	+	+	+			?		++		
	CP10	++	+	+	++			++			+			+				+		++				
	CP11	-/+		+				++			++	+	+	+	+					++		+		
	CP12	+	+	++	++		+					+	+	+	++	+		++		+	+	++		
	CP13	++	++	++			++					+	+	++	+	+	+	+		+		++	+	
	CP14	+	-	-/+	+	++	-	-	-		+	+	+	++	+	+		++	+	-	-	+	-	
	CP15			++	+				+			++	++				+			+				
	CP16	-/+	+	-/+	-?	+	+	-/+			+	+		++	+	-/+				-/+		-/+		
	CP17		+	+		+	+	-				+		++	+	++	+	+				+	-	
	CP18	+	+	+			+							++	+	++	+					++		
	CP19					++						+	+	++		+		+						
	CP20	-	-	-		++	-	-	-		-	+	+	++	+	+	+	+	+	-	-	+	-	
	CP21	+	-/+	++	-/+?	++	-/+	+	-	+?	+	+	+	+	+	+?	+	+	+	-	+?	+	-	
	CP22	+		+	+	+		+						++	+		+			+		++		

Appendix H Revised Monitoring Table

New or revised indicators are shown in **bold font**.

SA Objective	Indicator	Data Type/Source
1) To prevent harm to and achieve a net gain in biodiversity	Number and area of designated sites (SAC, SSSI, SNCI, LNR, AONB, RIGS).	Contextual Indicator www.natural-england.gov.uk
	Percentage of area of SSSI land in (a) favourable condition (b) unfavourable recovering condition (c) unfavourable no change condition (d) unfavourable declining condition (e) area part destroyed / destroyed	Contextual Indicator www.natural-england.gov.uk
	SQM of habitat or biodiversity features added or lost (citywide) as a result of development	Significant Effects Indicator Sustainability Checklist
2) To improve air quality	Percentage of monitoring sites which indicate an improvement in levels of NO2 from previous year	Significant Effects Indicator BHCC Environmental Health team
	Percentage of monitoring sites which indicate that levels of NO2 exceed the National Air Quality Objective	Significant Effects Indicator BHCC Environmental Health team
	Change in extent of AQMA in Brighton & Hove	Significant Effects Indicator BHCC Environmental Health team
3) To maintain local distinctiveness	Number and % of Listed Buildings that are Grade 1 and 2* (a) on at risk register (b) subject to unauthorised alterations (c) subject to demolition (d) successful enforcement action	Significant Effects Indicator BHCC Design & Conservation team
	Amount of open space created or lost (citywide) as a result of development (Sustainability Checklist)	Significant Effects Indicator Sustainability Checklist
4) To protect, conserve and enhance the South Downs	Number of bus services that operate to the South Downs from Brighton & Hove	Contextual Indicator BHCC Transport team
	Amount of land under: 1) Entry level 2) High level environmental stewardship schemes	Significant Effects Indicator Natural England

SA Objective	Indicator	Data Type/Source
5) To meet the essential need for decent housing	Net additional housing completions	Significant Effects Indicator Authority Monitoring Report
	Net affordable housing completions	Significant Effects Indicator Authority Monitoring Report
	House price to income ratio	Significant Effects Indicator Land Registry/Nomisweb
	% of households considered to be suffering from over-crowding (having one less bedroom than required)	Significant Effects Indicator Census/ONS
6) To reduce the amount of private car journeys	Car ownership per household	Contextual Indicator Census
	Annual average daily traffic flow: (a) Outer cordon sites: 5, 22, 608 and 620 (b) City centre cordon sites: 74, 800, 809, 813	Significant Effects Indicator BHCC Transport team
	Annual average daily cycle flow: (a) National Cycle Route 2 sites: 957, 966 (b) National Cycle Route 90 sites: 960, 961	Significant Effects Indicator BHCC Transport team
	Percentage of development where parking is provided for bicycles.	Significant Effects Indicator Sustainability Checklist (SPD08)
	Percentage of residential units delivered that are car-free	Significant Effects Indicator Planning Strategy
	CO2 emissions per capita from road transport (kt)	Significant Effects Indicator (DECC)
7) Minimise the risk of pollution to water resources	Status of the groundwater resource as measured by the requirements of the Water Framework Directive.	Contextual Indicator Environment Agency
	Quality of bathing water	Contextual Indicator Environment Agency
	Percentage of new development incorporating SUDS within the development or beyond the development area.	Significant Effects Indicator Sustainability Checklist (SPD08)
8) Minimise water use in all development	Per capita domestic consumption of water	Contextual Indicator

SA Objective	Indicator	Data Type/Source
	Percentage of new development incorporating measures to reduce water consumption.	Significant Effects Indicator Sustainability Checklist (SPD08)
9) Promote the sustainable development of land affected by contamination	Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act.	Significant Effects Indicator Environmental Health Team
10) Manage coastal defences and minimise coastal erosion and flooding	Number of developments in a flood risk areas granted contrary to the advice of the Environment Agency	Single Data List: 243-01 Authority Monitoring Report
11) To balance the need for employment creation	Level of GVA per head	Contextual Indicator
	Amount (£) of developer contributions secured for training for local residents, through the Local Employment Scheme	Significant Effects Indicator Planning Strategy
	Number and percentage of in-commuters compared to out-commuters	Significant Effects Indicator (ONS Annual Population Survey /Census)
12) To support initiatives that combine economic development with environment protection	Proportion of VAT registered businesses per 10,000 population	Contextual Indicator
	Percentage population that are in employment	Contextual Indicator
13) To improve the health of all communities	Life expectancy at birth (males, females - years)	Contextual Indicator www.sepho.org.uk
	Obesity among primary school in year 6 (percentage)	Contextual Indicator City Performance Plan.
	Adult participation in sport (percentage)	Contextual Indicator City Performance Plan.
	Under 18 conception rate	Contextual Indicator City Performance Plan.
	Alcohol-harm related hospital admission rates (per 1000 population)	Contextual Indicator City Performance Plan.
	Smoking quitters per 100,000 population	Contextual Indicator City Performance Plan.
14) To integrate health and	Number of total police recorded crimes.	Contextual Indicator

SA Objective	Indicator	Data Type/Source
safety considerations		BHCC Community Safety Team
	People killed or seriously injured in road traffic accidents	Contextual Indicator City Performance Plan.
15) To narrow the gap between the most deprived areas and the rest of the city	Percentage of population living in the 20% most deprived super output areas in the country	Contextual Indicator Index for Multiple Deprivation
	Percentage of population over 60 who live in households that are income deprived	Contextual Indicator Index for Multiple Deprivation
	Tackling fuel poverty - Percentage of people receiving income based benefits living in homes with a low energy efficiency rating	Contextual Indicator City Performance Plan.
	Percentage of young people who are not in employment, education or training (NEET);	Contextual Indicator City Performance Plan.
	Percentage of non-decent council homes	Contextual Indicator City Performance Plan.
	Percentage of population living in 20% most deprived Super Output Areas(health domain)	Significant Effects Indicator Index for Multiple Deprivation
16) To engage local communities in the planning process	Number of adopted DPDs or SPDs that have incorporated periods of public consultation	Significant Effects Indicator Planning Strategy & Projects Team
17) To make the best use of previously developed land	Percentage of new and converted dwellings on Previously Developed Land	Core Output Indicator H3 Authority Monitoring Report
	Percentage of new employment land on Previously Developed Land	Core Output Indicator BD2 Authority Monitoring Report
	Percentage of development situated on Greenfield land.	Core Output Indicator Authority Monitoring Report
18) To maximise sustainable energy use	Kt of CO2 emitted from domestic sources for energy provision per capita	City Performance Plan DECC
	Average annual domestic consumption of gas and electricity	City Performance Plan DECC
	Average annual commercial and industrial consumption of gas and electricity	City Performance Plan DECC
	Percentage increase in home energy efficiency	HECA Report

SA Objective	Indicator	Data Type/Source
	Renewable energy generation.	Core Output Indicator (E3) Authority Monitoring Report
19) To ensure developments have taken into account the changing climate	Percentage of new development incorporating green walls/roofs.	Significant Effects Indicator Sustainability Checklist (SPD08)
20) To encourage new developments to meet Code for Sustainable Homes or BREEAM standards	% of new non-residential development meeting the minimum standards as required by BH.	Significant Effects Indicator Sustainability Checklist (SPD08)
21) To promote and improve integrated transport links and accessibility	Percentage of development that allow good safe and direct access between the development and local schools, employment, shops GP surgeries and leisure facilities.	Significant Effects Indicator Sustainability Checklist
22) To reduce waste generation	Tonnes of Municipal Solid Waste produced per annum	Contextual Indicator BHCC
	Tonnes of Commercial and Industrial Waste produced per annum	Contextual Indicator BHCC
	Tonnes of Construction and Demolition Waste produced per annum	Contextual Indicator BHCC
	Residual household waste per household	City Performance Plan
	Percentage of household waste: (a) recycled (b) composted (c) used to recover heat, power, and other energy sources	Contextual Indicator BHCC
	Percentage of development providing facilities for recycling.	Significant Effects Indicator Sustainability Checklist (SPD08)

Appendix I Meeting the Requirements of the SEA Directive

SEA Requirement	Submission SA 2013	Addendum SA 2014
(a) an outline of the contents, main objectives of the plan and programme and relationship with other relevant plans and programmes	Section 1 – background to Plan. Section 4 – relevant sustainability issues. Appendix A – full list of plans, programmes and strategies reviewed.	Section 3 – Additional plans, programmes and strategies of relevance.
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4 – current state of environment and sustainability issues identified. Section 7 – sets out how assessment of options included a Business as Usual approach. Appendix B – current state of the environment	Section 3 – Sustainability Issues summarised. Appendix F – includes summary of Business as Usual Assessments
© the environmental characteristics of areas likely to be significantly affected	Section 4 – current state of environment and sustainability issues identified, supported by Appendix B. Section 5 – SA objectives include the need to protect environmental assets.	
(d) any existing environmental problems which are relevant to the plan including, in particular, those relating to areas of environmental importance, such as those designated in pursuant to Directives 79/409/EEC and 92/43/EEC	Section 4 – current state of environment and sustainability issues identified, supported by Appendix B. Section 5 – SA objectives include the need to protect environmental assets.	Habitats Regulations Assessment updated and undertaken separately. Findings summarised in Section 3.
(e) the environmental protection objectives, established at international community or member state level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 2 – the need to implement sustainable development. Appendix A – full list of plans, programmes and strategies reviewed. Section 3 – outlines how the plans have been taken into account. Section 4– outlines how the plans have been taken into account.	
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage landscape and the interrelationship between the above factors	Section 5 – sets out the objectives that cover all of the issues listed. Section 8 and Appendix D – show the assessments identifying possible effects. Section 10 – shows the assessment of Cumulative Impacts. Earlier SA reports show assessments of emerging and draft policies.	Section 4, 5, 6, and Appendix C and E shows the assessments of options and proposed modifications. Section 8 and Appendix G show the Cumulative Impacts.
(g) the measures envisaged to prevent, reduce and as fully possible offset any significant adverse effects	The process of mitigation is incorporated into the SA of the City Plan during various iterations.	Mitigation for relevant policies shown in Section 7.

on the environment of implementing the plan	Details for some policies shown in Section 8.	
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered	Section 7 shows how the assessment of options including a Business as Usual Approach. Earlier SA reports contain details on SA options and assessment. Section 4 sets out difficulties in undertaking assessment.	Appendix F sets out the selection and rejection of all alternatives considered throughout the various stages of the Core Strategy / City Plan.
(i) a description of the measures envisaged concerning monitoring	Section 11 shows the monitoring proposals.	Section 9 and Appendix H show the monitoring proposals.
(j) a non technical summary of the information	Separate NTS available.	Separate NTS available.
Taking the environmental report and results of consultations into account in decision making.	Recommendations for most sustainable options taken into account at all stages. Recommendations for changes to policies taken into account at all stages. All iterations of the SA have been subject to consultation, the results of which have fed into the proceeding version where relevant.	Recommendations for most sustainable options taken into account, and recommendations for changes to policies taken into account. Results of consultation on Submission SA can be found in Appendix A.



**Brighton & Hove
City Council**

Proposed Submission City Plan Part One

Brighton & Hove City Council's Local Development Framework

February 2013

Sustainability Appraisal



Brighton & Hove
City Council

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Section 1 Introduction

1.1 Introduction

- 1.11 This document forms the Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment Directive (SEA Directive), of the City Plan Part 1 Development Plan Document. The City Plan Part 1 sets out the council's strategic planning policies for the city up to the year 2030.
- 1.12 This document will:
- State why an integrated SEA / SA is required
 - Describe the SEA / SA process and stages undertaken so far
 - Undertake Stages (f), (g) and (h) of Annex 1 of the SEA Directive and Stages B, C and D of the Sustainability Appraisal.¹
 - Provide further information on stage (i) of Annex 1 of the SEA Directive and stage B6 of the Sustainability Appraisal.

1.2 Proposed Submission City Plan Part 1

- 1.21 The City Plan Part 1 is the first Development Plan Document to be produced as part of a set of wider planning policy documents known as the Brighton & Hove Local Development Framework. Its purpose is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the city and has an important role in ensuring that other citywide plans and strategies achieve their objectives.
- 1.22 The City Plan Part 1 sets out how the council will respond to local priorities; how it will meet the social, economic and environmental challenges that face the city; and how it will work with partners to reduce inequalities. It identifies the broad locations, scale and type of development and supporting infrastructure that will take place in the city. The City Plan also responds to and provides for the needs of a growing population and a growing local economy and reflects the role and importance of the city in the sub-region and the south east.

1.3 Requirement for SA/SEA

- 1.31 The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal for all Development Plan Documents. As the City Plan Part 1 is subject to preparation and adoption by a local authority, determines the use of a small area at local level and is likely to have a significant effect on the environment, a Strategic Environmental Assessment, in accordance with European Directive EC/2001/42, is also required. The National Planning Policy Framework also requires that a Sustainability Appraisal, incorporating the requirements of the SEA Directive, is integral to the plan making process.
- 1.32 The Sustainability Appraisal (SA) plays an important part in demonstrating if a local Development Plan Document is sound by ensuring it reflects sustainability objectives. The purpose of the SA is to promote sustainable development (as

¹ These stages of the SEA Directive and Sustainability Appraisal have been combined as suggested by guidance set out in the Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (2005). The stages are explained in more detail in the methodology section.

defined by the UK Sustainable Development Strategy 2005) through the integration of social, environmental and economic considerations into the DPD. The preparation of the City Plan Part 1 is carried out in parallel with the SA and both are subject to consultation. The role of the SA is to ensure decision makers are better informed of the sustainability aspects of the plan and to ensure that the environmental, economic and social impacts of the plan are understood and have been considered.

- 1.33 Strategic Environmental Assessment (SEA) is a procedure required by the European Directive 2001/42/EC. The SEA Directive aims to introduce a systematic assessment of the environmental effects of strategic land use related plans and programmes.
- 1.34 Whilst SEA only assesses the impact of plans on the environment, SA assesses the sustainability of a plan, therefore encompassing environmental issues, as well as social and economic issues. The requirements of SEA and SA can be merged to allow for one single joint appraisal which is set out in Section 3 Methodology.

1.4 Progress

- 1.41 The council prepared a Scoping Report in 2005 that set out the baseline of the city with regards to environmental, economic and social issues of relevance. The report also identified the sustainability framework that has been used to assess the options and policies found in previous versions of the Core Strategy as well as in this version of the City Plan and set out the sustainability objectives that may have had a bearing on the document.
- 1.42 The council has progressed work on the City Plan Part 1 through various iterations of the document, which have been accompanied by a Sustainability Appraisal at all stages. Further information regarding the various stages of development of the former Core Strategy and this City Plan, and Sustainability Appraisal can be found in Section 6.
- 1.43 The city council produced the draft City Plan Part 1 in May 2012 which was subject to consultation under Regulation 18. Representations received during the consultation period have been taken into account, with some changes to policies undertaken.
- 1.44 This Sustainability Appraisal Report assesses the policies contained within the Proposed Submission City Plan Part 1, which have changed significantly since the draft City Plan Part 1 was published for consultation in May 2012.
- 1.45 This report also contains the assessment of options for new policies, and the new draft policies contained within the Proposed Submission City Plan.
- 1.46 This report also includes an assessment of the Cumulative Impacts of all policies.

Section 2 Background – Sustainable Development

2.1 International

- 2.11 In 1987 the World Commission on Environment and Development (WECD) published 'Our Common Future', which is commonly referred to as the Brundtland Report. The report defined sustainable development as: 'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'. In addition, a number of policy statements were agreed to progress sustainable development. These included The Climate Convention, The Biodiversity Convention and Agenda 21.
- 2.12 The World Summit on Sustainable Development in Johannesburg 2002 put sustainable development at the centre of the international agenda. World governments, major groups, civil societies and other stakeholders committed themselves to achieving the goal of sustainable development. The conference reaffirmed sustainable development as a central element of the international agenda and gave new impetus to global action to reduce human impact on the earth.

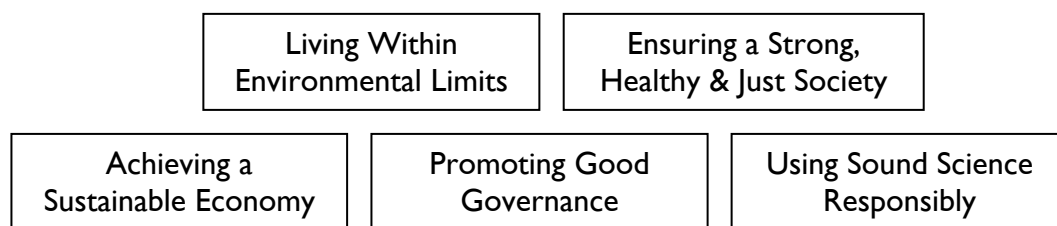
2.2 National

- 2.21 In March 2005 the government at the time published 'Securing the Future', delivering the UK sustainable development strategy. The Strategy takes account of developments since the 1999 Strategy, both domestically and internationally; placing greater emphasis on delivery at regional level and the new relationship between government and local authorities. It also takes account of new policies since 1999, and it highlights the renewed international push for sustainable development from the World Summit on Sustainable Development in Johannesburg in 2002.
- 2.22 A new purpose was established and five guiding principles for sustainable development. The following 'purpose', was agreed by the UK Government and was adopted as the new framework goal for sustainable development.

"The goal of sustainable development is to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. For the UK Government, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment; and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible. Government must promote a clear understanding of, and commitment to, sustainable development so that all people can contribute to the overall goal through their individual decisions. Similar objectives will inform all our international endeavours, with the UK actively promoting multilateral and sustainable solutions to today's most pressing environmental, economic and social problems. There is a clear obligation on more prosperous nations both to put their own house in order, and to support other countries in the transition towards a more equitable and sustainable world. (Securing the Future, 2005)"

- 2.23 The following are the set of shared UK principles, agreed by the UK Government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration that will be used to help achieve sustainable development. These

principles bring together and build on previously existing UK principles to set out an overarching approach, which the four previous strategies can share.



All five principles form the basis for policy in the UK, with the goals of living within environmental limits and ensuring a strong, healthy and just society to be achieved by a means of a sustainable economy, good governance and sound science.

- 2.24 The current coalition Government reaffirmed its commitment to sustainable development by publishing its vision for sustainable development in 2011 which is to “stimulate economic growth and tackle the deficit, maximise wellbeing and protect our environment, without negatively impacting on the ability of future generations to do the same.” This refreshed vision and commitments build on the principles that underpinned the UK’s 2005 sustainable development strategy.
- 2.25 In March 2012 the coalition Government published the National Planning Policy Framework which sets out the planning policies for England and how these are expected to be applied. The NPPF states that the purpose of planning is to achieve sustainable development, described as development which contributes to building a strong and competitive economy, supports strong, vibrant and healthy communities, and contributes to protecting and enhancing our natural, built and historic environment. All Local Plans must be in conformity with the NPPF.

2.3 Local

- 2.31 The aim of the Sustainable Community Strategy is for Brighton & Hove to be a ‘city of opportunities’, where opportunities are provided for our residents to improve their lives, for our children to excel and a place for business to thrive. It is a place that provides these opportunities in a sustainable and inclusive way that reduces inequality and protects the environment. There are eight priority areas:
- Promoting enterprising and learning
 - Reducing crime and improving safety
 - Improving health and well being
 - Strengthening communities and involving people
 - Improving housing and affordability
 - Living within environmental limits and enhancing the environment
 - Promoting sustainable transport
 - Promoting quality advice and information services
- 2.32 The council is also currently developing a “One Planet Framework” which covers citywide work on One Planet activities that supports the council’s aspirations to become more sustainable. The One Planet approach uses ten principles and is the preferred model for sustainability for Brighton & Hove City Council.
- **Zero carbon** - Making buildings more energy efficient and delivering all energy with renewable technologies.

- **Zero waste** - Reducing waste arisings, reusing where possible, and ultimately sending zero waste to landfill.
- **Sustainable transport** - Encouraging low carbon modes of transport to reduce emissions, reducing the need to travel.
- **Sustainable materials** - Using sustainable products that have a low embodied energy.
- **Local and sustainable food** - Choosing low impact, local, seasonal and organic diets and reducing food waste.
- **Sustainable water** - Using water more efficiently in buildings and in the products we buy; tackling local flooding and water course pollution.
- **Land use and wildlife** - Protecting and expanding old habitats and creating new space for wildlife
- **Culture and community** - Reviving local identity and wisdom; support for, and participation in, the arts.
- **Equity and local economy** - Inclusive, empowering workplaces with equitable pay; support for local communities and fair trade.
- **Health and happiness** - Encouraging active, sociable, meaningful lives to promote good health and well being.

2.33 Brighton & Hove City Council is committed to working under these principles and is developing a programme to deliver the One Planet approach.

Section 3 Methodology

3.1 SA/SEA Guidance

3.11 This SA Report has been prepared by officers from the council's Planning Strategy and Projects Team. The SA process is underpinned by the requirements of the EU Strategic Environmental Assessment Directive and the approach adopted for this Sustainability Appraisal Report follows guidance produced by the Planning Advisory Service in the on-line Plan Making Manual and Sustainability Appraisal pages, and the Government's 'Practical Guide to the Strategic Environmental Assessment Directive' 2005. Guidance set out in the Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (2005) has also been applied as although now superseded, provides a good basis and a well understood methodology for carrying out Sustainability Appraisal.

3.2 Stages of SA/SEA

3.21 The Sustainability Appraisal process has five main stages (A-E), the requirements of which are described below. The stages of SA mirror and stages undertaken with regards to preparation of the City Plan. The requirements of the SEA Directive that are associated with the SA stages are also described as well as how the requirements have been met. Table 3 summarises the requirements.

3.3 Stage A - Setting the context and objectives, establishing the baseline and deciding on the scope

3.31 A1 - Plans, Programmes & Guidance

3.311 The SEA Directive Annex 1 (a) and (e) states the following should be included in the report:

- *“an outline of the contents, main objectives of the plan and programme and relationship with other relevant plans and programmes”;* and
- *“the environmental protection objectives, established at international community or member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”*

3.312 A number of plans and policies were identified that were of relevance during the initial scoping stage. This list was reviewed and updated at each stage of the development of Core Strategy and was reviewed again for the draft City Plan Part 1.

3.313 This stage of evidence gathering helped to identify targets and objectives which may affect or be affected by the City Plan, and helped in establishing key sustainability messages for the Plan area.

3.314 From this review, a number of key issues were identified, which were taken into account when developing the Plan and when developing the Sustainability Appraisal Framework.

3.315 The list of documents can be found in Appendix A and the more detailed analysis of each document is available on the councils website in the document entitled “Sustainability Appraisal Annex 1 - Review of Plans, Programmes and Strategies”.

It should be noted that the list of Plans Policies and Strategies is unlikely to be exhaustive as documents are reviewed, updated and replaced regularly.

3.32 A2 - Baseline Data

3.321 The SEA Directive Annex 1 (b) and (c) states the following should be included in the report:

- *“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”*; and
- *“the environmental characteristics of areas likely to be significantly affected”*.

3.322 A considerable amount of data that shows the current state of the city was collected by reviewing a range of documents and data sources or through the commissioning of studies. This list of data has been reviewed and updated at various stages during the development of the Core Strategy as well as for the development of the City Plan Part 1 and can be found in Appendix B.

3.323 Mapped data identifying citywide statistics, issues and constraints has also been produced and can be found on the council website.

3.324 From this review, key sustainability issues and challenges facing the area were identified, which were taken into account when developing the SA objectives. The baseline also provides the basis for predicting and evaluating the plans options and policy effects.

3.325 In addition, analysis of the baseline information allows trends to be identified. These can give an indication of the possible future state of the city without implementation of the Plan, although is fairly uncertain as this is dependant on many factors, many of which are not influenced by the City Plan. A summary of the future predicted baseline can be found in Section 4.

3.33 A3 - Identification of Sustainability Issues, Objectives and Indicators

3.331 The SEA Directive Annex 1 (d) states the following should be included in the report:

- *“any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of a particular environmental importance, such as those designated in pursuant to Directives 79/409/EEC and 92/43/EEC.*

3.332 Through the examination of the plans and policies, together with the findings of the baseline data, the different sustainability issues, including environmental, economic and social issues, of Brighton & Hove were identified. A summary can be found in Section 4 - Sustainability Issues of Brighton & Hove. Limitations to data collection can also be found in this section.

3.34 A4 – Development of Sustainability Appraisal Framework

3.341 From the issues that were identified, and the plans reviewed, a number of sustainability objectives were identified that formed the Sustainability Appraisal Framework. This was used to assess the potential impacts of objectives, options and policies presented.

3.342 Indicators to measure the impact were devised by council officers as well as through the expertise of a number of organisations during a number of consultation periods on various planning policies. The majority of indicators have been drawn from those already being used to monitor progress and are the subject of constant review, particularly as monitoring obligations for local councils change.

3.343 The Sustainability Appraisal Framework can be found in Section 5.

3.35 A5 - Consultation on the Scoping Report

3.351 The SEA Directive Article 5.4 states:

- *“The authorities referred to in Article 6(3) shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report”*

3.352 The plans, programmes, strategies and guidance, baseline information, sustainability issues, sustainability objectives and the proposed sustainability appraisal framework were set out in a Scoping Report which was circulated for public consultation in 2005. Statutory consultees at that time included English Nature, Countryside Agency, English Heritage and the Environment Agency.

3.4 Stage B - Developing and refining the options and testing the effects

3.41 B1 – Testing the DPD Objectives

3.411 The 23 Strategic Objectives of the City Plan were tested against the Sustainability Appraisal Framework and published in the Sustainability Appraisal Report (May 2012). This was to identify any areas of potential conflict and to ensure the Plan is meeting the aims of sustainable development.

3.42 B2, B3 & B4 – Developing the options; and predicting and evaluating the effects

3.421 In this version of the SA, Stage B2 – developing and assessing the options has been carried out for the policy on the Presumption in Favour of Sustainable Development. See Appendix D. This SA does not assess options for other policies as this has been carried out previously, notably at Preferred Options (2006), Revised Preferred Options (2008) and Policy Options Papers (2011) stages.

3.422 In this version of the SA, Stages B3 and B4 have been carried out on policies which are considered to have changed significantly since the draft City Plan Part 1 (May 2012) was published for consultation. The results of these appraisals can be found in Appendix D and in Section 7.

3.423 Policies which have not changed significantly since draft City Plan Part 1 (May 2012) have not undergone further assessment under stages B3 and B4. A scoping exercise on all policies took place to determine whether the policies had changed significantly enough to require further sustainability appraisal, the results of which can be found in Appendix C. The most recent assessments of these policies can be found the Sustainability Appraisal of the draft City Plan Part 1 (May 2012).

3.424 The SEA Directive Annex 1 (f) states the following should be included in the report:

- *“the likely significant effects on the environment , including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationship between the above factors”*

3.425 The Sustainability Appraisal Framework was used to assess policies and options that required re-appraisal. The general method used to assess each policy is as follows:

Strong positive impact:	++
Positive impact:	+
No impact:	0
Negative impact:	-
Strong negative impacts:	--
Impact uncertain:	?
Mixed impacts:	-/+

3.426 The score of positive uncertain (+?) or negative uncertain (-?) has also been applied where it is likely that the impact will be negative or positive but is uncertain and will require more research or depend on how the policy is implemented.

3.427 The SEA Directive Annex 1 (f) footnote (1) describes possible effects as *“secondary, cumulative, synergistic, short, medium, long term, permanent, temporary and positive and negative”*.

3.428 The commentary of the appraisals outline the likely effect, where known, and indicate whether the effect is likely to be positive or negative. In the majority of cases it is difficult to predict the permanence of effects. The assessments outline the predicted effects according to timeframe, as well as whether the impact is likely to be direct or indirect. Section 9 sets out the anticipated cumulative impacts.

3.429 The appraisals for policies which have not changed significantly since the draft City Plan Part 1 (May 2012) was published can be found online in the Sustainability Appraisal Report (May 2012).

3.43 B5 - Mitigation and Limitations

3.431 The SEA Directive Annex 1 (g) and (h) state the following should be included in the report:

- *“the measures envisaged to prevent, reduce and as fully possible offset any significant adverse effects on the environment of implementing the plan or programme”*; and
- *“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information”*

3.432 A summary of the main findings for each appraisal carried out at this stage, as well as any relevant mitigation, recommendations and any limitations can be found in the full appraisals appendix and in the summary of appraisals in Section 7 and Appendix D. A table outlining all the recommended changes to options and policies can be found in Section 8.

- 3.433 Mitigation relating to policies which have not changed significantly since the draft City Plan Part 1 (May 2012) can be found in the Sustainability Appraisal (May 2012) which is available online.
- 3.434 Reasons for selecting alternative options that have been considered at different stages of the City Plan's development have been documented in the associated Sustainability Appraisal reports (e.g. Preferred Options, Revised Preferred Options and Policy Options Papers stages) which are available online and also in Appendix G Assessment of Reasonable Alternatives.

3.44 B6 - Monitoring

- 3.441 The SEA Directive Annex 1 (i) states the environment report should include the following:
- *“a description of the measures envisaged concerning monitoring in accordance with Article 10”*
- 3.442 Detailed recommendations for monitoring relative to each individual policy were set out in Section 12 of the Sustainability Appraisal May 2012 which can be found online.
- 3.443 No further recommendations for monitoring the impacts of implementation of the policies have been included in this Sustainability Appraisal report as no additional significant adverse impacts were identified.
- 3.444 Section 10 outlines the monitoring indicators relating to the Sustainability Appraisal Objectives.

3.5 Stages C and D Production of and Consultation on the SA Report

- 3.51 The SEA Directive Article 6.1 states:
- *“the draft plan or programme and the environmental report prepared in accordance with Article 5 shall be made available to the authorities referred to paragraph 3 of this Article and the public”.*
- 3.52 The SA Report, containing the requirements as set out in Annex 1 of the SEA Directive and meeting the requirements of the Sustainability Appraisal Guidance has now been produced and is subject to a period of consultation and will be made publicly available.
- 3.53 Information on previous SA reports produced and stages of consultation can be found in Section 6.

Table 3 Meeting Strategic Environmental Assessment Requirements

Nb. Unless otherwise stated, all sections described in the second column are found within this SA Report.

SEA Requirement	Where the requirement has been met
(a) an outline of the contents, main objectives of the plan and programme and relationship with other relevant plans and programmes	Section 1 – sets out the background to the plan. Section 4 – sets out the relevant sustainability issues, including those evidenced from other plans and programmes. Appendix A provides list of plans, programmes and strategies reviewed, with full review as separate document.
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4 – identifies current state of environment and sustainability issues. Section 6 and Appendix G – sets out how assessment of options included a Business as Usual approach. Appendix B – states the current state of the environment. Earlier stages of SA, notably Preferred Options and Revised Preferred Options gave greater detail on Business as Usual approach.
© the environmental characteristics of areas likely to be significantly affected.	Section 4 - identifies current state of environment and sustainability issues, supported by Appendix B. Section 5 – SA objectives identify the need to protect environmental assets.
(d) any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of a particular environmental importance, such as those designated in pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 4 - identifies current state of environment and sustainability issues, supported by Appendix B. Section 5 – SA objectives identify the need to protect environmental assets. Screening for Habitats Regulations Assessment undertaken separately and reported in Appropriate Assessment May 2012.
(e) the environmental protection objectives, established at international community or member state level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 2 – relates to the need to implement sustainable development. Appendix A - provides list of plans, programmes and strategies reviewed, with full review as separate document. Section 3 – outlines how these plans have been taken into account. Section 4 – outlines how these have been taken into account.
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationship between the above factors. Footnote (1) describes possible effects as “secondary, cumulative, synergistic, short, medium, long term, permanent, temporary	Section 5 – sets out the objectives that cover all of the environmental issues listed. Section 7 and Appendix D– shows the assessments identifying possible effects. Section 9 – shows the assessment of Cumulative Impacts. Earlier SA reports show assessments of emerging and draft policies and options and highlights the potential impacts.

and positive and negative”.	
(g) the measures envisaged to prevent, reduce and as fully possible offset any significant adverse effects on the environment of implementing the plan or programme	The process of mitigation is incorporated into the SA of the City Plan during its various iterations. Details for some policies are shown in Section 7.
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	Section 6 and Appendix G– sets out how assessment of options included a Business as Usual approach as well as alternative options throughout the plan making process. Earlier SA reports contain further detail on SA options and assessment, notably in Preferred Options, Revised Preferred Options and Policy Options Papers stages.
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10	Section 10 shows the monitoring proposals for the SA.
(j) A non-technical summary of the information provided under the above heading.	A non-technical summary has been prepared and is available separately.
Taking the environmental report and the results of consultations into account in decision making.	All iterations of the SA, including this version, have been subject to consultation as follows: Scoping Report 2005. Preferred Options 2006 Revised Preferred Options 2008 Proposed Amendments Papers 2009 Policy Options Papers 2011 Draft City Plan Part 1 May 2012

3.6 Integration of other assessments

Habitats Regulations Assessment

- 3.61 The Conservation (Natural Habitats & Conservation) Regulations (1994) require land use plans to be subject to Appropriate Assessment (AA) if there is potential for them to result in significant effects on a Natura 2000 site, which includes Special Areas of Conservation and Special Protection Areas.
- 3.62 It is the responsibility of the Local Planning Authority (LPA) to assess whether an AA is necessary and to carry out the AA in preparation of DPD or SPD. Brighton and Hove has one European site, Castle Hill, which is designated as a SAC (and a Special Site of Scientific Interest (SSSI)).
- 3.63 An Appropriate Assessment Screening exercise has been carried out at various stages during the development of the City Plan/Core Strategy. At the Core Strategy Revised Preferred Options (June 2008) it concluded:
- ‘All the possible impacts of the Brighton & Hove Core Strategy on European sites have been discounted at the screening stage of this AA and it is therefore concluded that no change to the Core Strategy is required.’

3.64 The Appropriate Assessment was again reviewed to take into consideration the changes to policies as put forward in the City Plan Part 1 (2012). The Appropriate Assessment screening exercise concludes:

“The Brighton & Hove City Plan Part 1 details areas with new housing and other development which could have an impact on European sites in the vicinity. However most of this new development will be focused on specific growth areas within the existing built-up area and although some development is proposed on land between the built up area and South Downs National Park, there will be no encroachment onto land within 2km of a European Site. Similarly the park and ride sites will be located on the strategic road corridors approaching the city and beyond the distance where localised air pollution or recreational impacts might effect a European Site. With the information available at this stage of City Plan Part 1 development, all the possible impacts of the Brighton & Hove City Plan Part 1 on European sites have been discounted at the screening stage of this AA. It is therefore concluded that no change to the City Plan Part 1 is required at this stage.”

3.65 Natural England were consulted on the screening exercise in 2012 and concurred with its conclusion.

Section 4 Sustainability Issues in Brighton & Hove

4.1 Introduction

- 4.11 The SEA Directive requires that information on the current state of the environment is provided in the Scoping Report which was produced in 2006. The following information provides an update to this information and to the information provided in previous iterations of this document.
- 4.12 The Sustainability Appraisal has assessed the impact of the City Plan Part 1 on the following topics: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, and landscape, as required by the SEA Directive. The appraisal has also addressed social and economic factors in order to comply with Sustainability Appraisal requirements.
- 4.13 The above topics are addressed within the following table, and are structured under the over-arching headings of Environmental, Social or Economic issues. Evidently some of the topics can cross over into more than one of the overarching issues, however have been listed under the issue upon which it is considered to have the greatest impact.

Table of current local environmental, social and economic issues

Environmental Issues		
Issue	Description	SEA/SA topic
Ecological Footprint	<p>The Ecological Footprint of the South East is the highest of any region in the UK, at an estimated 5.09 gha/per (global hectares per person), higher than the national average of 4.64 gha/person.²</p> <p>Brighton & Hove's Ecological Footprint is 5.14 gha/person, higher than the regional and national averages, however this has reduced from the 2004 footprint of 5.72 gha/person.³ The following sectors have the highest impacts locally: the food sector (25%), households including energy consumption (23%), manufactured durables and consumables (14%), and the transport sector (19%).</p> <p>The Sustainable Community Strategy (2010) aims to achieve a reduction (from the 2006 baseline) to 2.5gha per person by 2020. Consumption and resource use will need to reduce to achieve this target.</p> <p>How the Plan can address this? The Plan's main influence on this will be through ensuring high standards in sustainable building design are achieved, and through trying to encourage sustainable travel through location of development and provision of infrastructure.</p>	<p>Biodiversity Soil Water Air Climatic factors</p>
Climate Change	<p>Climate Change has been identified as one of the key challenges facing the UK. Impacts of climate change in the UK are likely to include: changes in annual/seasonal average temperatures, rising sea levels, and increased frequency of extreme conditions which may lead to more flooding, subsidence and droughts. These will have different effects on different regions and are likely to have an impact on the following: water resources, water quality, biodiversity, health, building and infrastructure, soils and the economy.⁴</p>	<p>Climatic factors Biodiversity Human Health Water Material Assets Fauna Flora</p>

² The Ecological Footprint of Brighton & Hove – Stockholm Environment Institute 2006 www.sei.se/reap

³ The Ecological Footprint of Brighton & Hove – Stockholm Environment Institute 2006 www.sei.se/reap

⁴ www.ukcip.org.uk

⁵ Brighton & Hove Sustainable Community Strategy 2006

⁶ www.newscientist.com

⁷ www.decc.gov.uk

⁸ <http://www.decc.gov.uk/assets/decc/11/stats/climate-change/6222-local-and-regional-co2-emissions-estimates-for-200.xls>

⁹ <http://www.decc.gov.uk/assets/decc/11/stats/climate-change/6222-local-and-regional-co2-emissions-estimates-for-200.xls>

¹⁰ <http://www.decc.gov.uk/assets/decc/11/stats/climate-change/6222-local-and-regional-co2-emissions-estimates-for-200.xls>

Environmental Issues

Issue	Description	SEA/SA topic
	<p>The UK Climate Impacts Programme (2009) predicts by the 2020s, South East England will have:</p> <ul style="list-style-type: none"> • Average temperature increases of 1-1.5° C • 5-15% less rainfall • 10% drier soils • An increase in extreme weather events, such as very hot days, drought, storm surges, heavy rainfall, and floods <p>Biodiversity and Climate Change Many important species across the UK are constrained to relatively small and isolated areas that are adjacent to unsuitable habitats. Any change in climate may result in species being unable to move to suitable habitats which could result in the extinction of various species. A 1% rise in temperature means the conditions favourable to many species shift northwards by up to 90 miles, however many plants and species will not be able to relocate.⁵ The draft Local Biodiversity Action Plan will review the effects on biodiversity from climate change.</p> <p>The cost of Climate Change The global cost of climate change has been estimated in the Stern Report 2006, with the cost of extreme weather alone expected to be 0.5 – 1% of the worlds GDP by about 2050. It will be necessary to build new housing that is adaptable to extreme weather conditions that incorporates highly sustainable building designs and construction methods. The Stern Report also indicates that early investment and intervention will reduce the financial cost of climate change in the future.</p> <p>Health and Climate Change Warmer winters may reduce winter mortality rates and fuel poverty, however an increase in overall temperatures may cause heat stress and result in higher death rates in the summer. The European heat wave in summer 2003 contributed to the death of 2000 people in the UK alone.⁶ Flooding and other extreme weather events can restrict accessibility to health services and warmer weather may encourage the spread of diseases</p> <p>Climate Change Targets: The Climate Change Act 2008 commits the UK Government to achieving reductions in Carbon Dioxide</p>	<p>Landscape Social Economic</p>

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	<p>emissions of 80% by 2050 based on a 1990 baseline ⁷. In 2011, the UK Government committed to halving carbon emissions by 2025, from a 1990 baseline. Locally, the Sustainable Community Strategy (2010) sets a target for a reduction in direct carbon emissions of 12% by 2012/13, and 42% by 2020. The One Planet approach sets various targets for the council and for the city relating to carbon emissions, with Zero Carbon being one of the main principles.</p> <p>Climate Change Strategy: The council adopted a Climate Change Strategy in 2011. This draws together existing commitments, for example the commitment under the Nottingham Declaration and the Sustainable Community Strategy, ensure the targets in various strategies are being met and aims to focus efforts on reducing the city's carbon dioxide emissions. The Climate Strategy updates the 2006 Climate Change Action Plan and covers the wider city, rather than just the council's own operations.</p> <p>Local sources of Carbon Dioxide: To successfully reduce greenhouse gas emissions from the city, it is necessary to understand how much is produced and where they are produced. Figures published by the Department for Energy and Climate Change show trends for domestic gas and electricity consumption per local authority area as well as emissions from industrial and commercial sources and transport. In Brighton & Hove, domestic consumption of energy is responsible for 42% of Brighton & Hove's CO2 emissions. 32% of our carbon emissions are from industry and commerce and 26% come from transport.⁸</p> <p>Figures for 2010 published by DECC show that Brighton & Hove emitted a total of 1,285 kilo-tonnes of carbon dioxide in 2010, equivalent to about 5.0 kilo-tonnes per capita.⁹ There had been year on year reduction in overall CO2 emissions between 2005, when emissions were 5.7kt/capita and 2009 when emissions were 4.8kt/capita however there was an increase in the last monitoring period. The 2010 South East England average is 6.1kilo-tonnes per capita.¹⁰ The Sustainable Community Strategy (2010) sets a target for a reduction in direct carbon emissions of 12% by 2012/13, and 42% by 2020. A 15.64% reduction has been achieved since 2005.</p> <p>It should be noted that these figures are based on actual emissions only, and do not account for the embedded energy within the products consumed, which would make the carbon emissions significantly higher. In addition, these figures are also based on ONS mid-year estimates in terms of population, and not on more recent and accurate census data.</p>	

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	<p>How the Plan can address climate change? The Plan will need to ensure high standards of sustainable building design are achieved, that renewable energy infrastructure is implemented wherever possible, encourage sustainable travel, and ensure vulnerable development is located in areas away from flood risk.</p>	
<p>Flood Risk</p>	<p>As a coastal city, tidal flooding is an issue and is a potential constraint to the location of new development. As a consequence of climate change, and under a medium emissions scenario, it is estimated that sea level will rise by 21.8cm (based on 1990 levels) in the London region by 2050, increasing the risk of tidal flooding and erosion.¹¹ However, other predictions suggest that 1.1 or 1.2 metres is now probable due to polar ice melting rates.¹²</p> <p>A Strategic Flood Risk Assessment (SFRA) was completed in 2012 to assess the nature and extent of flood risk in the city and builds upon the 2008 SFRA. The findings are as follows: Fluvial Flood Risk - There are no surface water courses in the city, therefore there is no risk of flooding from rivers. Tidal Flood Risk – The majority of the city is located in Flood zone 1 (low probability of flooding). The city shares approximately 14km of it’s boundary with the sea and certain areas along the coastal frontage are situated in Flood zone 2 (medium probability), flood zone 3a (high probability) and Flood zone 3b (functional floodplain). Much of the area at risk from tidal flooding is protected by flood defences. However there remains a residual risk that the defences could fail or be overtopped during a flood event. The SFRA outlines that there are two main areas of the city at greater risk of tidal flooding: Portslade, including the eastern arm of Shoreham Harbour and the Marina. In these areas, the SFRA states that the allocation of land uses should be made on a sequential risk basis and suitable mitigation measures incorporated to manage the affects of wave overtopping where this cannot be avoided. Wave over-topping – This is a significant risk along the south coast and is one of the principal mechanisms of flooding for the coastal frontage. Allowing for wave-overtopping increases the extent of flooding. In some instances, this can mean the defended 1 in 200 year outline with the effect of wave overtopping would be larger than Flood Zone 3a. Any future development proposal along the coastal</p>	<p>Water Human Health Climatic Factors Material Assets</p>

¹¹ [UK Climate Projections - Maps & key findings: Sea level rise](#)

¹² [Brighton & Hove Sustainable Community Strategy 2010](#)

¹³ [Brighton & Hove Strategic Flood Risk Assessment 2012](#)

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	<p>frontage should be required to thoroughly consider the effects of wave overtopping through detailed modelling.</p> <p>Effects of climate change on tidal flood risk - There are three areas along the Brighton and Hove coastline which suffer notable increases in flood extent as a consequence of climate change: Portslade/Shoreham Harbour, Brighton Beach at Palace Pier and Brighton Marina. The SFRA also states that the Standard of Protection provided by the existing sea defences may reduce over time as a consequence of climate change and sea level rise, and will depend on the amount of increase.</p> <p>Surface water flood risk - This occurs in Brighton and Hove, and is a particular concern in urbanized areas, where floods occur quickly in response to heavy rainfall events, having potential adverse impacts on the groundwater resource as well as impacting on communities. There are eight well defined flow routes within Brighton and Hove. The largest affected areas are along the A23 and A270 which form a 'y' shaped flow route in the centre of the city. There are significant areas in Hove, which are more susceptible to surface water flooding. The largest area of surface water ponding in Hove lies between the A270 to Kingsway.</p> <p>Groundwater flooding - This is a potential risk due to the high permeability of the underlying chalk South Downs. An assessment of groundwater flood risk in Brighton and Hove shows that the risk varies across Brighton and Hove. Only the east of the A23 within Brighton is shown to be less susceptible to groundwater flooding; however the majority of the area is in the low risk category (< 25%). There are three areas which are more susceptible to groundwater flooding, Whitehawk Hill, North of Ovingdean and South of Anne's Well Gardens.</p> <p>Ground water flooding, surface water flooding, flooding from sewers and flooding from run-off from agricultural land following periods of high rain fall have all occurred in the city within the last 10 years.¹³</p> <p>How can the Plan address flood risk? The Plan will need to ensure vulnerable development is located in areas away from flood risk.</p>	
Air Quality	Road vehicles are the greatest contributing factor to poor air quality in Brighton & Hove, with vehicles emitting a variety of pollutants including carbon monoxide, nitrogen oxides, volatile organic compounds and particulate matters. Generally vehicles are more polluting to the local environment if they are	Air Human Health Social

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	<p>heavier, older or run on diesel. However, the position and geometry of buildings relative to the carriageway are also significant, for example fewer vehicles will cause an air quality problem on St James Street (narrow) as compared to with Kingsway (wide).¹⁴</p> <p>The Local Authority has a duty to review and assess air quality under the Environment Act 1995, with the objective to determine whether national air quality standards have been exceeded.</p> <p>Nitrogen Dioxide The results of a Detailed Assessment in 2004 found three areas which did not meet the annual Air Quality Objective for Nitrogen Dioxide (NO₂) and as a result of this an Air Quality Management Area was declared that covered the Lewes Road, Grand Parade and Preston Circus/London Road areas in 2004.</p> <p>Following the declaration of the AQMA Brighton & Hove City Council published an Air Quality Action Plan 2006 (AQAP) which set out the measures and policies to be implemented in the city to improve local air quality. Brighton & Hove City Council incorporated the AQAP with the City's Second Local Transport Plan 2005/6 -2010/11. This was seen as a logical step given that the primary source of local man-made air pollution is from road traffic.</p> <p>A further Detailed Assessment carried out in 2007 found there to be 14 areas that did not meet the annual Air Quality Objective for Nitrogen Dioxide. As a result of this a revised Air Quality Management Area was declared in 2008. The AQMA 2008 covers a much more substantial area of the city; from the boundary with Adur District Council in the west, to Old Shoreham Road in the north, and to Arundel Road in the east, and includes the existing AQMA area. Again, the AQMA is in respect to the exceedance of the Nitrogen Dioxide (NO₂) annual Air Quality Objective (AQO).</p> <p>In 2010, two monitoring locations situated outside the existing AQMA were found to exceed the annual AQO; at Preston Drove/Preston Road and Rottingdean. These two locations have been subject to a Detailed Assessment, with the results anticipated.</p> <p>Monitoring results from long-term surveys showed that NO₂ levels in Brighton & Hove generally</p>	

¹⁴ [Air Quality Action Plan 2011](#)

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	<p>improved between 2003 and 2008. Monitoring results since then show limited improvements in NO2 levels and that concentrations of NO2 exceed the annual AQO at a number of roadside locations, mostly situated within the AQMA.</p> <p>In 2010, 55 out of 63 monitoring locations exceeded the AQO and would need between a 4% and 48% reduction in NO2 levels to meet the AQO. ¹⁵ In 2011 monitoring results showed slight improvements in most city centre roadside locations compared to 2010 levels, with a reduction to 47 out of 63 monitoring locations exceeding the AQO, however overall NO2 levels in city centre locations have shown little improvement in the last 10 years. ¹⁶ It is noted however that outside the city centre that there has been a long term improvement in NO2 levels. The long running continuous analysers at Brighton Pavilion and Hove Town Hall demonstrate improvement and year on year compliance with the limit value. The council is currently taking proactive step to relocate its continuous these to the worst-case localities for NO₂ in Brighton & Hove, to make better use of these assets.</p> <p>Particulate Matter Fine particles in the air in urban areas are produced mainly from the combustion of solid fuel. Ultrafine particulates can travel 100 km in the atmosphere. The measures PM₁₀ and PM_{2.5} refer to Particulate Matter of less than 10 and 2.5 micrometers in diameter respectively. At present monitoring results for PM_{2.5} is available for one urban background site located in Brighton at Preston Park (part of Defra's national network). The EU target value for PM_{2.5} annual mean is 25 µg/m³. The annual mean at Preston Park in 2011 was 12 µg/m³ although monitoring data shows short term spikes of higher values. ¹⁷</p> <p>A new monitoring location for analysis of PM₁₀ was established in 2010 adjacent to the A23 on Beaconsfield Road. The new location is at or in line with relevant public exposure (similar distance back from the road source) and is within the AQMA declared for NO₂. An eleven month mean was recorded from February to the end of December 2011 equal to 27.4 µg/m³. This compares to an annual average limit value of 40 µg/m³. ¹⁸</p>	

¹⁵ [Air Quality Action Plan 2011](#)
¹⁶ [Air Quality Brief 2012](#)
¹⁷ [Air Quality Brief 2012](#)
¹⁸ [Air Quality Brief 2012](#)
¹⁹ [Air Quality Action Plan 2011](#)

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	<p>Health There are serious health effects to people exposed to the current levels of air pollution at European roadside locations. COMEAP (United Kingdom Government Committee on the Medical Effects of Air Pollution) states that air pollution:</p> <ul style="list-style-type: none"> • Has short term and long term damaging effects on health • Can worsen the condition of those with heart disease or lung disease • Can aggravate asthma; and • In the longer term, can have additional effects on individuals including some influence on average life expectancy. <p>Recent research is suggesting that there is no ‘safe’ threshold for particulate matter (PM_{2.5}) and that Air Quality Objectives do not represent a threshold below which air pollutants have no adverse effect. COMEAP confirm there is evidence to show that some people with cardiopulmonary diseases can be adversely affected by day-to-day changes in the levels of air pollutants and that numbers of deaths and hospital admissions go up when air pollution levels are high, particularly for those with cardiovascular and lung disorders and especially amongst the elderly. COMEAP state that while it is not possible, at the moment, to say how premature these deaths are most people studying this field believe that is likely to be a matter of weeks and months rather than years.¹⁹</p> <p>How can the Plan address air quality? The Plan will need to encourage modal shift and sustainable travel, either through provision of infrastructure and location of development, and will need to consider the location of sensitive receptors at development stage.</p>	
Transport	<p>The way that people travel varies according to a number of factors, including age, health and financial situation. People need transport to access basic activities such as work, education, health and food, and is one of the factors that contribute to the wider quality of people’s lives. A lack of accessible transport has been proven to be linked with social exclusion.²⁰ A good local transport system is needed to meet</p>	<p>Air Human Health Social Economic</p>

²⁰ <http://webarchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/pgr/inclusion/se/social'exclusionandtheprovisi3262/>
²¹ [City Performance Plan Targets Cabinet Report January 2012](#)
²² <http://services.defra.gov.uk/wps/portal/noise>
²³ [Brighton & Hove LTP3 2011](#)

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Issue	Description	SEA/SA topic
	<p>the needs of all residents and a balance between competing modes of transport must be sought. However, as road traffic is responsible for producing 26% of the city’s carbon emissions and is also the main source of nitrogen oxides and particulate matters, sustainable transport and reducing the need to travel is imperative.</p> <p>In addition to contributing to climate change and poor air quality, high levels of road traffic also lead to congestion which can be detrimental in a number of different ways including causing delays to emergency service vehicles, bus services and goods deliveries, causing increased noise pollution and increased severance of communities. Congestion can also have a negative impact on the economy. Congestion can also lead to frustration and stress for motorists, who may seek to use alternative, but less suitable routes to reach their destinations. It can also act as a deterrent to people who would like to use more sustainable modes such as walking or cycling.</p> <p>High levels of road transport and congestion have a direct impact on road safety, with a growth in road traffic inevitably leading to an increase in the number of accidents in the city. 136 people per year for the 2010 period were either killed or seriously injured in road traffic accidents.²¹ The Sustainable Community Strategy (2010) plans to “overcome actual road safety”. Sustainable Transport is also one of the priorities under the One Planet approach.</p> <p>High levels of road traffic also have a direct impact on road-related noise, prolonged exposure to which can have a detrimental impact on health and quality of life. Brighton & Hove has been mapped for noise under the Environmental Noise Directive, results from which show that many major junctions and roads already have high levels of traffic noise.²² The Joint Strategic Needs Assessment 2012 summarises this mapping exercise and states that around 2,000 households are within an “important area” where</p>	

²⁴ [Brighton & Hove LTP3 2011](#)
²⁵ Census 2001
²⁶ Brighton & Hove Bus & Coach Company
²⁷ [Brighton & Hove LTP3 2011](#)
²⁸ [Brighton & Hove LTP3 2011](#)
²⁹ Census 2001
³⁰ Census 2001
³¹ Census 1991 and 2001
³² [Brighton & Hove LTP3 2011](#)

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	<p>monitoring and actions to minimise the effects of traffic noise pollution are required. A Noise Action Plan builds on the results of the mapping exercise which sets out how to address road, and other sources of noise.</p> <p>Travel by car Nationally the number of cars on our roads is growing, however car ownership in Brighton & Hove averages at 0.87 cars per household, which is lower than the regional average of 1.3 and the national average of 1.1. Analysis shows that around 27,000 commuter car trips in the city are less than 3 miles²³. The rate of traffic growth in the morning peak hour period has been decreasing over the past few years, however this is considered to be the effect of congestion, decriminalisation of parking and more informed choices of travel rather than demand²⁴. The Sustainable Community Strategy (2010) sets a target of achieving between 10-20% reduction in car use by 2026, details of which will be set in the Delivery Plan of the Local Transport Plan (LTP3).</p> <p>Census data (2001) indicates that 49.4% of the population of Brighton & Hove travel to work by car either as a driver or passenger, which although high is significantly lower than the national average of 65.9%.²⁵</p> <p>Travel by public transport Bus patronage has increased year on year from 30.2 million journeys in 2000/01 to 46.3 million in 2009/10.²⁶ There have been a number of improvements made to the bus network, including creating accessible bus stops and introducing Real Time Passenger Information at many of the most frequently used bus-stops. The current bus network radiates from a number of city centre ‘hubs’ at Churchill Square, Old Steine and Brighton Rail Station. Orbital links connect outer suburban areas of the city with the central area. There is little spare capacity at the key interchange locations and further expansion of services is somewhat constrained. In addition, bus congestion and capacity constraints exist on North Street and Western Road.²⁷ Bus fares have increased over recent years and some journeys including those which access the Downs, now require a more expensive ticket.</p> <p>There are eight stations that serve the rail network located within Brighton & Hove. Most, particularly</p>	

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	<p>Brighton Station, act as passenger interchanges for all forms of transport with facilities for taxis, buses, cycling and walking. The stations act as ‘gateways’ to the city and need to be of a good standard, connecting with the city centre, the seafront, other landmarks and transport routes. The combined, annual footfall at all 8 stations in the city is 19,250,000, of which 13,800,000 occurs at Brighton Station. In addition there are 1,930,000 interchanges per year, where passengers change trains without leaving the station. Brighton is the busiest station on the south coast between Kent and Hampshire.²⁸.</p> <p>Census data indicates that 21% of the population of Brighton & Hove travel to work by public transport, which is higher than the national average of 9.4%.²⁹</p> <p>Walking/Cycling</p> <p>Walking is a popular choice in the city and is therefore a high priority with numbers increasing in recent years to the extent that the proportion of residents walking to work is well above regional and national averages. Census data indicates that 17.2% of the local population travel to work on foot, compared to the regional average of 10%. However there are several areas within the city that are not pedestrian friendly and lack permeability.</p> <p>Cycle use for travel to work in the city is 2.7%, which is similar to the national average (2.8%) and slightly below the regional average (3.1%).³⁰ However, this figure represents a growth of 50% between 1991 and 2001.³¹ Monitoring carried out between 2006 and 2009 indicate that cycling in the city has increased by 27% over that time³². The city contains a number of cycle routes including National Cycle Routes 2 and 20, and Regional Cycle Routes 82 and 90, as well as a number of local routes, however the city does not have a full cycle network.</p> <p>A significant amount of investment in cycling infrastructure has occurred with additional investment through the Cycling Demonstration Town award, including improved routes, cycle parking and advance stop lines, training, sheltered parking in schools and events to promote cycling.</p> <p>Walking and cycling have clear links with improved health, and are also the most accessible forms of transport.</p>	

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Issue	Description	SEA/SA topic
	<p>Predicted transport growth Sustainable transport is essential to reduce CO2 emissions and improve air quality in Brighton & Hove, decrease congestion, improve road safety and increase accessibility. The Local Transport Plan is the main delivery vehicle for tackling these problems, however various DPDs and SPDs including the City Plan must also contribute towards tackling this issues. See also, noise.</p> <p>How can the Plan address transport issues? The Plan will need to encourage modal shift and sustainable travel, either through provision of infrastructure and location of development.</p>	
<p>Water Resources</p>	<p>Southern Water provides water to Brighton & Hove. Their assumption is that per capita water consumption will stabilise over the next few years and that due to decreasing demands (e.g. water metering) and improvements (e.g. leaks) that demand will not grow in line with households³³ & ³⁴. However there will be challenges for water resources over the next 25 years with Southern Water’s Management Plan 2010-2035 setting out some of the schemes and restrictions that may occur over the period of their management plan including sprinkler bans, hosepipe bans and drought orders.³⁵ Southern Water as the statutory water and sewerage undertaker has an obligation to serve new developments. Improvements to supplies for new developments are funded in part by the developer.</p> <p>Southern Water data indicates that winter rain is vital to refill reservoirs and increase river flows and groundwater recharging. The Environment Agency has classified the location as falling within an area of serious water stress, where demand for water is high and resource availability is low³⁶.</p> <p>Household water consumption was 150 litres per household per day in 2009/10, below the South East average level of consumption (of 156) but more than the UK average of 149.³⁷ Water consumption has</p>	<p>Water Material Assets</p>

³³ Brighton & Hove Infrastructure Capacity Study 2005-2026
³⁴ [Southern Water 2009 Final Water Resources Management Plan 2010-2035](#)
³⁵ [Southern Water 2009 Final Water Resources Management Plan 2010-2035](#)
³⁶ Areas of Water Stress: Final Classification (Environment Agency: 2007)
³⁷ [State of the Local Environment Report 2011](#)

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	<p>decreased over the last few years. In this context, promoting high standards of building design and changes in public behaviour and expectations is crucial. Progressive reduction of water use leading up to water neutrality³⁸ in developments is one of the key challenges for the region in general and Brighton & Hove in particular.</p> <p>Sustainable use of water is also one of the priorities under the One Planet approach.</p> <p>Water Quality</p> <p>The requirements of the Water Framework Directive mean that all bodies of water (including surface water, coastal waters and groundwater) will need to achieve “good” status by 2015 and the quality of all water resources needs to be protected. The WFD measures water quality on both chemical quality and ecological quality.</p> <p>Groundwater</p> <p>South East England is unique as approximately 70% of the water supplied for public consumption comes from groundwater. A significant proportion of the city overlies the Brighton Chalk Aquifer. This is an important groundwater resource supplying water for public consumption and supplies the needs of Brighton & Hove and the neighbouring towns on the south coast, however is heavily exploited. The Groundwater quality in the Brighton Chalk aquifer is at risk of deterioration from nitrates and pesticides, relating to rural as well as urban inputs³⁹. In addition, the aquifer is at risk of saline ingress from the sea and other rivers and therefore abstraction is carefully managed.⁴⁰ There is a policy of no further consumptive abstraction has been in place since the 1990’s, recognising that a large proportion of the recharge to the aquifer has been licensed for abstraction.⁴¹ In addition construction works of any kind have the potential to contaminate the aquifer, as does pollution associated with surface water runoff, and must be prevented. In addition, recharge of the aquifer may be adversely affected by urbanisation.⁴²</p>	

³⁸ Water neutrality defined as meaning “total water use after new development must be equal to or less than total water use in the area before the planned development (both domestic and non domestic.)”

³⁹ [River Basin Management Plan for the South East \(2009\)](#)

⁴⁰ [Adur & Ouse Catchment Abstraction Management Strategy \(Environment Agency 2005\)](#)

⁴¹ [Adur & Ouse Catchment Abstraction Management Strategy \(Environment Agency 2005\)](#)

⁴² [British Geological Society – the impact of urbanisation on groundwater](#)

⁴³ State of Groundwater Report – Brighton & Hove City Council (Environment Agency 2009)

⁴⁴ Environment Agency

⁴⁵ [State of the Local Environment Report 2011](#)

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	<p>The overall status of the Brighton Chalk Aquifer is poor.⁴³ The chemical status of the aquifer was found to be good, however as the quantitative status was found to be poor, the overall status is also found to be poor. Various measures will need to be taken to ensure the groundwater resource reaches good status, which will need to be achieved by 2015 to meet the requirements of the Water Framework Directive.</p> <p>Seawater The quality of our seawater is of equal importance in terms of environmental quality and its value as a recreational asset. In 2010, seawater quality in Brighton was measured as “good” (reduced in quality from excellent in 2009), in Hove was measured as “good”, (reduced in quality from “excellent” in 2009), and Kemp Town was measured as “good” (no change from 2007 analysis).⁴⁴ As of 2011, monitoring reflects requirements of the amended Bathing Waters Directive, with Brighton Central, Hove and Kemp Town all achieving “Higher” status. “Higher” means the bathing water meets the criteria for the stricter UK guideline standards of the Directive.</p> <p>Water treatment New development requires sewers and wastewater treatment. Southern Water has put in a proposal for a new wastewater treatment works (WTW) and trunk sewer. The Environment Agency provided information on Nitrate Concentration at the Surrenden Garden borehole, which showed that it is well below the nitrate concentration limit for drinking water (50 mg/l). However, 100 per cent of Brighton & Hove is in a nitrate vulnerable zone.⁴⁵</p> <p>How can the Plan address water quality and resources issues? The City Plan will need to ensure high standards of sustainable building design are achieved, relating to water consumption, and will need to consider drainage and ensure adequate provision for water treatment to protect water quality.</p>	
Waste	Waste management is still heavily reliant on disposal to land. Badly managed landfill can lead to air and water pollution or soil contamination and the decreasing landfill available creates a challenge for the future disposal of waste. There are also issues concerned with the transportation of waste to waste	Soil Air Climatic Factors

⁴⁶ [City Performance Plan Targets Cabinet Report January 2012](#)

⁴⁷ [Annual Monitoring Report 2010/11](#)

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Issue	Description	SEA/SA topic
	<p>management sites, placing a burden on our road transport system, as well as contributing towards climate change and poor air quality.</p> <p>In 2010/11 the amount of Municipal Solid waste collected per household was 605kg.⁴⁶ In 2010/11 23.4% of MSW was recycled, 3.4% was composted, 26% was used to recover heat or power and 1% was re-used for other purposes.⁴⁷ This left 46% to be otherwise disposed of and since the recent closure of the local landfill site, this waste is being transported further for disposal. Brighton & Hove City Council and East Sussex County Council are currently jointly working on producing the Waste and Minerals Development Framework for the provision of facilities and sites for management of all types of waste for the next 20 years.</p> <p>The European Landfill Directive requires us to reduce the amount of biodegradable waste going to landfill. This includes food and garden waste, as well as paper and cardboard. In the UK the biodegradable waste we landfill must be reduced to 35% of 1995 levels by the year 2020. It has been estimated that one tonne of biodegradable waste produces between 200 and 400m³ of landfill gas, which contains a high proportion of methane. It has been estimated that landfill sites released 25% of the UK's methane emissions in 2003, which represents about 2% of UK total greenhouse gas emissions⁴⁸.</p> <p>The amount of waste composted has steadily increased since 2000/01 and was 3.4% in 2010/11. However, this only accounts for garden waste collected at civic amenity sites and does not include garden or kitchen waste composted at home. The council continues to offer low-cost composters and wormeries for residents, however it is accepted that these may not be suitable for all types of housing, particularly flats on upper levels, where a different solution may be necessary.</p> <p>The Sustainable Community Strategy 2010 sets a target of recycling of 70% for domestic waste by 2025. However, in addition to increasing our recycling rates, the amount of waste produced also needs to be reduced. Zero waste is also one of the priorities under the One Planet approach.</p> <p>Municipal Solid Waste accounts for about 19% of the waste arising in the Brighton & Hove and East</p>	<p>Landscape</p>

⁴⁸ www.brighton-hove.gov.uk

⁴⁹ East Sussex and Brighton & Hove Waste & Minerals Core Strategy Preferred Strategy 2011

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	<p>Sussex area.⁴⁹ Other forms of waste include Commercial & Industrial Waste, which made up about 18% of waste in the area, Construction & Demolition Waste, which made up about 62% of waste produced in the area and other wastes including hazardous waste, liquid waste and wastes arising from the agricultural sector.</p> <p>How can the Plan address the need to reduce waste? The City Plan will need to ensure that adequate provision for waste and recycling is incorporated into new build, however will have little influence over behaviour relating to waste.</p>	
<p>Biodiversity, Fauna and Flora</p>	<p>The distribution and types of species found in an area is a good indicator of the state of the wider environment. Even in urban areas, where natural habitats are often highly modified and fragmented, the presence of a range of beneficial species can be a good indicator of environmental quality. National, regional and local policy requires all development in the city to protect and enhance local biodiversity, particularly if it is of national or international significance. A Supplementary Planning Document on Nature Conservation and Development has been adopted by the council to provide advice on how biodiversity can be incorporated into new development as well as how to protect existing biodiversity.</p> <p>The following are identified as issues for concern in the Sustainable Community Strategy 2010:</p> <ul style="list-style-type: none"> • There is no clear picture of how biodiversity is changing locally but available evidence points to a continuing loss of species and habitats; • People benefit from experiencing nature as a part of everyday life but increasingly urbanisation and sedentary lifestyles mean that many are becoming more isolated from it in practice. <p>Biodiversity Action Plans The UK Biodiversity Action Plan (1994) established clear objectives for the maintenance, connection and extension of key habitats and species found throughout the UK. Local Biodiversity Action Plans (BAP) include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest. Brighton & Hove City Council is a member of the Sussex Biodiversity Partnership which is responsible</p>	<p>Biodiversity Fauna Flora Human Health Landscape</p>

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Issue	Description	SEA/SA topic
	<p>for producing and overseeing the implementation of the Sussex BAP. The purpose of the Sussex BAP is to set out a clear programme to ensure biodiversity is sustained and enhanced in Sussex.⁵⁰ Several habitats and species of national and local importance are addressed, such as chalk grassland, hedgerows and flood plain grasslands, skylark, barn owl and brown hare. Sussex BAP targets of particular relevance locally include:</p> <ul style="list-style-type: none"> • Maintaining total extent of coastal vegetated shingle • Achieve favourable or recovering condition of 2104 hectares of lowland calcareous grassland by 2010 • Maintain the existing maritime cliff and slope resource <p>Brighton & Hove City Council is also producing a local BAP for Brighton & Hove, which was subject to consultation in 2011. The draft LBAP identifies all the species and habitats of particular importance to the city and sets out the action needed to ensure they are conserved for future generations. This includes action plans covering 18 species or groups of species which are considered to have specialist requirements which can be addressed locally and which cannot be adequately addressed through local habitat action plans. The LBAP also includes actions plans covering 14 habitats of greatest importance locally. Many of these habitats support species that are not covered by the aforementioned species actions plans. Examples of species and habitats that have action plans in the LBAP include the Adder, Hazel Dormouse, Sea Heath, and Short-snouted Seahorse; and Coastal Vegetated Shingle, Lowland calcareous grassland, Maritime cliffs and slopes, and Subtidal chalk.⁵¹</p> <p>Green Network</p> <p>A Green Network for Brighton & Hove will provide the spatial component of BAP habitat targets. A Green Network has been progressed as a partnership project between Sussex Wildlife Trust and the Council. The aim is to define and create a continuous green network of routes through the city, which can then be implemented through the Local Development Framework. The network includes the locations for the creation of new habitats (to meet BAP habitat creation targets) and help to mitigate the effects of Climate Change by reducing species isolation and facilitating the movement of species across the urban environment. The green network will also:</p>	

⁵⁰ www.biodiversitysussex.org

⁵¹ [draft Local Biodiversity Action Plan v.4 2011](#)

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Issue	Description	SEA/SA topic
	<ul style="list-style-type: none"> • provide new outdoor leisure and recreation facilities; • integrate a sustainable transport network; • aesthetically enhance the city, and • deliver ecosystem benefits such as reduced air pollutants and storm water run-off. <p>Biosphere Reserve UNESCO is developing a global network of Biosphere Reserves which aim to promote a balanced relationship between people and nature. There are 580 sites which are part of the Biosphere Reserve Network in 114 countries. The Brighton & Hove and Lewes Downs Biosphere Project is led by the City Sustainability Partnership and Brighton & Hove City Council, in partnership with other adjoining authorities, and aims to achieve international recognition from the United Nations for the special nature of the local environment. The vision is to develop a unified approach to better care for, manage and enjoy the local environment. The Biosphere Reserve will consist of three zones: the Core Zone, which must be an internationally recognised site such as a Special Area of Conservation; the Buffer Zone which surrounds and links to the Core Zone which will include areas of the SDNP and stretches of the coast and sea; and the Transition Area which is the wider area of co-operation where people live and work, which will include the wider urban area. It is hoped that the Biosphere Reserve will cover stretches of land located within Adur, Horsham, Mid Sussex and Lewes District Councils as well as within Brighton & Hove. The project will be publically launched in 2012 with the plan to submitting the application for Biosphere Status in 2013.⁵²</p> <p>Designated Sites Brighton and Hove has a wealth of designated wildlife sites which collectively account for approximately 16% of the total land area of the city.</p> <p>Castle Hill (just outside Woodingdean) is of European and UK importance, having been designated a Special Area of Conservation (SAC) under the EC 'Habitats' Directive and a National Nature Reserve</p>	

⁵² [Urban Biosphere Project](#)
⁵³ www.naturalengland.org.uk

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Issue	Description	SEA/SA topic
	<p>and Site of Special Scientific Interest (SSSI) under the UK National Parks and Access to the Countryside Act 1949. The city's other nationally important site is Brighton to Newhaven Cliffs SSSI. According to the latest survey (2007), Brighton to Newhaven Cliffs is in 100% favourable condition, an improvement on 2005 when 89% of the SSSI was in favourable condition. Castle Hill SSSI was last surveyed in 2009 when it was 100% in favourable condition which is an improvement from 2003 when it was surveyed as unfavourable⁵³.</p> <p>Brighton & Hove City Council has declared a number of Local Nature Reserves. These are statutory wildlife sites designated under the National Parks and Access to the Countryside Act 1949. They are also protected under policy NC3 of the Local Plan. There are eight designated and proposed Local Nature Reserves in the city, these being Bevendean Down, Beacon Hill, Benfield Hill, Ladies Mile, Stanmer Park, Whitehawk Hill, Wild Park and Withdean Woods.</p> <p>The Council has also designated 62 Sites for Nature Conservation Importance (SNCIs). These are non-statutory policy designations protected by policy NC4 of the Local Plan 2005. The network of SNCIs includes Black Rock and Volks Railway, which both have vegetated shingle species such as Sea Kale and Yellow-horned Poppy. Other SNCIs have species-rich chalk grassland with a range of orchids and other specialist plants and wildlife. Vegetated shingle and species-rich chalk grassland are nationally rare habitats listed in Annex 1 of the EC Habitats Directives as habitats of international conservation importance. The SNCIs were designated in 1998 and the city council is currently reviewing them.</p> <p>Land Use and Wildlife is also one of the priorities of the One Planet approach.</p> <p>How can the Plan address the need to protect biodiversity? The City Plan will need to ensure that development is located away from sensitive and important wildlife/nature conservation sites where possible, ensure that green infrastructure and links to it, is provided and promoted and ensure that loss of biodiversity does not occur.</p>	
Landscape	Brighton and Hove is a compact city of 8,267 hectares built on rolling hills and valleys and situated between the South Downs and the sea. The majority of the resident population live in the built up area	Landscape Biodiversity

Environmental Issues

Issue	Description	SEA/SA topic
	<p>that comprises roughly half this area. The order to confirm the designation of the South Downs National Park was confirmed in 2009 and came into effect in 2010. The SDNP is recognised as a nationally important area with outstanding natural beauty and rich cultural heritage. National Park designation confers the highest status of protection as far as landscape and scenic beauty are concerned. Approximately 40% of the total administrative area of Brighton & Hove falls within the National Park including Tenant Hill, Saltdean, the cliffs east of the Marina, Stanmer Park, Falmer Hill, Wild Park, Hollingbury Hill, Coney Hill, Foredown Ridge, the area stretching east from the eastern side of Sheepcote Valley and south from Woodingdean to include Red Hill and Mount Pleasant along with Roedean School and St Dunstons right down to the coast.</p> <p>The elevated nature of the Downs provides extensive views over areas beyond the defined National Park boundary. Care therefore needs to be taken to ensure that development outside the designated boundary does not adversely affect the character of the National Park.</p> <p>The recent confirmation order may increase on the number of people wishing to access the Downs from the city. Sustainable access to the Downs will be imperative in order not to degrade the nature of the Downs through congested roads. There are many ways that the SDNP can be accessed from the city, including by bus and rail, as well as via bike, with the National Cycle Network routes in the city all leading out of the city towards and into different parts of the SDNP, and on foot with many public rights of way leading from the city into the SDNP.</p> <p>The main geological interest on Brighton & Hove's coastline is the chalk cliff line to the east of Black Rock. The cliffs are designated a Site of Special Scientific Interest (SSSI), a Regionally Important Geological Site (RIGs) and a Geological Conservation Review site (GCR). There are also two other RIGs in Brighton & Hove: Stanmer Village and Park and the Goldstone – Hove Park.⁵⁴</p> <p>How can the Plan address the need to protect the surrounding landscape?</p> <p>The City Plan will need to ensure that the views of and from the South Downs National Park are not adversely effected by development, located along its boundary of further away, and should promote sustainable links and visitation to the SDNP.</p>	<p>Human Health Flora Fauna Soil</p>
<p>Open space</p>	<p>Green open spaces provide a variety of benefits. They can help to improve our health, by contributing to</p>	<p>Landscape</p>

⁵⁴ www.citywildlife.org.uk

Environmental Issues

Issue	Description	SEA/SA topic
<p>and recreation</p>	<p>our physical, mental, and emotional well-being, with results from studies undertaken as part of Natural England’s “Our Natural Health Service” campaign showing a link between distance to green space, physical activity and likelihood of obesity. A number of “healthwalks” are currently delivered in a variety of open spaces throughout the city helping to promote the link between health and open space through walking ⁵⁵.</p> <p>Open spaces can also offer lasting economic, social, cultural and environmental benefits. They act as heat sinks and help to cool urban environments, thus reducing the “urban heat island effect”, the difference in temperature between urban areas and the surrounding countryside, which can be as great as 5°C ⁵⁶. Parks, recreation grounds, play areas, cemeteries and allotments are part of this rich matrix of open spaces, in addition to the beach.</p> <p>The Open Space, Sports and Recreation Study 2008/09, was undertaken to establish a baseline of existing provision and set open space standards for quantity, quality and accessibility. The study has helped to demonstrate whether there are deficiencies or over-supply. The study found there was an existing shortfall (measured against 2006 population levels) in the children and young people typology. It does not identify any surplus open space and demonstrates that the city will need to retain and effectively use all existing (both public and private) open space and create more areas of open space by 2026 in order to meet the predicted increase in population.</p> <p>The study also assessed provision of indoor sports facilities. The survey found that some additional indoor facilities would be needed, including swimming pools, sports hall space, and health & fitness stations. It was also noted that there was no ice rink within the area, with the nearest being 35 miles away. In 2008, an audit of sports facilities in the city was undertaken, which found that out of 140 football pitches, only 7 were suitable for under 11’s and 31 were suitable for junior football. The report recommended increasing access to sports facilities for under 11’s although it is also understood that in practice there does not appear to be a demand for junior-sized football pitches that cannot be met. An Indoor Sports Facilities Plan is currently being developed which will bring together these findings, including looking at provision for young people, and this will inform the City Plan. ⁵⁷</p>	<p>Human Health Material Assets Social</p>

⁵⁵ www.brighton-hove.gov.uk/healthwalks

⁵⁶ www.livingroofs.org

⁵⁷ BHCC Sports Facilities Team

⁵⁸ <http://www.naturalengland.org.uk/press/releases2008/100308.htm>

⁵⁹ An Analysis of Accessible Natural Greenspace in the South East (2007), Forestry Commission & High Weald AONB unit.

Environmental Issues

Issue	Description	SEA/SA topic
	<p>With the sporting facilities such as the Brighton Race Course and Sussex Cricket Ground Brighton & Hove contains sporting facilities of regional and sub-regional importance. As well as providing fun, exercise and a sense of achievement, participation in sport and active recreation helps to create sustainable communities, good health and well being, social inclusion and promote good educational attainment.</p> <p>In 2010 an update to the Open Space Study was carried out to revisit the standards set for open space, to assess all areas of open space at local level (e.g. sub-ward level) against the population levels predicted for 2030 and to develop a scoring system to assess the areas of open space. The study endorses the citywide standards set for open space. In addition, the findings of the study from applying the open space standards at local level show a significant variation in the supply of open space found across wards. In general, the majority of wards fell below the standards in at least one of the 6 categories, e.g. meaning that existing open spaces needs are not met. The two exceptions were East Brighton and Hollingbury & Stanmer. The findings also indicate that in all categories the standard will fall between 2007 and 2030 reflecting the projected increase in population during the period. The study also recommended that innovative ways will need to be found to enable people living in areas of deficiency to access spaces in areas of sufficient supply.</p> <p>When applying the open space standards using ONS population projections (updated to incorporate findings of the Census 2011) a significant increase of around 252 hectares of open space would need to be created by 2030 to meet the needs of the future predicted population, or an increase of 208 hectares when taking account the City Plan housing target. In addition, an increase of between 20-24 hectares of outdoor sports space will be required.</p> <p>Food growing</p> <p>The Open Space Sports and Recreation Study found that was no overall shortfall (measured against 2006 population levels) in allotment sites, however the study update indicates that there are areas in the city which are currently under-provided. There are large waiting lists for allotments in some locations in the city. The council recognises the increasing interest in growing food in the city, and is currently working to identify more sites for food growing in the city. A number of initiatives are in place to increase access, including smaller sized Learner Plots for new allotment holders, and Double Plots, whereby plots</p>	

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Issue	Description	SEA/SA topic
	<p>are shared between two holders.</p> <p>Access to Natural Greenspace Natural England’s Accessible Natural Greenspace Standard (ANGst) states that every home should be within 300 metres of an accessible natural green space of at least two hectares (ha) which is equivalent in size to two football pitches.⁵⁸ Each home should also have access to:</p> <ul style="list-style-type: none"> • at least one accessible 2ha site within 300m • at least one accessible 20ha site within 2km • at least one accessible 100ha site within 5 km • at least one accessible 500ha site within 10km <p>Natural England broadly defines natural green space as:</p> <ul style="list-style-type: none"> • accessible nature conservation areas e.g. Local Nature Reserves, National Nature Reserves, Sites of Special Scientific Interest (SSSIs). • formal and informal parks, country parks, canals and rivers, unimproved farmland and other linear greenspace (e.g. coastal strips). <p>In 2007, a study showed that in Brighton & Hove 21% of households live within 300m of a 2ha+ site; 68% live within 2km of a 20ha+ site and 99% live within 10 km of a 100ha+ site.⁵⁹</p> <p>However, it should be noted that the Open Space, Sport and Recreation Study details the quantity of open space in the city, including natural and semi-natural space. It recommends local open space standards that are considered appropriate to Brighton & Hove, as the constraints of the city which is bounded by the sea to the south and the National Park to the north, limit its ability to fully accord with the ANGst standards.</p> <p>See also, Green Network.</p> <p>How can the Plan address the need for open space?</p> <p>The City Plan will need to ensure existing areas of all types of open space are protected, that under-used areas of open space are improved, and that new areas of various types of open space are created in order to meet the needs of future levels of population.</p>	

Environmental Issues

Issue	Description	SEA/SA topic
<p>Cultural Heritage</p>	<p>The city has an extremely attractive historic urban environment. There are around 3,400 listed buildings of which around 14% are either Grade I or II*. There are 15 scheduled ancient monuments, six registered parks or gardens of special historic interest and 34 conservation areas⁶⁰. Six of the city's Conservation Areas are classified as being at risk. This equates to almost 17% (or 1 in 6 locally), compared to 6% nationally.⁶¹ Nine of the city's Grade I or II* buildings are classified as being at risk.⁶² The historic built environment of Brighton and Hove, particularly its rich Regency and Victorian legacy, is recognised as being of regional importance; this historic environment is acknowledged as a tremendous asset, part of the regional and local character and sense of place, acting as a 'draw' for those investing in the area. Historic buildings are also an important cultural asset, contributing to positive visitor experience and tourism revenue, which is important to the local economy. They further provide an archaeological and educational resource for the future. The council will protect and enhance this through the conservation of its special areas and by encouraging excellence in architectural design and has produced an Architectural Features SPD to ensure that the city's historic features are protected. The draft Design Guide for Extensions and Alterations SPD will also seek to protect the historic built environment.</p> <p>How can the City Plan protect our historic built environment? The City Plan will need to ensure new development does not harm the setting of, building or area of interest.</p>	<p>Cultural heritage, Material assets</p>
<p>Contaminated Land</p>	<p>Since 1st April 2000, Brighton & Hove City Council has been under a statutory duty to produce a strategy to deal with 'contaminated land' in its area and to ensure that any contaminated land which is identified, is then remediated. The city council already holds information on some areas of land that has contaminants due to submissions under the development control process and has also undertaken a study of historical uses to ascertain whether areas of land have potential for contamination due to a previous or existing use. There are currently 2863 sites that have been identified as contaminated or have potential for contamination in Brighton & Hove.⁶³</p>	<p>Soil Human Health Water Landscape</p>

⁶⁰ Brighton & Hove Heritage team
⁶¹ [Conservation Areas at Risk, English Heritage 2011](#)
⁶² English Heritage, Heritage at Risk register 2012
⁶³ Brighton & Hove Environmental Health team

Environmental Issues

Issue	Description	SEA/SA topic
	How can the City Plan remediate contaminated land? The City Plan has little direct influence over this, however can promote and identify sites for development that may have potential for contamination.	

Social Issues		
Issue	Description	SEA / SA topic
Demographics	<p>Brighton & Hove has a resident population of 273,400⁶⁴ This has increased by more than 10% since the 2011 Census, which is higher than predicted. According to the Census 2011, most age bands differ from the national average.</p> <p>Age bands which are significantly higher than the national average include 20-24, 25-29, 30-34, 35-39, and 40-44, which total 42.7% of the local population compared to 32.7% in these age bands nationally.</p> <p>Age bands which are significantly lower than the national average include 0-4, 5-9 and 10-14, which total 15.3% of the local population compared to 17.7% in these age bands nationally. In addition, the population within age range 50 to 84 totals 25.7% of the local population compared with 32.2% in these age bands nationally.</p> <p>Age bands where there has been a particular increase since the 2001 Census include age bands 0-4, 15-19, 20-24, 40-44, 45-49 and 60-64. Age bands which have seen a particular decrease in population include 30-34, 70-74 and 75-79.</p> <p>In 2011/12 7.7% of the economically active population were unemployed, which is lower than the national average but higher than the south east average.⁶⁵ There were 33,360 students enrolled with the Universities in 2010/11, representing around 13% of the population.⁶⁶</p> <p>Implications for the City Plan The City Plan will need to ensure adequate provision of different types of housing and supporting infrastructure is available to support the needs of the growing population. The City Plan will need to promote economic growth in a range of employment sectors to meet the populations' needs.</p>	Population
Housing	<p>There are a number of issues related to housing:</p> <ul style="list-style-type: none"> • Brighton & Hove has the highest overcrowding rate outside London⁶⁷ • Despite the recent downturn, the city's housing remains largely unaffordable to the majority of 	Material assets Population

⁶⁴ Census 2011

⁶⁵ <http://www.nomisweb.co.uk/reports/imp/la/2038431760/report.aspx?#ls>

⁶⁶ [Joint Strategic Needs Assessment \(consultation draft\), 2012](#)

⁶⁷ [Sustainable Community Strategy 2010](#)

Social Issues

Issue	Description	SEA / SA topic
	<p>residents⁶⁸</p> <ul style="list-style-type: none"> • In 2011 the average cost of a property is over ten times a person’s average income in the city⁶⁹ • The annual affordable housing need is much greater than actual build delivery levels⁷⁰ <p>Housing affordability Housing affordability is a major issue for the city, particularly for families and newly forming households. A lack of decent affordable housing contributes to social exclusion, impacts on labour supply and thus economic prosperity, generates long distance commuting and threatens public services. Given the evidence of the scale of housing need, planning must ensure that the affordable housing secured as part of new residential development across the city matches the local housing/accommodation needs and requirements of particular groups and communities (e.g. families, key workers, the elderly, gypsies and travellers and those with support needs). In 2010/11 affordable housing delivery levels were low with only 8 units delivered, compared to 100 in the previous monitoring year. This is reflective of the lower delivery levels of housing occurring in the city, with 2010/11 delivering the lowest amount of housing in the last 10 years.⁷¹ Housing delivery increased slightly in the 2011/12 period.</p> <p>The Affordable Housing Viability Study was initially carried out in 2007 to test the viability of developments to provide affordable housing at a range of different quotas (from 40% to 50%) and at that time found that development is viable if 40% of the units built are affordable. This Study has recently been updated and tested various development scenarios of houses and flats at delivering 5, 10 and over 15 units at various levels of affordable housing (20-40%) and found that different amounts of affordable housing were viable for each of the development scenarios.</p> <p>Housing Need The Housing Requirements Study (2011) was updated in September 2012 to take into account the</p>	Human Health Social

⁶⁸ Housing Costs Update 2012
⁶⁹ Data from NOMIS and the Land Registry (£27,398 to £291,440)
⁷⁰ [Housing Needs Survey 2005](#)
⁷¹ [Annual Monitoring Report 2010/11](#)
⁷² [BHCC Student Housing Strategy 2006-2014](#)
⁷³ [Student Houses and Houses in Multiple Occupation Concentration Assessment 2012 \(BHCC\)](#)

Social Issues

Issue	Description	SEA / SA topic
	<p>initial release of Census data relating to population, age, sex and number of households and has carried out projections of future housing need against a range of scenarios, including a demographic based scenario and an economic growth scenario, both taking account of net migration. The study concludes that a realistic projection for housing requirement is 16,500 dwellings over the 2010-2030 plan period.</p> <p>As a benchmark, the South East Plan 2009 set a housing delivery target of 11,400 for the 2006-2025 period which was tested as deliverable given the constraints of the city.</p> <p>Housing Type Brighton & Hove has a relatively small average household size at 2.25 people. The Housing Requirements Study update (2012) indicates that 65% of the overall demand for homes in the city over the plan period will be for two and three-bedroom properties (34% and 31% respectively); 24% will be for one-bedroom and 11% will be for four plus-bedroom properties.</p> <p>Sites with potential for housing A Strategic Housing Land Availability Assessment is updated on an annual basis to monitor likely housing delivery and to identify sites with potential for housing development. The most recent SHLAA indicates that the identified supply of residential units that can be delivered between 2010 and 2030 is 10,748. In addition, the likely contribution of windfall sites to development capacity was calculated at 780. This brings the total potential supply to 11,528.</p> <p>Student Housing There are approximately 34,000 students at Brighton and Sussex Universities and both the universities and their students make an important contribution to the economy of the city, estimated at £65million. The recruitment of new full time students is expected to increase gradually over the coming years and as a result there is expected to be a significant shortfall of bed spaces in purpose built student accommodation. The private sector has responded to the increasing demand for student housing and there has been a significant conversion of family housing to student occupied Houses in Multiple Occupation (HMO) in many neighbourhoods.</p>	

Social Issues		
Issue	Description	SEA / SA topic
	<p>The city has the highest number of HMOs in the UK at around 15,000 and in some areas of the city, HMOs have led to neighbourhoods being dominated by the student population, including Bevendean, Coombe Road, Hartington Road, Hanover and Hollingdean. “Studentification” of areas can bring about rapid changes to the local populations, housing markets and residential environments in these areas.⁷² A study was completed in 2012 to assess the actual concentration of student housing and HMOs in these wards and showed that whilst many streets had a concentration of between 10 and 20% student occupied HMOs, some streets had a concentration that exceeded 20%.⁷³</p> <p>Data received from the council’s Revenues team showed that in 2010/11 the average monthly number of properties to which student exemptions applied was 3,460. However it is understood that this only includes full student exemption where all residents are students, and does not include properties where one of the residents is working and the rest are students for example, which account for around one third more. Actual full exemption numbers have been increasing year on year, with the average monthly figure for 2006/07 being 2,465. There is a need to balance the housing requirements of students with the requirements of local residents, ensure that family housing is retained to enable local needs to be met, whilst maintaining the local characteristics of neighbourhoods.</p> <p>How can the City Plan address issues associated with housing? The City Plan will need to ensure there is an adequate supply of different types and sizes of housing, to meet a variety of needs, in line with a growing population. The City Plan will need to ensure that housing delivered includes affordable housing.</p>	
Health and deprivation	<p>Brighton & Hove is a member of the World Health Organisation’s Healthy Cities Network, whose healthy urban planning principles include:</p> <ul style="list-style-type: none"> • Human health as a key element of sustainable development • Co-operation between planning and health agencies 	Population Human Health Social

⁷⁴ All health data taken from Sustainable Community Strategy 2010 unless otherwise specified.

⁷⁵ [Joint Strategic Needs Assessment \(Consultation Draft\) 2012](#)

⁷⁶ [Joint Strategic Needs Assessment \(Consultation Draft\) 2012](#)

⁷⁷ [City Performance Plan Targets Cabinet Report January 2012](#)

⁷⁸ http://www.apho.org.uk/default.aspx?QN=HP_METADATA&ArealD=50375

Social Issues

Issue	Description	SEA / SA topic
	<ul style="list-style-type: none"> • Health integrated plans and policies <p>Healthy urban planning aims to positively influence the determinants of health particularly by the encouragement of healthy lifestyles and the provision of infrastructure that facilitates that lifestyle. This encompasses the need to provide access to healthy housing, sport facilities, recreation, cultural and community facilities, healthy food, care and health facilities.</p> <p>Local Health Issues ⁷⁴</p> <p>The main issues for health in the city include health inequalities, mental health and suicide, alcohol and substance misuse, sexual health, and cancer. Air Quality Objectives are also exceeded at various roadside locations across the city – see Air pollution section. Other local health issues also include obesity, teenage pregnancy and prevalence of smoking.</p> <p>The Joint Strategic Needs Assessment also identified the following issues as having potential for high impact (in order of highest impact) on health: cancer, mental health, alcohol, flu immunisation, weight, nutrition, smoking, domestic & sexual violence, unemployment, housing, physical disability, musculoskeletal conditions, access to cancer screening, education, fuel poverty, emotional health, child poverty, diabetes, dementia, HIV & Aids, and Coronary heart Disease. ⁷⁵</p> <p>The national target is to reduce mortality from suicide by 2009/10/11 by 20% from a 1995 baseline. In Brighton & Hove this would mean that the mortality rate would be no more than 12.9 per 100,000 population. Data from 1995 to 2007 showed the mortality rate to be 13.8 which showed progress towards this target. However data from 2010 shows the mortality rate to be approximately 9/100,000 population showing the target has been met. ⁷⁶</p> <p>Brighton & Hove ranks the highest 5% of PCTs for alcohol specific mortality in males. Brighton & Hove is the tenth worst in the country for hazardous drinking. Brighton & Hove is among the worst 10% of PCTs for alcohol related violent crime.</p>	

⁷⁹ [City Performance Plan Targets Cabinet Report January 2012](#)

⁸⁰ http://www.apho.org.uk/default.aspx?QN=HP_METADATA&AreaID=50375

Social Issues		
Issue	Description	SEA / SA topic
	<p>Brighton & Hove commonly has the highest rate of drug related deaths in the country. There are an estimated 2000 Problematic Drug Users in Brighton & Hove, (those using crack cocaine or heroin) equating to 14.7 per 1,000 population.</p> <p>Smoking is the main cause of premature illness and preventable death in the city, with 20% residents smoking.</p> <p>Sexually transmitted infection rates continue to rise, particularly among young people. The rate of teenage pregnancy has decreased significantly from a 1998 baseline of 49.7 per 1000 population of 15-17 year olds to 36.5 in 2009⁷⁷ and is no longer significantly different from the England average.⁷⁸</p> <p>Poor diet and lack of physical activity lead to an increased risk of coronary heart disease, certain cancers and diabetes. In Brighton & Hove 20.2% of adults are obese. In 2010/11 8.2% of children in reception year were found to be obese and 15.2% of year 6 pupils are obese.⁷⁹ However, obesity levels in Brighton & Hove is significantly better than the England average.⁸⁰</p> <p>How can the City Plan address local health issues? The City Plan will need to ensure a range of infrastructure, such as health facilities, but also include housing and employment opportunities are delivered. The City Plan will need to encourage sustainable travel, both through provision of infrastructure, but also through location of development. The City Plan will need to ensure that the wider needs of communities are met.</p>	
Deprivation	<p>Based on the Index of Multiple Deprivation 2010, Brighton & Hove is ranked as the 66th most deprived authority in England⁸¹. This has increased from 79th in 2007 and from 86th in 2004 and 95th in 2000, although cannot be directly comparable due to changes in measuring deprivation. 11% of Super Output Areas (SOA) in the city fall within the 10% most deprived SOAs in England when looking at “overall” deprivation. This has increased from 9% in 2007. 11 of these SOAs fall within the 5% most deprived in the country. This has increased from 8 areas in 2007. The Reducing Inequalities Review (2007) highlights that significant inequalities continue to exist between different areas and communities in the</p>	Population Human Health Social

⁸¹ Brighton & Hove City Council, Policy Performance and Analysis team.

Social Issues

Issue	Description	SEA / SA topic
	<p>city. It also found that the majority of “deprived” people do not live within the cities “deprived areas” although those facing multiple deprivation do tend to live within the city’s most deprived areas.⁸²</p> <p>The Review found the major socio-economic problems the city faces are around:</p> <ul style="list-style-type: none"> • Health inequalities, particularly around mental health • Drug, alcohol and substance misuse • Low or no skills among sections of the population • A quarter of all children live in households with no working adults • High number of people claiming incapacity benefits • High number of people on and off Job Seekers Allowance • Above average number of young people not in education, employment and training (NEET) <p>Health and Deprivation⁽⁸³⁾</p> <p>The 2005 Brighton and Hove Strategy to Reduce Inequalities set out a number of health inequalities targets between neighbourhood renewal areas and the rest of the city. These have been updated to look at progress and have been adapted to compare the most deprived 20% of the population with Brighton and Hove as a whole to meet with the current measurement of inequalities in terms of the Index of Multiple Deprivation (IMD) 2007.</p> <p>The city is on track to meet the current local health inequalities targets in relation to all age all cause mortality and deaths from circulatory disease (under 75). The city is not on track to meet the current local health inequalities targets in relation to deaths from cancer (under 75), emergency hospital admissions and over 65 years emergency hospital admissions.</p> <p>However, there are still significant inequalities across the city. Using data for 2006-2008 for deaths and 2009/10 for admissions, if those in the 20% most deprived areas had the same mortality or emergency admissions rates as in the 20% least deprived there would be:</p> <ul style="list-style-type: none"> • 59 fewer deaths per year 	

⁸² Reducing Inequalities Review (OCSI Ltd 2007)

⁸³ All health inequalities data taken from Joint Strategic Needs Assessment 2011

⁸⁴ www.hmrc.gov.uk/stats/personal-tax-credits/child_poverty.htm

Social Issues

Issue	Description	SEA / SA topic
	<ul style="list-style-type: none"> • 12 fewer deaths from cancer of those aged under 75 years • 12 fewer deaths from circulatory diseases of those aged under 75 years • 3,226 fewer emergency admissions • 1,022 fewer emergency admissions of those aged 65 years or over <p>Life expectancy between the 10% most deprived and 10% least deprived Lower Super Output Areas is also wide. Life expectancy for men ranges from 71 years in the most deprived to 81.1 years in the least deprived and for women life expectancy ranges from 78.6 to 84.5 years. For men this gap is wider than the national average.</p> <p>Child Poverty The difference in the percentage of children living in poverty also varies across the city. In 2009 22% of children across the city were found to be living in poverty, equivalent to the England/Wales average. However in some wards, notably Moulsecoomb & Bevendean and East Brighton child poverty levels are more than twice the city average (44.7% and 46% respectively).⁸⁴ The council is currently developing a Child Poverty Strategy that will recommend focussing on those across the city with the greatest needs.</p> <p>How can the City Plan address deprivation? The City Plan will need to ensure a range of infrastructure, such as health facilities, housing including affordable housing and local employment opportunities are delivered. The City Plan will need to encourage sustainable travel, both through provision of infrastructure, but also through location of development. The City Plan will need to ensure that the wider needs of communities are met.</p>	
Noise	<p>Noise can be a significant issue in built up urban areas, which can act as a disturbance but can also act as a threat to human health⁸⁵. Noise guidance provided by the World Health Organisation states “general daytime outdoor noise levels of less than 55 decibels are desirable to prevent any significant community annoyance.”</p>	Human Health

⁸⁵ http://www.euro.who.int/Noise/Activities/20030123_1

⁸⁶ www.noisemapping.defra.gov.uk

Social Issues		
Issue	Description	SEA / SA topic
	<p>The main generator of background noise in Brighton & Hove is road traffic. DEFRA has undertaken a comprehensive noise mapping study, the results of which indicate that there are many areas within the city where noise (from road traffic) exceeds the WHO guidelines, with some areas around major road junctions actually exceeding 75 db⁸⁶. This includes many of the roads situated within the Development Areas and Special Areas and is already impacting on areas of open space situated near these roads, including Preston Park and Hove Park. Any further growth in traffic could lead to an increase in the noise levels, leading to a severe loss of tranquillity as well as posing risks to health.⁸⁷ Noise from traffic is exempt from noise legislation and it can not be deemed a statutory nuisance under the Environmental Protection Act 1990.</p> <p>The mapping exercise carried out by DEFRA has informed the preparation of a noise action plan to manage transport noise across the Brighton agglomeration, published in March 2010. The action plan will seek to manage noise issues and effects including noise reduction if necessary. In Brighton & Hove, it identified that approximately 2,250 dwellings (4,100 people) within 'important areas' required further investigation for potential action because of the effects of road traffic noise, and of these, 1,400 dwellings (2,600 people) were a 'first priority'. For each 'Important Area' that is identified, DEFRA expect that the relevant highway authority will consider what, if any, actions might be taken. This should include exploring the scope for erecting noise barriers; installing low noise road surfaces; local traffic management measures; or improving sound insulation.</p> <p>How can the City Plan address this? The City Plan will need to encourage sustainable transport, either through provision of infrastructure or location of development. At implementation stage, noise, particularly in rooms fronting the roadside should be a consideration. The impact of noise relating to the building stage of development on health will also need to be considered.</p>	
Infrastructure	<p>Electricity Supply The National Grid has reported no current issues with provision and that the electricity service provider EDF is responsible for securing supply⁸⁸. EDF Energy is aware of a significant number of potential</p>	Material Assets

⁸⁷ www.london.gov.uk/mayor/strategies/noise/index.jsp

⁸⁸ Brighton & Hove Infrastructure Capacity Assessment 2005-2026

⁸⁹ Brighton & Hove Infrastructure Capacity Assessment 2005-2026

Social Issues

Issue	Description	SEA / SA topic
	<p>developments throughout the city of Brighton & Hove, all of which represent a substantial increase in the demand for electricity. Unlike many major cities and towns Brighton & Hove can often see its 'peak' load demands occurring in the summer due to its major industry of tourism. In addition the city can only be approached from 180 degrees due to its coastal location, which is a major consideration when seeking routes in to reinforce the electricity network.</p> <p>There are a number of major EDF Energy substations within the city most of which are close to or at their optimum capacity and EDF have carried out a number of investigations in order to identify how best to overcome this problem.</p> <p>EDF Energy has taken an approach of moving loads around major substations with the aim of 'freeing up' spare capacity to meet new demand. These network changes are being planned now and will take place during 2005/12. It is envisaged that there will be no issues with electricity supply in the foreseeable future.</p> <p>Gas Supply There are no current issues with gas supply ⁸⁹</p> <p>Broadband Supply Physical data infrastructure is owned by two providers in Brighton & Hove, BT and Virgin. BT have 5 exchanges across the city, with plans to upgrade all in 2012. Virgin have an extensive fibre network covering most but not all parts of the city. Central Government has set a target of 90% of the population to be able to access Super Fast Broad Band (80-100 megabits per second). Brighton & Hove aspires to provide ubiquitous access to high speed broadband in order that the city can compete with the world's top digital cities, as well as address social exclusion. To achieve SFBB speeds, BT will need to upgrade some of the existing copper-based infrastructure and although Virgin's existing system can support SFBB, there are commonly reported issues relating to Virgin's coverage, speed and outages.</p>	

Economic Issues

Issue	Description	SEA / SA topic
Economy	<p>The UK recently suffered its longest and deepest recession since the 1930's resulting in a 6% loss in output between the end of 2008 and 2009⁹⁰. The UK economy grew by only 0.8% in 2011, however shrunk by 0.3% in the last quarter of 2011 and a further 0.2% in the first quarter of 2012 meaning the UK is officially back in recession.⁹¹ It is estimated that city may lose 3,400 public and private sector jobs as a result of the Coalition Government's deficit reduction programme. This, in addition to the projected additional 2,700 working age people means that around 6,000 new jobs will need to be created by 2014 simply to maintain the current employment rate⁹². With Census data showing a higher than predicted local population, the amount of new jobs that needs to be created in order to maintain the employment rate may need to be higher. However, recent findings from the Employment Land Review 2012 shows that there has a 16.8% growth in jobs in the last 15 years which outperforms both national and regional trends, and that the city has proved relatively resilient through the recession.</p> <p>The City Employment and Skills Plan 2011-2014 states that it is not impossible for the city to create these jobs, however there is no guarantee that they will be of sufficient quality to enable residents to remain living in a city where the cost of living is high, nor that the jobs will be filled by local residents. It is not clear where post recession recovery jobs will come from, but the city has recently become part of the Coast to Capital Local Enterprise Partnership, which aims to support the creation of 100,000 private sector jobs. The city council has identified environmental industries as a priority sector, along with food and drink manufacturing, retail, digital media, creative industries, financial services and high technology manufacturing.⁹³</p> <p>In 2008, the Brighton & Hove economy was estimated to be worth £4.2bn⁹⁴. Gross Value Added (GVA) per head had risen to £20,659 in 2008/09 but remains below the regional average of £21,257⁹⁵ & ⁹⁶. Continued low GVA per head in the city suggests that there is still scope for</p>	Economic

⁹⁰ BHCC City Employment & Skills Plan 2011-2014
⁹¹ Office for National Statistics
⁹² BHCC City Employment & Skills Plan 2011-2014
⁹³ BHCC City Employment & Skills Plan 2011-2014
⁹⁴ [Sustainable Community Strategy 2010](#)
⁹⁵ [State of the City Report 2011](#)

Economic Issues

Issue	Description	SEA / SA topic
	<p>Brighton & Hove to have a more productive economy, e.g. by creating more jobs in businesses and sectors that produce more value per worker ⁹⁷.</p> <p>Average Earnings Average weekly earnings for full time workers in 2011 (Earnings by residence) were lower than regional but higher than the national average, which is in line with ongoing trends ⁹⁸. Low average earnings could be indicative of a high proportion of workers being employed in intermediate or lower paying occupations or sectors, however figures suggest that the lower paid workers in the city earn the same as lower paid workers nationally, and that it is the higher paid earners in the city that are earning less than higher paid workers nationally ⁹⁹.</p> <p>Business Density At the start of 2007 there were 9,625 VAT registered businesses in Brighton & Hove. However, jobs density (0.77 per adult aged 16-64) remains below the regional average ¹⁰⁰.</p> <p>Self-employment According to NOMIS 12.5% of the economically active population in the city was self-employed in 2011/12 which is higher than the national and regional averages and is now similar to levels that were found across the city in 2007 before a reduction to around 10% occurred. 85% of businesses in the city employ fewer than 11 people, which is the same as the regional average (84%) ¹⁰¹. 12% of businesses employ between 11 and 49 people, which is marginally higher than the south east figure (11%).</p> <p>How can the City Plan address this? The City Plan needs to ensure an adequate supply of land for a range of employment purposes, uses and sectors is available and reflects the needs of the local economy, whilst aiming to make</p>	

⁹⁶ <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-250308>

⁹⁷ BHCC City Employment & Skills Plan 07/08-10/11

⁹⁸ <http://www.nomisweb.co.uk/reports/lmp/la/2038431760/report.aspx>

⁹⁹ [Sustainable Community Strategy 2010](#)

¹⁰⁰ <http://www.nomisweb.co.uk/reports/lmp/la/2038431760/report.aspx#tabearn>

¹⁰¹ Annual Business Enquiry 2006 via NOMISWEB

Economic Issues

Issue	Description	SEA / SA topic
	the local economy more productive.	
Employment	<p>The percentage of people who were economically active and in employment in 2011/12 was 70% which is the same as the national average but lower than the regional average ¹⁰². The employment rate decreased by 2.2% over the period 2004-2009. This is despite 6,300 more people being in work now than in 2004 and is due to the increase in the working age population. ¹⁰³</p> <p>The city is exporting more workers than it attracts and high levels of travel to and from the city increase pressure on the transport infrastructure. Long-term economic sustainability is only likely to be achieved by developing high value added businesses locally that will retain higher skilled workers.</p> <p>3.4% of the working age population claimed Job Seekers Allowance in 2011/12. Approximately one quarter of the claimants were people aged between 18-24.</p> <p>Worklessness</p> <p>According to the NOMIS Labour Market Profile for Brighton & Hove (2011/12), around 23% of local population are not in work, with around a third of these wanting to work and the remaining not wanting to work for reasons such as being a student, looking after a home, carers, disabled, retired or have simply ceased looking for work. Evidence from the Learning & Skills Council suggest that many of these individuals have low skills and are at risk of labour market exclusion, or may face multiple barriers to labour market entry and that various outreach, community based learning will be needed to tackle multiple labour market disadvantage. ¹⁰⁴</p> <p>Skills</p> <p>Brighton & Hove has one of the most highly qualified adult populations in the country, with 46% of residents holding a Level 4+ (degree or equivalent) qualification. ¹⁰⁵ 5.6% of the working age population have no qualifications, which is decreasing year on year in line with national and</p>	Economic Social

¹⁰² <http://www.nomisweb.co.uk/reports/lmp/la/2038431760/report.aspx?#ls>

¹⁰³ BHCC City Employment & Skills Plan 2011-2014

¹⁰⁴ BHCC City Employment & Skills Plan 07/08-10/11

¹⁰⁵ <http://www.nomisweb.co.uk/reports/lmp/la/2038431760/report.aspx?#ls>

Economic Issues

Issue	Description	SEA / SA topic
	<p>regional trends. However, educational attainment in schools is below average, with Brighton & Hove ranking 251 out of 353 (where 1 is the best) in educational attainment at key stage 4 (GCSEs).¹⁰⁶</p> <p>There is a concern regarding the number of young people who are Not in Education, Employment or Training (NEET) which increased from 7.8% of young people aged 16-19 in 2008 to 8.4% in 2011¹⁰⁷.</p> <p>How can the City Plan address this?</p> <p>The City Plan needs to ensure an adequate supply of land for a range of employment purposes, uses and sectors is available and reflects the needs of the local economy, whilst aiming to make the local economy more productive. The City Plan needs to support the needs of locally unemployed or low-skilled residents to enable them to seek meaningful employment.</p>	
<p>Employment Land</p>	<p>An Employment Land Study Review was carried out in 2012 to provide information on current employment sites and premises and to assess the future need for B class employment uses. It assessed future need under a range of growth scenarios including those based on economic growth, previous development trends and future labour supply based on the City Plan’s housing target with two of the scenarios implying higher economic growth than the city has previously achieved. The overall space requirements relating to the different scenarios ranged between 127,220m² to 155,670m², all of which indicated a need for a mix of office (B1) and also industrial (B2/B8). The range of floorspace requirements are all higher than that previously predicted in the Employment Land Review 2006 & 2009 and although the requirement for office B1 is broadly comparable, there is a positive need for industrial premises which was previously not considered to be required, ranging from 43,430m² to 81,950m².</p> <p>The City Plan will need to ensure that the various types of employment premises can be accommodated by allocating sufficient employment land to ensure the local economy is not constrained.</p>	

¹⁰⁶ Annual Report of Director of Public Health 2010
¹⁰⁷ [City Performance Plan Targets Cabinet Report January 2012](#)

Economic Issues

Issue	Description	SEA / SA topic
<p>Tourism</p>	<p>The tourism sector is an important source of employment in the city. In 2010/11 the value of tourism to the city was measured at £732 million with over 18,500 jobs supporting the tourist industry.¹⁰⁸ & ¹⁰⁹</p> <p>The tourism industry has been successful in responding to changing markets, taste and style and the city has seen nearly a decade of steady investment in its tourism product. Culture and creativity are important to the city’s prosperity and to enhancing the built and natural environment, and have been at the heart of many of the city’s regeneration projects such as the Brighton Dome and Museum Complex, Jubilee Street and the Seafront regeneration. The recent designation of the South Downs National Park also provides opportunities for the city with the potential to act as a gateway for many people wishing to access the Downs. An Eco-tourism Strategy for the city currently being progressed.</p> <p>However, one of the key challenges for tourism is finding the right balance between the night-time economy and the need to remain an attractive and safe destination for other visitors including those attending conferences and meetings. In addition, while the City fills its hotels and restaurants at many times during the year there remain significant periods when supply exceeds demand. Failing to address this absence of demand can only inhibit the ability of local businesses to invest in the maintenance and improvement of their businesses and the development of their staff. The lack of local skilled labour is a threat to the continued development of the sector and for businesses. There is a need to promote the idea of hospitality and tourism industry as one offering a career path especially for local people. The recent economic downturn also presents challenges to the city as a tourist destination.</p> <p>To ensure that Brighton & Hove continues to be a destination tourists wish to visit, there needs to be ongoing investment in infrastructure and the physical environment, including sustainable transport, there is a need to encourage and implement sustainable tourism principles, there is a need to improve the quality of offer and increase standards, all of which need to be achieved by partnership working.</p>	<p>Economic Social</p>

¹⁰⁸ [City Performance Plan Targets Cabinet Report January 2012](#)

¹⁰⁹ Tourism South East 2010 The Economic Benefit of Tourism in Brighton & Hove

Economic Issues

Issue	Description	SEA / SA topic
	<p>How can the City Plan promote tourism? The City Plan will need to protect and enhance local assets, including the natural and built environment, support growth in the retail sector to support the city’s designation as regional shopping centre, ensure sustainable transport infrastructure options are provided and improved, and improve the quality of offer.</p>	
<p>Other sectors</p>	<p>Other sectors in the city which employ a significant amount of employees and make a significant contribution to the economy include the Financial & Business Services (approx 45,000 employees), Retail & Wholesale (approx 20,000 employees), Education & Health (approx 34,000 employees), and the Creative Industries (approx 24,000 employees).¹¹⁰ In addition, the third sector, including voluntary, community and not for profit organisation was estimated at £96.5 million in 2008¹¹¹</p> <p>How can the City Plan support other important sectors? The City Plan will need to ensure an adequate supply of appropriate and affordable workspace that meets the needs of a variety of sectors and ensure adequate protection of a range of employment uses.</p>	

¹¹⁰ City Employment & Skills Plan 2007/08-2010/11

¹¹¹ State of the City Report 2011

4.2 Limitations of data collection

- 4.21 In some circumstances specific data has not been available for collection, has been limited or has not been as updated recently. Much of the data is collected or collated by external agencies leaving the city council little control over the collection or presentation.
- 4.22 There are also some significant data gaps which are listed below. The baseline will continue to be monitored and updated whenever data becomes available. Key gaps will also be addressed through future monitoring proposals.
- 4.23 The following are areas where there are gaps:
- Accurate data for commercial and industrial waste, and construction and demolition waste.
 - Accurate data relating to sustainability of new developments due to changes in the Sustainability Checklist.
 - Accurate data relating to Houses in Multiple Occupation occupied by non-students.
 - Data from the Census 2001 is now considerably out of date. Some data from the Census 2011 has now been released however considerable data is still to be released over the next 2 years.
- 4.24 As already stated, changes in monitoring requirements for local authorities and replacement of the National Indicators will also create difficulties when comparing data from the previous baseline situation. In addition, many former datasets are no longer available on government websites for comparison purposes. In future, these indicators will need to be deleted and/or replaced.

4.3 Predicted Future Baseline

- 4.31 The SEA Directive requires an assessment of *“the relevant aspects of the current state of the environment and likely evolution thereof without implementation of the plan or programme”*
- 4.32 The issues identified and the trends from the baseline give an indication of the possible future state of the city. Although the evolution of the area is dependant on many factors and is therefore fairly uncertain to predict, the City Plan will have some influence. The following trends are considered likely to continue:
- The population is likely to increase.
 - The amount of all types of open space available per person is likely to reduce as the population increases.
 - Nitrogen Dioxide is likely to remain above the legal limit in many roadside locations.
 - The state of the city’s listed buildings and Conservation Areas are likely to continue to improve.
 - The number of people on the housing register is likely to remain high.
 - Market housing is likely to remain unaffordable to many of the city’s residents.
 - The number of bus passenger journeys is likely to continue to increase.
 - Bathing water quality is likely to remain high.
 - The overall quality of the aquifer may remain poor.

- A large number of properties are likely to remain at risk of surface water flooding.
- The proportion of properties with water meters is likely to continue to increase, and individual domestic consumption of water is likely to continue to fall.
- GVA per head is likely to remain below the national average.
- The economic benefit of the tourist industry is likely to increase.
- The percentage population in employment is likely to remain the same.
- GCSE results are likely to continue to improve.
- The amount of total police reported crime is likely to continue to fall.
- Domestic consumption of gas and electricity is likely to continue to fall, whereas industrial and commercial consumption of gas is likely to continue to increase.
- The amount of waste collected per head is likely to fall and the amount of waste recycled is likely to increase.

Trend data on other issues is either not available due to a lack of comparable data or data has fluctuated so that no discernable trend can be identified.

- 4.33 In addition, in former stages of City Plan, notably Preferred Options and Revised Preferred Options, the SA made an assessment of policy options, including a business as usual (e.g. no plan) approach. These assessments also give an indication of the likely evolution without implementation of the Plan.

Section 5 Sustainability Objectives, Baseline Data and Context

5.1 Introduction

5.11 In establishing a clear scope of the Sustainability Appraisal of the City Plan Part 1 and in compliance with statutory requirements, it was first necessary to review and develop an understanding of:

- Possible appraisal objectives
- Other plans, policies and strategies of relevance to the plan
- Baseline information on environmental, social and economic conditions in Brighton and Hove, and
- Key sustainability issues facing Brighton and Hove.

5.12 The object of the Sustainability Appraisal is to understand the economic, social and environmental implications of the City Plan Part 1, so that it can be developed to promote, rather than prevent the achievement of sustainable development. A clear understanding of sustainable development is essential to ensure that the appraisal scope covers the right issues and asks the right questions.

5.13 This section forms stage A4 of the Sustainability Appraisal process and brings together the information gathered in the earlier stages (policy review, baseline information and sustainability issues stages A1, A2 and A3),

5.2 Sustainability Appraisal Framework

5.21 The SA objectives were first identified in the scoping phase. Objectives and indicators have been revised in response to comments received during various stages of consultation. Each of the following tables outlines the 22 Sustainability Appraisal Objectives and the indicators for each objective.

Key:

- CPP – indicator proposed to be reported through the City Performance Plan (may be subject to change)
- SDL – Single Data List (largely replaces the National Indicator set)
- LOI – Local Output Indicator reported through the Authority Monitoring Report
- SC – indicator reported through the Sustainability Checklist

Table 5.1 Sustainability Appraisal Framework

1.	To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.
	<ul style="list-style-type: none"> • (CPP) Number and area of designated sites (SAC, SSSI, SNCI, LNR, NP and RIGS) presented as a percentage of the total administrative area of Brighton & Hove
	<ul style="list-style-type: none"> • % area of SSSI land in: <ul style="list-style-type: none"> (a) A favourable condition or (b) An unfavourable recovering condition (c) An unfavourable no change condition (d) An unfavourable declining condition (e) Area part destroyed / destroyed

	<ul style="list-style-type: none"> Extent of natural and semi-natural green space found in the council area (including hedgerows)
	<ul style="list-style-type: none"> Amount of land managed primarily for biodiversity in: <ul style="list-style-type: none"> (a) Local Nature Reserves (b) Other sites
	<ul style="list-style-type: none"> Area of semi-natural green space available for community use per 1000 population
	<ul style="list-style-type: none"> Achievement of specified local 'Biodiversity Action Plan' (BAP) targets
	<ul style="list-style-type: none"> Change in: <ul style="list-style-type: none"> (a) Populations of local Species Action Plan (SAP) species (b) Area of semi-natural habitat within greenway network
	<ul style="list-style-type: none"> Extent and condition of habitats included in Local Biodiversity Action Plan LBAP
	<ul style="list-style-type: none"> (SC) Does the development avoid damage to biodiversity (presented as sqm of habitat or amount of features added or lost.)
	<ul style="list-style-type: none"> Amount of developer contributions made to off site open space/parks
	<ul style="list-style-type: none"> Amount of Ancient Woodland (hectares)

2.	To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning
	<ul style="list-style-type: none"> What air quality monitoring exists across the city
	<ul style="list-style-type: none"> Are levels of NO2 below the National Air Quality Objectives
	<ul style="list-style-type: none"> Are levels of fine particles PM10 below the National Air Quality Objectives?
	<ul style="list-style-type: none"> Extent of Air Quality Management Area (AQMA) in Brighton and Hove

3.	To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and their settings and archaeological sites effectively.
	<ul style="list-style-type: none"> Number and % of Listed Buildings (Grade I and II*): <ul style="list-style-type: none"> (a) On the 'At Risk' register; (b) Subject to unauthorised alterations; (c) Subject to demolition; and (d) Successful enforcement actions.
	<ul style="list-style-type: none"> Number of conservation areas in the city.
	<ul style="list-style-type: none"> Number of conservation areas de-designated, or parts of conservation areas de-designated, as a result of loss of historic and architectural detail.
	<ul style="list-style-type: none"> Percentage of conservation areas where the loss of historic or architectural detail is considered to be a 'significant' or 'very significant' problem.
	<ul style="list-style-type: none"> Number of Conservation Areas with character appraisals.
	<ul style="list-style-type: none"> Number of Conservation Areas with management plans.
	<ul style="list-style-type: none"> Amount of eligible open spaces managed to Green Flag award standard comparing (in percentage terms) the amount of open space managed to green flag standards against total open space.
	<ul style="list-style-type: none"> Amount and type of open space per 1,000 population in comparison to the open space standards.
	<ul style="list-style-type: none"> (SC) How much open space has been created and/or lost as a result of development?.

4.	To protect, conserve and enhance the South Downs and promote sustainable
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	forms of economic and social development and provide better sustainable access.
	<ul style="list-style-type: none"> • How many Bus services operate to the south downs from Brighton & Hove? • Tourist numbers visiting the south downs? • Sustainable routes available to access the Downs • Amount of land under: <ul style="list-style-type: none"> 1. Entry level; and 2. High level environmental stewardship schemes.

5.	To meet the essential need for decent housing, particularly affordable housing.
	<ul style="list-style-type: none"> • (CPP) (H5): Gross affordable housing completions. (a) + (b) where: (a) = sum of socially rented houses (b) = sum of intermediate affordable housing • (SDL 002-02) Number of new dwellings completed: Private enterprise, RSL, LA tenures • (CPP) Number of new affordable homes that are family sized • House price to income ratio in Brighton and Hove • Number of new bed spaces created in purpose built student accommodation • Number of properties where student-based council tax exemption applies

6.	To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development
	<ul style="list-style-type: none"> • (CPP) Thousands of bus passenger journeys (i.e. boarding's) per year in the authority • (CPP) (NI186) Per capita reductions in CO2 emissions in the LA area (transport). • Bus User Satisfaction - Percentage of bus users satisfied with local buses • (CPP) Number of School Travel Plans have been implemented. • Number of cycle journeys in the city. • (CPP) Pedestrian movements • (CPP) (NI177) Local bus journeys originating in the authority area. • (CPP) (NI167): Congestion – average journey time per mile (peak). • (LOI) Amount of developments that have been defined by the Government & Transport Planning as needing a Transport Assessment, to have carried out a Transport Assessment. • (SC) Percentage of residential or mixed use development within 500m of a bus stop or rail station. • (SC) Percentage of residential or mixed use development that ensures that all vehicle infrastructure is in accordance with Manual for Streets guidance • (LOI) Amount of major commercial development and those considered to have transport implications to have travel plans or other measures to maximise the use of sustainable modes of transport.
	<ul style="list-style-type: none"> • (NI 175) & (LTP1&2): Access to frontline health services within 15-30 minutes by public transport (under review under LTP3) • Estimated traffic flows for all vehicle types (million vehicle kilometres). • (CPP) Car club usage in Brighton & Hove. • (SC) Percentage of developments where parking is provided for Car Club • (SC) Percentage of developments where parking is provided for Cycle parking

	<ul style="list-style-type: none"> • Increase in cycle parking /improvements across the city.
	<ul style="list-style-type: none"> • % of the resident population who travel to work by: <ul style="list-style-type: none"> - private motor vehicle (car, taxi or motorbike); - public transport; - on foot or cycle.
	<ul style="list-style-type: none"> • % of the resident population travelling over 20 km to work
	<ul style="list-style-type: none"> • The proportion of new development which is meeting its travel plan objectives.
	<ul style="list-style-type: none"> • The effectiveness of travel plans at employment sites.
	<ul style="list-style-type: none"> • The level of growth of traffic on key routes within the city council area.

7.	Minimise the risk of pollution to water resources in all development
	<ul style="list-style-type: none"> • No. of potentially contaminated sites which have been classified as HIGH priority and will require further investigation as part of the City Council's Contaminated Land strategy
	<ul style="list-style-type: none"> • Water resource supply – demand balance
	<ul style="list-style-type: none"> • Brighton & Hove bathing water quality
	<ul style="list-style-type: none"> • Status of groundwater resource as measured by requirements of the Water Framework Directive
	<ul style="list-style-type: none"> • (SC) Percentage of new developments incorporating SUDs within the development area and/or beyond the development area.
	<ul style="list-style-type: none"> • Area of city at risk to flooding? (non-tidal).
	<ul style="list-style-type: none"> • Number of units designed to deliver estimated water usage patterns of : 105 litres per person per day (CSH ¾) 80 litres per person per day (CSH 5/6)

8.	Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
	<ul style="list-style-type: none"> • (SC) Percentage of developments incorporating measures to reduce consumption of water.
	<ul style="list-style-type: none"> • Proportion of properties with water meters installed
	<ul style="list-style-type: none"> • Per capita domestic consumption of water

9.	To promote the sustainable development of land affected by contamination
	<ul style="list-style-type: none"> • Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environmental Protection Act 1990.

10.	Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
	<ul style="list-style-type: none"> • What parts of the coast are protected in Brighton & Hove and why?
	<ul style="list-style-type: none"> • Area of city at risk from tidal flooding.
	<ul style="list-style-type: none"> • (SDL 243-01): The number of developments in a flood risk areas granted contrary to the advice of the Environment Agency.

11.	To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment
	<ul style="list-style-type: none"> • Level of GVA per head.

	<ul style="list-style-type: none"> • (BD1): Total amount of additional employment floorspace – by type (gross and net). Employment type is defined by Use Class Orders: B1 (a), (b) and (c), B2 and B8. Floorspace measured in m2.
	<ul style="list-style-type: none"> • BD2): Total amount of employment floorspace on previously developed land – by type (expressed as % of BD1 gross).
	<ul style="list-style-type: none"> • (BD3): Employment land available – by type. Employment type is defined by Use Class Orders: B1 (a), (b) and (c), B2 and B8. Expressed in hectares.
	<ul style="list-style-type: none"> • (CPP) Economic benefit of tourism generated annually in Brighton & Hove
	<ul style="list-style-type: none"> • Employment supported by visitor economy in Brighton & Hove
	<ul style="list-style-type: none"> • How many constructing futures and major project partnerships have been developed in Brighton & Hove
	<ul style="list-style-type: none"> • (CPP) (NI177) Reduce the number of young people aged 16-18 who are NEET

12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors

	<ul style="list-style-type: none"> • Proportion of VAT registered businesses / 10,000 adults in Brighton & Hove
	<ul style="list-style-type: none"> • Percentage population in employment
	<ul style="list-style-type: none"> • How many businesses are EMAS or ISO registered in Brighton & Hove?
	<ul style="list-style-type: none"> • (NI152) Working age people on out of work benefits
	<ul style="list-style-type: none"> • (CPP) (NI075) % of 15 yr olds in LA maintained schools achieving GCSEs at grade A*-C or equivalent
	<ul style="list-style-type: none"> • Levels of Section 106 agreements that have included education facilities across the city.
	<ul style="list-style-type: none"> • Level of section 106 agreements that have included Public Art in B & H

13. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap between those with the poorest health and the rest of the city

	<ul style="list-style-type: none"> • All age all cause mortality
	<ul style="list-style-type: none"> • Infant mortality rate: deaths up to 1 year per 1,000 live births
	<ul style="list-style-type: none"> • (CPP) Age standardised mortality rates for people aged under-75 <ul style="list-style-type: none"> • All cancers • All circulatory disease • Suicide
	<ul style="list-style-type: none"> • Life expectancy at birth
	<ul style="list-style-type: none"> • (NI055) Obesity among primary school children in year 6; and obesity among children in reception class.
	<ul style="list-style-type: none"> • Gap between the highest and lowest scoring Super Output Areas, IMD Health, deprivation and disability domain.
	<ul style="list-style-type: none"> • (SC) Percentage of development incorporating provision for food growing.
	<ul style="list-style-type: none"> • (NI 175) & (LTP1): Access to frontline health services within 10 minutes by public transport and walking (under review under LTP3)
	<ul style="list-style-type: none"> • (SC) Percentage of developments incorporating the provision of on site outdoor space.

	<ul style="list-style-type: none"> • (CPP) (NI8) Adult participation in sport
	<ul style="list-style-type: none"> • % of the resident population who travel to work by <ul style="list-style-type: none"> • private motor vehicle (car, taxi or motorbike) • public transport • on foot or cycle
	<ul style="list-style-type: none"> • % of the resident population travelling over 20 km to work.
	<ul style="list-style-type: none"> • Number of people on the housing register
	<ul style="list-style-type: none"> • (CPP) (NI 112) Under 18 conception rate
	<ul style="list-style-type: none"> • Number of 'Warm Front' grants made to people – Measured as the rate per 1000 people and the proportion given to people aged over 60
	<ul style="list-style-type: none"> • (CPP) (NI 39) Alcohol-harm related hospital admission rates.
	<ul style="list-style-type: none"> • (CPP) (NI 51) Effectiveness of child and adolescent mental health services
	<ul style="list-style-type: none"> • (NI 59) Initial assessments for children's social care carried out within 7 days of referral.
	<ul style="list-style-type: none"> • (CPP) (NI 123) Smoking prevalence in adults (4 week quitters)
	<ul style="list-style-type: none"> • (CPP) (NI 130) Social Care clients receiving self directed supported.
	<ul style="list-style-type: none"> • (CPP) (NI 135) Carers receiving needs assessment or review
	<ul style="list-style-type: none"> • (CPP) (NI146) Adults with learning disabilities in employment
	<ul style="list-style-type: none"> • (CPP) (NI 150) Adults in contact with secondary mental health services in employment.
	<ul style="list-style-type: none"> • Level of road traffic-related noise at key junctions

14.	To integrate health and community safety considerations into city urban planning and design processes, programmes and projects
	<ul style="list-style-type: none"> • Levels of Section 106 agreements that have included new GP facilities in the City
	<ul style="list-style-type: none"> • (NI 175) & (LTP1): Access to frontline health services within 10 minutes by public transport and walking (under review under LTP3)
	<ul style="list-style-type: none"> • (CPP) The percentage of residents surveyed who said they feel fairly safe or very safe outside in their local area <ul style="list-style-type: none"> • a) during the day • b) after dark
	<ul style="list-style-type: none"> • Number of new developments incorporating secured by design features
	<ul style="list-style-type: none"> • (CPP) Number of total police recorded crimes.
	<ul style="list-style-type: none"> • (CPP) (NI047) People killed or seriously injured in road traffic accidents.
	<ul style="list-style-type: none"> • WTE GPs per 1,000 population

15.	To narrow the gap between the most deprived areas and the rest of the city so that no-one is seriously disadvantaged by where they live.
	<ul style="list-style-type: none"> • Gap between the lowest and highest scoring SOA in the education, skills and training domain of IMD
	<ul style="list-style-type: none"> • (CPP) % of young people aged 16 to 24 year olds in who are NEET
	<ul style="list-style-type: none"> • (NI152) Working age people on out of work benefits.
	<ul style="list-style-type: none"> • Proportion of adults with poor literacy and numeracy skills
	<ul style="list-style-type: none"> • % of the population living in the 20% most deprived super output areas in the country
	<ul style="list-style-type: none"> • % of the population over 60 who live in households that are income deprived
	<ul style="list-style-type: none"> • (CPP) (NI 116) % of children under 16 living in households in receipt of out of

	work benefits
	<ul style="list-style-type: none"> • (CPP) (NI187) Tackling fuel poverty – people receiving income based benefits living in homes with a low energy efficiency rating.
	<ul style="list-style-type: none"> • (CPP) (NI 158) % non-decent council homes
	<ul style="list-style-type: none"> • The percentage of 15-year-old pupils in schools maintained by the local authority achieving five or more GCSEs at grades A*-C or equivalent.
	<ul style="list-style-type: none"> • (CPP) (NI 112) Under 18 conception rate
	<ul style="list-style-type: none"> • Number of council tax benefits claims citywide
	<ul style="list-style-type: none"> • Number of housing benefit claims city wide

16.	To engage local communities in the planning process
	<ul style="list-style-type: none"> • Are communities involved in the planning process
	<ul style="list-style-type: none"> • (CPP) (NI004) % people who feel they can influence decisions in their locality

17.	To make the best use of previously developed land
	<ul style="list-style-type: none"> • (BD2) Total amount of employment floorspace on previously developed land.
	<ul style="list-style-type: none"> • Percentage of development situated within Greenfield land.
	<ul style="list-style-type: none"> • H3: New and converted dwellings on PDL
	<ul style="list-style-type: none"> • Losses of employment land in (i) development /regeneration areas and (ii) local authority areas

18.	To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings.
	<ul style="list-style-type: none"> • (CPP) Average annual domestic consumption of gas and electricity in kWh
	<ul style="list-style-type: none"> • (CPP) Annual consumption of gas and electricity (commercial and industrial)
	<ul style="list-style-type: none"> • (CPP) (NI186) Per capita reductions in CO2 emissions in LA area (domestic).
	<ul style="list-style-type: none"> • Percentage increase in home energy efficiency
	<ul style="list-style-type: none"> • (SC) Percentage of developments with low and zero carbon (LZC) technologies proposed
	<ul style="list-style-type: none"> • (E3): Renewable energy generation (mw)

19.	To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events
	<ul style="list-style-type: none"> • Amount and number of contributions that have been made to the sustainable buildings fund
	<ul style="list-style-type: none"> • (SC) Percentage of developments incorporating green walls and/or and green roofs.
	<ul style="list-style-type: none"> • (CPP) (NI 188) Planning for Climate Change Adaptation
	<ul style="list-style-type: none"> • (E1): The number of planning permissions granted contrary to the advice of the Environment Agency on the grounds of tidal flooding.

20.	To encourage new developments to meet Code for Sustainable Homes/BREEAM “Excellent” standard.
	<ul style="list-style-type: none"> • (SC) Amount of the following: <ul style="list-style-type: none"> a) Number (and %) of small scale new build meeting Level 3 CSH b) Number (and %) of medium scale new build residential meeting Level 3 CSH

	<p>c) Number (and %) of medium scale new build non-residential meeting BREEAM “very good”</p> <p>d) Number (and %) of major new build residential meeting Level 4 CSH</p> <p>e) Number (and %) of major new build non-residential meeting BREEAM “excellent”</p>
	<ul style="list-style-type: none"> • (SC) Percentage of Applications submitting a sustainability checklist

21.	To promote and improve integrated transport links and accessibility to health services, education, jobs and food stores
	<ul style="list-style-type: none"> • (SC) Percentage of developments that allow good, safe and direct access between the development and local schools, employment, shops, GP surgeries and leisure facilities.
	<ul style="list-style-type: none"> • (NI 175) & (LTP1): Access to frontline health services within 15-30 minutes by public transport (under review under LTP3)
	<ul style="list-style-type: none"> • (SC) Percentage of development incorporating provision for food growing.
	<ul style="list-style-type: none"> • % of the resident population who travel to work by private motor vehicle (car, taxi or motorbike)
	<ul style="list-style-type: none"> • % of the resident population who travel to work by public transport
	<ul style="list-style-type: none"> • % of the resident population who travel to work on foot or cycle
	<ul style="list-style-type: none"> • % of the resident population travelling over 20 km to work

22.	To reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.
	<ul style="list-style-type: none"> • How many businesses are EMAS or ISO registered in Brighton and Hove
	<ul style="list-style-type: none"> • Municipal Solid Waste (MSW) tpa
	<ul style="list-style-type: none"> • Commercial & Industrial Waste tpa
	<ul style="list-style-type: none"> • Construction & Demolition Waste tpa
	<ul style="list-style-type: none"> • (CPP) (NI191) Kg of household waste collected per head
	<ul style="list-style-type: none"> • (CPP) (NI192) % of household waste sent to be: <ul style="list-style-type: none"> • Recycled • Composted • Used to recover heat, power, and other energy sources.
	<ul style="list-style-type: none"> • No. of recycling points in Brighton & Hove
	<ul style="list-style-type: none"> • (SC) Percentage of developments designed with space for storage of recyclable materials.

5.3 Amendments to the SA Framework

5.31 The Framework has been revised during various iterations of the document. Representations received during consultation periods have led to some indicators being deleted or amended, some indicators have been removed or amended. For example due to updated government guidance, and changes in the council’s Sustainability Checklist several indicators have been replaced with new indicators.

5.32 Quality of Life indicators that were previously collated through the Audit Commission have now been removed as progress against them can no longer be ascertained.

5.4 Future Amendments to the SA Framework

5.41 Responses received during consultation on the Policy Options Papers suggested that the Sustainability Appraisal objectives would benefit from reviewing and updating. To maintain a level of consistency with previous appraisals, it is considered necessary to keep the existing suite of objectives for the assessment of the City Plan Part 1. However, Part Two of the City Plan, the Site Allocations and Development Plan Document, will present an opportunity to review all of the objectives and the SA Framework, and this will take place with widespread involvement at Scoping Stage.

5.42 Defra has recently consulted (August 2012) on a range of indicators to monitor sustainable development which will be incorporated into future SA Frameworks once confirmed and adopted.

5.5 Links with Strategic Environmental Assessment topics

5.51 The following table shows how the SA objectives meet the requirements of the Strategic Environmental Assessment Directive by showing the link between the SA objectives and the environmental issues identified in the Directive.

Table 5.2 Links to SEA Directive topics

SEA Directive Topic	SA Objective
Biodiversity	1, 3, 4
Population	5, 11, 12, 13, 14, 15, 16
Human health	13, 14, 15
Fauna and flora	1, 3, 4
Soil	7, 9, 22
Water	7, 8,
Air	2, 6, 21
Climatic factors	10, 18, 19, 20
Material assets	3, 4, 5, 17, 22
Cultural heritage	3, 4
Landscape	3, 4

Section 6 Summary of Stages Sustainability Appraisal and City Plan

6.1 Introduction

- 6.11 This section of the report summarises all of the appraisal work which has been undertaken to support and inform the development of the City Plan. Further information about the assessment of alternative options and the findings of these can be found in Appendix G
- 6.12 It should be noted that the City Plan was previously known as the Core Strategy and was changed as a result of the Localism Act. This section therefore refers to previous versions of the City Plan as the Core Strategy.

6.2 Core Strategy: Issues & Options – October 2005

- 6.21 The 'Issues and Options' document published in October 2005 set out five possible broad approaches to accommodating the predicted development of the city over the next 20 years. It was anticipated and explained that the preferred option would be likely to consist of a combination of two or more of these broad approaches (or any credible alternative approach put forward during community involvement). In summary, the five approaches were:

- A - Accessibility-led approach
- B - Regeneration-led approach
- C - Urban character /urban capacity-led approach
- D - Limited development and expansion on the urban fringe
- E - identification of large strategic development sites to provide at least 1,000 new homes in each case

- 6.22 The Issues & Options document also covered a range of specific issues and potential options for dealing with the issues, which were arranged under the headings of the Community Strategy:

- An Enterprising City
- A Safer City
- A Healthy City
- An Inclusive City
- An Affordable City
- An Attractive City
- A Mobile City
- A Learning City
- A Sustainable City

- 6.23 The Sustainability Appraisal Scoping Report was published at Issues & Options stage setting out the Options for Growth as well as the baseline for the city. The SA at this stage also carried out an appraisal of the Strategic Objectives of the Core Strategy against the Sustainability Appraisal Objectives to highlight the potential for conflict.

6.3 Core Strategy: Preferred Options – November 2006

6.31 This set out the preferred options for:

1) Approaches to accommodating growth with it considered that a combination of approach A and approach C would be the most sustainable. Based on this, the preferred options for directing significant mixed-use, high density development to the following 10 areas was put forward as the Spatial Strategy:

- Marina
- Brighton Station / New England area
- Central Seafront
- Eastern Road / Edward Street
- Hove station
- Lewes Road
- London Road / Preston Road
- Old Shoreham Road
- Portland Road
- Western Seafront

2) Policies to support the implementation of the spatial strategy. These were set out under the themes of the revised Community Strategy:

1. Promoting Resource Efficiency and Enhancing the Environment
2. Improving Housing and Affordability
3. Promoting Enterprise and Learning
4. Strengthening Communities and Involving People
5. Reducing Crime and Improving Safety
6. Improving Health and Well-Being
7. Promoting Sustainable Transport

3) A number of major cross-theme projects and areas:

1. Seafront Regeneration
2. Shoreham Harbour
3. The Urban Fringe
4. Community Stadium
5. Developer Contributions
6. Potential Area Action Plan

6.32 The Sustainability Appraisal undertook full appraisal of the options for accommodating growth, the options for policies, and options for cross-themed projects as outlined above.

6.33 The SA considered the options against reasonable alternatives and a “do nothing” scenario in order to ensure the preferred option was the most sustainable. The options were tested against the Sustainability Appraisal Framework to determine their potential to give rise to significant effects and highlight the sustainability implications of each option.

6.34 The appraisals recommended how options could be improved and where mitigation measures would be required to prevent or reduce adverse impacts and the final preferred options incorporated the SA findings.

6.35 A Sustainability Appraisal report setting out the findings of the appraisals was published in 2006 and was subject to the same consultation period as the Preferred Options document.

6.4 Core Strategy: Revised Preferred Options – June 2008

6.41 A number of matters arose following the Preferred Options stage which required a change of approach to the Preferred Strategy, therefore a Revised Preferred Options stage was carried out. The Core Strategy Revised Preferred Options identified broad locations for development (the Spatial Strategy), identified Special Areas and addressed city wide matters through the Core Policies as shown below.

6.42 Spatial Strategy:

6.421 Following the findings from the Area Assessments¹¹² other background studies and building on the assessment of the Approaches to Growth, the following areas were put forward as development areas:

- Brighton Centre and Churchill Square
- Brighton Marina
- Lewes Road
- London Road / New England Quarter
- Eastern Road and Edward Street
- Hove Station
- Shoreham Harbour / South Portslade

6.422 Seven “special areas” were also put forward, which were either carried forward from the Preferred Options stage or had been otherwise identified as needing a coordinated approach for managing future change. They were:

- The Seafront
- Central Brighton
- Valley Gardens
- Urban Fringe
- The South Downs
- Sustainable Neighbourhoods
- Residential Renewal Areas

6.43 Core Policies

6.431 As a result of the consultation from the Preferred Options stage, 19 core policies were developed to cover a range of city-wide matters such as housing, employment, transport, heritage, urban design, sustainable buildings, open space and biodiversity.

¹¹² Area Assessments were carried out in 2007 on the 10 areas as identified to deliver the Spatial Strategy in the Preferred Options 2006. The purpose of the Area Assessments was to identify the potential of areas to be taken forward in the Core Strategy and to assess their capacity for future development. In addition, it identified sites with development potential. A number of background studies, as well as findings from consultation events, were used to inform the potential of the development areas. The Area Assessments put forward options for development at each of the development areas.

- 6.44 The Sustainability Appraisal undertook full appraisal of the options for the Development Area policies, the Special Area policies and the Core Policies as outlined above.
- 6.45 The development areas themselves were not subject to assessment through SA (e.g. to decide on which areas should be incorporated) as the areas themselves were developed as a result of the original assessments carried out on the Approaches to Growth. However the options for development in the areas (as proposed by the Area Assessments) were subject to assessment through SA against the sustainability appraisal framework with recommendations and mitigation put forward.
- 6.46 The potential for Shoreham Harbour for accommodating development was re-examined at Revised Preferred Options stage in light of proposals put forward by SEEDA at that time. Due to the early stage of technical assessments, no contribution from developments in the area to the strategic requirements of the Core Strategy Revised Preferred Options was assured and therefore the SA covered only the principle and potential of redevelopment at Shoreham Harbour.
- 6.47 During the re-appraisal of the Spatial Strategy, Growth Option D – allowing limited development on the urban fringe was also reconsidered; due to the proposed modifications to the boundary of the proposed National Park in 2007. The proposed modifications meant that the urban fringe would be much reduced and narrower and potentially less capable of development. In addition, the detailed area assessment of potential development areas to accommodate future employment floor space needs and the initial findings of the Strategic Housing Land Availability Assessment (2008) along with the emerging regeneration potential of Shoreham Harbour clarified the decision to continue to exclude the urban fringe option from the spatial strategy and it was therefore appraised as a Special Area. As a result of consultation comments, the option of limited development of some urban fringe sites in the long-term was also considered in the appraisal of Special Area policy: Urban Fringe; and the option of accommodating 20,000m² new office floorspace post 2016 on urban fringe sites was also considered in the appraisal of the Strategic Employment Sites Core Policy.
- 6.48 In all cases, the SA considered the options against reasonable alternatives and in most cases against the “do nothing” scenario in order to ensure the revised preferred option was the most sustainable. The options were tested against the Sustainability Appraisal Framework to determine their potential to give rise to significant effects and highlight the sustainability implications of each option.
- 6.49 The appraisal recommended how options could be improved and where mitigation measures would be required to prevent or reduce adverse impacts and the final revised preferred options incorporated the SA findings. The results of the appraisal were published in the Sustainability Appraisal Report 2008, which was circulated for consultation alongside the Core Strategy Revised Preferred Options.

6.5 Core Strategy: Proposed Amendments Paper – June 2009

- 6.51 Following the Revised Preferred Options stage, a number of further matters arose which required eight policies to be changed significantly:

- Shoreham Harbour was identified as a New Growth Point by the Government, and was identified as a Strategic Development Area in the South East Plan capable of providing 10,000 new homes. The site covered an area administered by Brighton & Hove City Council and Adur District Council and therefore the planning proposals will be delivered through a Joint Area Action Plan (JAAP) as well as being submitted as part of both authority's Core Strategy.
- Findings from the Strategic Housing Land Availability Assessment which indicated that the housing target relied heavily on windfall and that it would not be met unless the Urban Fringe was considered for housing in the long term.
- Notification of the intended boundary of the South Downs National Park.

6.52 In addition, other guidance, including PPS 12 Local Spatial Planning, which enabled Strategic Allocations¹¹³ to be included within Core Strategies, as well as other decisions or recommendations received throughout 2008/09 resulted in significant changes to a number of other policies, as well as resulting in a change to the Spatial Strategy.

6.53 In accordance with the council's standards of consultation set out in the adopted Statement of Community Involvement, the council undertook a further stage of public consultation on the eight policies that underwent significant changes, as follows:

- Brighton Marina & Black Rock
- New England Quarter & London Road
- Shoreham Harbour & South Portslade
- Urban Fringe
- Sustainable Transport
- Developer Contributions
- Housing Delivery
- Planning for Sustainable Economic Development

6.54 At this stage, the Shoreham Harbour policy included five possible options for delivery, as background evidence to guide the development potential of the area was still incomplete. The Sustainability Appraisal assessed the five options against the sustainability appraisal framework and made recommendations regarding which options performed most positively and recommendations for mitigation.

6.55 The Sustainability Appraisal undertook an assessment of the remaining seven policies. The SA did not assess these policies against alternative options, as it was considered that alternative options had been considered during former stages of policy development.

6.56 The results of the appraisal were published in the Sustainability Appraisal Report 2009, which was circulated for consultation alongside the Core Strategy Proposed Amendments Paper.

6.6 Core Strategy Submission - January 2010

¹¹³ Strategic Allocations are those considered critical to the delivery of the Strategy.

- 6.61 The city council submitted its Core Strategy to the Secretary of State in January 2010. This document included seven Development Area policies, which included strategic allocations for development, six Special Area policies and 18 Citywide policies. At this stage, all policies were final, with the exception of the policy for Shoreham Harbour, which included three options for delivery. The Sustainability Appraisal of this policy included the appraisal of the three options put forward and all other final policies underwent further assessment against the sustainability appraisal framework. The results were published in a Sustainability Appraisal Report which formed part of the submission.
- 6.62 Soundness issues were raised during an exploratory meeting with the Planning Inspector in May 2010 concerning housing delivery and following procedural meetings held as part of the examination process, as well as further evidence gathering and anticipated changes to national planning policy the city council took the decision to withdraw the Core Strategy to enable it to be updated and amended.

6.7 City Plan: Policy Options Papers – October 2011

- 6.71 Following withdrawal of the Core Strategy, four policy options papers were produced. The policy options papers considered the key issues that the City Plan needed to tackle in addition to providing the opportunity to consult on new policy areas. The policy options papers covered the following subjects:
- Housing Delivery
 - Employment and Economic Development
 - Park & Ride
 - Student Housing
- 6.72 The Housing Delivery paper included various targets and options for delivery, including the delivery of housing on a named Greenfield site, Toads Hole Valley located on the urban fringe, the delivery of housing on employment sites, and the delivery of housing on sites that are currently designated as open space. The Housing Delivery options paper did not set out alternative sites to Toads Hole Valley, as the inclusion of this site was based on background evidence¹¹⁴ which showed that Toads Hole Valley was the only urban fringe site that had significant development potential.
- 6.73 The Employment and Economic Development paper included a variety of issues for consideration, including recognition of Central Brighton's role as a primary office location, allocating additional employment floorspace, protection of secondary office accommodation, identification and allocation of strategic employment sites, protection of strategic industrial estates and ensuring an adequate supply of secondary business premises.

¹¹⁴ An assessment of sites located on the urban fringe was carried out as part of the Strategic Housing Land Availability Assessment (2009) that formed background evidence for the Submission Core Strategy (2010). This assessment looked at 49 sites in terms of potential for housing and to identify constraints. The technical paper found that the majority of urban fringe sites considered in the SHLAA were not suitable for residential development reflecting significant policy or other constraints. The paper found that there were limited opportunities to deliver residential development from the urban fringe.

- 6.74 The Park & Ride paper looked at the issue of whether Park and Ride should remain a priority in Brighton & Hove.
- 6.75 The Student Housing paper looked at issues of the over-concentration of Houses in Multiple Occupation in some wards and the issue of new build student accommodation.
- 6.76 Each topic paper set out the various issues and had options for delivery, all of which were subject to assessment by the Sustainability Appraisal, which resulted in recommendations and mitigation being put forward. The results of the appraisal were published in the Sustainability Appraisal Report 2011, which was circulated for consultation alongside the Policy Options Papers.

6.8 Draft City Plan Part 1 – May 2012

- 6.81 Following consultation on the policy options papers, the first draft City Plan Part 1 was produced containing eight Development Area policies, including a new policy covering the Toads Hole Valley area, six Special Area policies, and 22 Citywide policies including a new policy covering Student Housing. The Development Area policies include a total of 18 Strategic Allocations.
- 6.82 Policies were revised to take into account representations received on the Proposed Submission document, as well as representations received at Policy Options Paper stage. In addition, policies were amended to ensure conformity with the National Planning Policy Framework.
- 6.83 In order to ensure the appraisal of the policies was up to date and incorporated findings from up to date studies, all final draft policies underwent assessment by the Sustainability Appraisal regardless of whether they had changed from the Proposed Submission stage.
- 6.84 The Sustainability Appraisal made numerous recommendations for changes to policies, as well as recommendations for mitigation and monitoring. The results were published in the Sustainability Appraisal Report which was circulated for consultation alongside the City Plan Part 1.

6.9 Current stage: Proposed Submission City Plan Part 1 – January 2013

- 6.91 The City Plan Part 1 contains eight Development Area policies, six Special Area policies and 22 Citywide policies all of which were put forward at the draft Plan stage (May 2012).
- 6.92 Since the previous stage of Sustainability Appraisal (May 2012) the Plan's policies have been refined and revised to take into consideration comments received during the public consultation period, as well as to incorporate findings of updated studies.
- 6.93 The table in Appendix C of this report scopes whether a further appraisal was needed for each of the amended policies. This scoping exercise found some policies to remain largely unchanged, whereas others have been amended and strengthened to add clarity or additional emphasis. However, in these cases the overall impact on the SA objectives would not be altered and therefore no further appraisal has been carried out.

- 6.94 However, some policies were changed to the extent the Sustainability Appraisal findings were different than the previous assessment and therefore required further assessment at this stage. The list of those which have undergone further assessment, or those where the appraisal has been updated to incorporate the findings of revised or new studies can be found in Section 7. The summaries of these appraisals can also be found in Section 7, with the full assessments in Appendix D of this report.
- 6.95 The assessments of the policies which have not undergone assessment against the Sustainability Appraisal Framework at this stage can be found in Section 9 and Appendix D of the [Sustainability Appraisal Report May 2012](#). However the Cumulative Impacts section of this report provides a summary of the findings of all assessments.

6.10 The Assessment of Reasonable Alternatives

- 6.101 In order to show the link between the final policies and the various options that have been considered throughout the development of the Core Strategy/City Plan, a table has been produced in Appendix G which tracks each policy's development, and the alternative options that have been considered. This table shows, in the majority of cases, that the final policy reflects the most sustainable option, as assessed against the SA framework.

Section 7 Summary of City Plan policies

7.1 Introduction

This section summarises the findings of the assessments against the SA Framework.

- 7.11 Refinements have been made to policies resulting from comments received during the recent consultation period (Regulation 18 – May to July 2012) and from findings of recently updated studies or strategies.
- 7.12 A scoping exercise was carried out on all policies to highlight the main changes and to determine whether the revised policy needed further appraisal, which can be found in Appendix C.
- 7.13 Following this, final appraisals have been undertaken on policies which have undergone changes significant enough to require re-assessment against the SA Framework in order to assess the impacts, or those where the SA needed to reflect updated studies. The full appraisals can be found in Appendix D.
- 7.14 Policies that did not require further assessment were found to be largely unchanged. The changes that did take place did not affect the impacts previously identified in the Sustainability Appraisal of the draft City Plan Part 1, May 2012. For the impacts of these policies please refer to Section 9 or Appendix D of the Sustainability Appraisal May 2012.

The following table shows which policies did or did not require further assessment:

Table 7.1: Table to show policies requiring further assessment

Policy	SA required at this stage
DA1 Brighton Centre and Churchill Square	Yes
DA2 Brighton Marina	Yes
DA3 Lewes Road	Yes
DA4 New England Quarter and London Road	Yes
DA5 Eastern Road and Edward Street	Yes
DA6 Hove Station Area	Yes
DA7 Toads Hole Valley	Yes
DA8 Shoreham Harbour	Yes
SA1 The Seafront	Yes
SA2 Central Brighton	Yes
SA3 Valley Gardens	Yes
SA4 Urban Fringe	Yes
SA5 The South Downs	No
SA6 Sustainable Neighbourhoods	No
CP1 Housing Delivery	Yes
CP2 Sustainable Economic Development	No
CP3 Employment Land	Yes
CP4 Retail Provision	No
CP5 Culture & Tourism	No
CP6 Visitor Accommodation	Yes
CP7 Infrastructure & Developer Contributions	No

Policy	SA required at this stage
CP8 Sustainable Buildings	Yes
CP9 Sustainable Transport	Yes
CP10 Biodiversity	No
CP11 Flood Risk	No
CP12 Urban Design	Yes
CP13 Public Streets and Spaces	No
CP14 Housing Density	No
CP15 Heritage	Yes
CP16 Open Space	No
CP17 Sports Provision	No
CP18 Healthy City	No
CP19 Housing Mix	No
CP20 Affordable Housing	No
CP21 Student Accommodation & Houses in Multiple Occupation	No
CP22 Traveller Accommodation	No

7.15 In addition, two options for a new policy were assessed, Policy SS1 The Presumption in Favour of Sustainable Development. The new policy will form part of the Spatial Strategy and is proposed in order to respond to guidance for other local authorities from the Planning Inspectorate which aims to ensure that Local Plans demonstrate compliance with national policy, in particular the presumption in favour of sustainable development as set out in the National Planning Policy Framework. The full assessment of the options for this policy can be found in Appendix D.

7.2 Summary of assessments

This section summarises the main findings of the full assessments of the significantly changed policies as well as the new policy SS1. This section provides:

- A table to show the anticipated long term impacts
- A written summary of the potential for positive and negative impact, including some of the potential outcomes
- A summary of any mitigation required
- Recommendations for amendments to the policy

7.21 Recommendations for monitoring have not been included in this iteration of the Sustainability Appraisal, as these were outlined fully in section 12 of the Sustainability Appraisal May 2012 and the assessments of the amended policies have not identified any additional significant impacts that were not previously identified.

7.3 SS1 - Presumption in Favour of Sustainable Development

7.31 Issue: To ensure local plans demonstrate compliance with the NPPF.

7.32 Option 1: Inclusion of model policy as drafted by PINS

7.33 **Option 2:** Inclusion of policy with amendments made by city council
Main difference in wording is the substitution of the original wording “it will always” to “where appropriate”. Other amendments include re-arrangement of original wording. For actual wording, see Appendix D

Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Biodiversity	+	-?	+	+	++	-?	+	?	+	+	++	++	+	+	+		+	+	+	+	+	-
Air quality	+	-?	+	+	+	-?	+	?	+	+	+	+	+	+	+		+	+	+	+	+	-
Distinctiveness																						
South Downs																						
Housing																						
Car Journeys																						
Water pollution																						
Water use																						
Contamination																						
Coastal flooding																						
Employment																						
Economic Dev.																						
Health																						
Comm. Safety																						
Deprivation																						
Engagement																						
Use of PDL																						
Energy use																						
Climate Change adaptation																						
BREEAM/CSH																						
Accessibility																						
Waste																						

7.34 Conclusion

- The main difference between the two policies that has an impact on the sustainability appraisal is the wording in option 1 “it will always” which is substituted in option 2 to “where appropriate”. The SA considers that this wording in option 2 isn’t as strong as the wording in option 1, is potentially more subjective and may be open to interpretation unless clear circumstances where development is or is not appropriate is included as supporting text.
- The SA found that the wording “it will always” in option 1 may result in more proposals being approved than with option 2. This has therefore led to a more positive score on some of the developmental sustainability objectives for option 1, including provision of housing, employment and economic development.
- There is not considered to be any significant difference between the scores for options against other sustainability appraisal objectives, as the wording in both policy options that requires improvements to local environmental, social or economic conditions would provide mitigation regardless of the amount of development delivered. This wording, in addition to the policies outlined in the NPPF, in cases where only these would be applied, was found to achieve positive outcomes against almost all sustainability appraisal objectives.
- The impact on the objectives relating to reducing car journeys and improving air quality was found to be negative, with it considered unlikely that an increase in development would cause a reduction in car journeys made, nor that total mitigation could be achieved.
- With option 2, there is some degree of uncertainty across most of the objectives, because the circumstances under which a proposal would not be considered appropriate are unknown. For instance, if impacts on biodiversity are grounds for when a proposal is considered not to be appropriate, then the score for option 2 may be more positive than the score for option 1 against the biodiversity sustainability appraisal objective.
- The SA suggests that if option 2 is put forward there needs to be further explanation and clarification in the supporting text, as to what is not considered to be appropriate.

7.35 Recommendations

- Option 1 has potential for stronger positive impact against the developmental objectives, due to the wording “it will always”. However, the difference between the remaining objectives remains insignificant.
- Should Option 2 be put forward as the preferred policy, the SA recommends that the supporting text should clarify circumstances when development would not be considered appropriate.

- In addition to the recommendation outlined in the above paragraph, the following recommendations are applicable for either options:
 1. There is no indication as to what criteria will be used to determine whether the policies in Plan are considered to be “out of date” and as such, would trigger implementation of the latter part of the policy. It may be helpful to define this in the supporting text.
 2. It is noted that the presumption in favour of sustainable development does not apply to locations at risk of flooding and that at these locations the Sequential and Exceptions Tests still apply. It may be useful to highlight this in the supporting text.
 3. It is noted that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined (NPPF s.119) and thus this policy will not be relevant in these situations. Nor does it apply to sites designated as AONB or SSSI (NPPF footnote 9). It may be useful to highlight this in the supporting text.

7.36 Following the Sustainability Appraisal, the final policy incorporated into the City Plan is reflective of Option 1 and has incorporated some of the recommendations outlined above.

7.4 Development Area policies

7.41 DA1 – Brighton Centre & Churchill Square

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	-	+			-	+	-	+		++	++	-/+	+	+	+	+	+		-	+	-

7.411 Conclusion

- As the policy proposes retail development and replacement conference facilities, the policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of employment and economic development.
- The policy is also likely to have a positive impact on the objectives relating to: maintaining local distinctiveness, through anticipated improvements to the public realm and townscape; improving accessibility, as is likely to increase access to services through provision of specific developments as well as improvements to sustainable transport; increasing community safety, through proposals which ensure a balanced range of evening economy uses, and promotion of sustainable energy, through consideration of low and zero carbon decentralised energy infrastructure for current or future development.
- Although the policy contains priorities to promote public and sustainable transport and improve local air quality, the assessment found the policy had potential for a negative impact on the objectives relating to improving air quality and reducing car journeys. New retail development may result in an increase in people travelling by car particularly as the proposed expansion to Churchill Square is the equivalent to an extra 50% of floorspace, as may new conference facilities.
- Any increase in traffic will have implications for health in the long term due to air quality and noise, as well as contributing towards climate change.
- As the policy incorporates proposals for development, there are a number of objectives upon which the policy could have a negative impact, including increasing water consumption and increasing production of waste.

7.412 Mitigation

Development should:

- Consider the impact on adjacent listed buildings and conservation areas. Addressed through policy itself and under CP12 and CP13.
- Maximise opportunities to reduce the need to travel by car and improve air quality. Addressed under CP9.
- Incorporate highly efficient water saving technologies. Addressed under CP8
- Incorporate SUDS within new development and maximise opportunities for implementing biodiversity based SUDS. Addressed under CP8.
- Maximise energy efficiency features. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet high environmental standards. Addressed under CP8.

- Aim to facilitate reduction of waste. Addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18.

7.413 Recommended changes to policy

There were no further recommended changes to the policy.

7.42 DA2: Brighton Marina

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-/+	-	-/+	+	++	-	-	-	+	-	++	++	-/+	+	+	+	+	+	-	-	++	-

7.421 Conclusion

- As the policy proposes specific amount of developments, including housing, employment, and leisure and retail, the policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of housing, employment and economic development, as would be expected. Job opportunities will be created both at construction and operation stage, employment floorspace will be provided to suit a range of needs, and development in the area will help to support the economic growth of the remaining marina area through potentially increased footfall arising from visitors, as well as through an increased local population requiring district centre services.
- It is noted that the policy now requires a lower amount of industrial floorspace to be delivered, based on findings of the updated Employment Land Study. This is not considered to have a negative impact on the employment and economic development objectives for this policy, as the policy will still result in gains in employment generating uses, however this amount will need to be met elsewhere in the city, to ensure the future needs of the city can be met. See mitigation.
- The policy is also likely to have an overall positive impact on the objectives relating to: remediation of contaminated land, particularly through development of the Gas Works site; improving accessibility through the range of development, infrastructure and access improvements that the policy should deliver; improving health, through provision of housing, employment and community/social infrastructure that form some of the wider determinants of health; and is likely to reduce deprivation and inequalities, particularly through delivery of infrastructure for local people but also through the potential for local training and employment.
- The policy includes specific requirements to maximise opportunities for zero and low-carbon technologies to serve development, as well as encourages developers to consider heat network systems, this is likely to have a positive impact on the objective relating to energy consumption.

- The policy requirement for development to be below cliff height should ensure that the setting, and views from and of the South Downs National Park are protected, as well as having benefits for the adjacent historic built environment.
- The policy was found to have mixed impacts on the objective relating to maintaining local distinctiveness. Positive benefits should arise through overall improvements to the district centre and improvements to the public realm and townscape, as well as through the protection of the local historic built environment through ensuring development remains below cliff height as described above. However, although the policy requires housing development to provide open space, the SA considers it unlikely that the full open space requirements of the future population will be met on site, due to site constraints and competing land uses.
- The assessment found that the policy had potential for a negative impact on the objectives relating to improving air quality, and reducing car journeys despite the measures outlined in the policy. A significant amount of development is proposed which is likely to put increased pressure on transport availability and may result in an increase in people travelling by car, as well as car ownership in the local area, or an increase in other employment related journeys, including deliveries by freight. This could have also have a negative impact on the health objective in the longer term.
- As the policy incorporates proposals for development, there could be a negative impact on biodiversity found within or adjacent to the area, some of which is of local, national and international significance, and some of which relies on the unique environment created by the Marina. The policy priority to protect and enhance the biodiversity, geodiversity and key designated sites including the Sites of Nature Conservation Importance (SNIC) and Sites of Special Scientific Interest (SSSI) should address this concern, however the risk remains, reflected in the mixed score awarded to this objective.
- The policy was found to have a negative impact on objectives relating to flood risk, with the Strategic Flood Risk Assessment (SFRA) 2012 identifying areas within the marina at risk of surface water flooding as well as parts being situated within floodzone 3a. In addition, the policy was found to have a negative impact on the objective relating to adapting to climate change, due to the flood risk, with the standard of protection offered by the sea defences likely to reduce as a consequence of climate change.
- In addition, it is likely that any development will cause an increase in waste generation, both at construction and operation stage, which should be addressed under CP8 and existing local and national policy.

7.422 Mitigation

The City Plan must ensure that the city's employment floorspace requirements can be met, and that the reduction in industrial floorspace outlined in this policy is addressed through an increase elsewhere, or through cross-authority working. Met through other policies and Duty to Co-operate.

New development of all types should:

- Maximise opportunities to protect and enhance biodiversity - addressed under CP8 and within policy itself.
- Ensure housing development incorporates provision of open space in accordance with recommended standards, and meets any existing deficiencies either on site or in the vicinity - addressed under CP16 and within policy itself.

- Maximise opportunities to reduce car ownership, travel sustainably and improve air quality. Addressed under CP9.
- Development at the Marina should be mindful of the various sources of flood risk and where possible implement sequential design through the site to reduce the flood risk and the consequences of flood risk. Also, incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible – addressed under CP8 and CP11.
- Incorporate highly efficient water saving technologies - addressed under CP8.
- Be adaptable to the changing climate including the anticipated increase in sea level - addressed under CP8 and CP11.
- Should meet high environmental standards - addressed under CP8.
- Aim to facilitate reduction of waste - addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
- Adverse health impacts associated with development should be reduced and positive impacts should be maximised - addressed under CP18.

7.423 Recommended changes to policy:

There were no further recommendations for changes.

7.43 DA3 – Lewes Road

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+?	-	-/+	+	++	-	-/+	-	+		++	++	-/+	+	+	+	-/++	+	-/+	++	++	-

7.431 Conclusion

- As the policy proposes specific amount of developments, including housing and employment, the policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of affordable housing, employment and economic development, as would be expected. In addition, the provision of student housing has wider benefits, including for existing housing stock (e.g. potential to reduce the need for reliance on HMOs), but also by enabling the Universities to continue to attract students, having wider economic benefits for the city.
- The policy is also likely to have a positive impact on objectives relating to increasing accessibility, through improvements to public transport infrastructure, pedestrian and cycling routes, as well as provision of specific developments including a community building; and improving community safety through improvements to existing open spaces and public realm. There will also be positive impacts for reducing deprivation, particularly through training and employment opportunities arising, and health in the short/medium term, however the potential for increases in traffic and associated impacts on air quality and noise could result in negative impacts in the long term.
- The strategic developments should also have positive impacts on reducing consumption of energy, with the requirement to be zero carbon on some of the allocations, as should the reference to encouraging developers to consider future decentralised energy infrastructure, and was found to have significant

positive impacts on the objective relating to achieving high standards of building sustainability, with one of the strategic allocations required to meet BREEAM outstanding.

- Overall, the impacts on biodiversity were considered to be positive and uncertain. The policy contains various references to improving biodiversity, with this being a priority for the entire Development Area, as well as reference to enhancing nature conservation in the Preston Barracks site. The Falmer Released Land site is adjacent to an SNCI that contains ancient woodland and development in this location would need to ensure the status of this is not compromised. Although development at this site in particular may be considered to increase the risk of adverse impacts on the adjacent ancient woodland, it is understood that mitigation measures, as proposed by the Ecological Report submitted as part of the planning application for the development of the car park at this site, such as ensuring a 15m buffer is maintained between the development site and the ancient woodland, should ensure that adverse impacts are avoided and positive outcomes achieved, however remains uncertain until implementation.
- The policy is considered to have mixed, both negative and positive impacts on the objective relating to maintaining local distinctiveness. The policy should result in improvements to public realm and townscape, and the revisions to the policy should ensure that locally and nationally designated sites are protected, however is likely to increase the pressure on existing open space, particularly towards the south of the development area where open space provision does not meet existing needs.
- The policy is also considered to have mixed impacts on the objective relating to the use of previously developed land. Development across the Preston Barracks site, some of which is not in any productive use is likely to have significant positive impacts on this objective, however development on a Greenfield site will have negative impacts on this objective.
- The policy is also considered to have mixed impacts on the objectives relating to pollution of water and adapting to climate change. Development in this location could increase the risk of surface water flooding, with the A270 identified as a major surface water flow path. The new requirements of the policy relating to the protection of groundwater and retention of Greenfield runoff rates and reduction in heat island effect increase the potential for positive impact, however these are only required in certain parts of the development area.
- The assessment found that the policy had potential to have a negative impact on the objectives relating to air quality and reducing car journeys despite the positive measures and priorities outlined in the policy. New development of any kind is likely to put increased pressure on transport infrastructure available which may result in an increase in people travelling by car, or car ownership, which in turn could lead to a reduction in local air quality. Employment-based journeys, including deliveries by freight, could also increase to the area, also having air quality impacts with NO₂ emissions already exceeding the national objective at monitoring locations in this development area. In addition, although part of the Community Stadiums approved transport strategy, a car park at the Falmer Released Land site will result in an increase in car journeys to the area at certain times.
- In addition, it is likely that any development will cause an increase in waste generation, both at construction and operation stage.

7.432 Mitigation

The City Plan must ensure that the city’s housing and employment floorspace requirements can be met, and that the reduction in housing outlined in this policy is addressed through an increase elsewhere, or through cross-authority working. Met through other policies and Duty to Co-operate.

New development across the Development Area of all types should:

- Incorporate features that enhance biodiversity. Addressed under CP8 and CP10.
- Ensuring the open space needs of the future population can be met. Addressed through CP16.
- Maximise opportunities to reduce the need to travel by car and promote low-car or car free housing. Addressed under CP9.
- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible. Addressed under CP8.
- Incorporate highly efficient water saving technologies. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Aim to facilitate reduction of waste. Addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18.

In addition to general mitigation outlined above, development on Woollards Field should:

- Undertake an ecological survey and incorporate features to encourage biodiversity back to the site following development, including linking the site to the existing green network. Addressed under CP10.
- Ensure that a thorough impact assessment takes place to assess the impact of development proposals on the SDNP and its setting, as well as other locally designated sites.

Development on the Falmer Released Land should:

- Ensure that the adjacent ancient woodland is not compromised by development and incorporate features to encourage biodiversity back to the site following development. Addressed under CP10.

7.433 Recommendations

There were no additional recommendations.

7.44 DA4: New England Quarter & London Road

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	-	+/+		++	-	-	-	+		++	++	-/+	+	+	+	+	++	-	-	++	-

7.441 Conclusion

- As the policy proposes delivery of different types of development, including housing, student housing and office floorspace, as well as the refurbishment and upgrade of existing employment sites, the policy is likely to have a direct and significant positive impact in the medium to long term on the objectives relating to provision of housing, employment and economic development, as would be expected.
- The policy specifies a slight increase in the amount of additional housing units to be delivered compared to former iterations.
- Strategic Allocation 1 names five sites over which 20,000sqm office floorspace will be delivered, and the SA considers this is more likely to result in development being brought forward than with former iterations of the policy, having greater benefits for employment and economic development. In addition, the inclusion of New England House as a Strategic Allocation is considered to have positive impacts in particular for the creative digital and information technologies sector.
- The delivery of purpose built student housing may lead to wider housing benefits, through potential reduced reliance on HMOs, as discussed further in the Student Housing policy.
- The policy is also considered to have a direct and significant positive impact on improving accessibility, as should result in improved sustainable transport routes, improved links in and between the area as well as through delivery of a range of development.
- The policy is likely to have other positive impacts on objectives relating to improving biodiversity, through a specific requirement to improving connections between open spaces and enhancing biodiversity; improving community safety through increased opportunities for natural surveillance arising from mixed use developments and potential for increased footfall; is likely to narrow the gap and reduce inequalities currently found between neighbourhoods in this area, through improvements to the living environment, increased opportunities for training, employment and reduction in crime; and should make the best use of previously developed land with a range of vacant and/or under-utilised sites named in the policy.
- The policy also has the potential to have a positive impact on health, through delivery of measures such as housing, employment, and community infrastructure that are all wider determinants of health. However, there could also be a negative impact on health in the long term through anticipated increases in traffic and the associated reduction in air quality and other transport impacts.
- Although the policy contains a specific priority to improve air quality and achieve a modal shift, new development of any kind is likely to put increased pressure on transport infrastructure available and may result in an increase in people travelling by car, or car ownership in the area, or an increase in employment-based journeys, leading to increased congestion and a reduction in local air quality, with NO₂ emissions already exceeding the national objective at locations in this development area, and this is considered to be significant in the long term.
- In addition, as the policy incorporates proposals for development, there are a number of objectives upon which the policy could have a negative impact including increasing pressure on existing open space, particularly through the delivery of 1185 units of housing, increasing the risk of surface water flooding,

increasing water consumption, and the potential for buildings to be unsuitable to a changing climate and failing to meet high environmental standards.

- Although energy consumption could increase through the delivery of this amount of development, the new requirement in the policy for development to incorporate infrastructure to support low and zero carbon decentralised energy, in particular heat network infrastructure is considered to bring about positive impacts, potentially significant in the long term.
- The impact is also likely to be negative on the objective concerned with reduction of waste, as any development will cause an increase in waste generation, both at construction and operation stage.

7.442 Mitigation

New development of all types should:

- Consider the impact on neighbouring conservation areas, as well as historic buildings located within the area. Addressed under CP12/13.
- Ensure there is adequate provision of open space for the existing and future local population who live and/or work in the area. Addressed under CP16.
- Maximise opportunities to reduce the need to travel by car and improve air quality. Encourage proposals for low-car/car free housing which would be particularly suited to this location. Addressed under CP9.
- Ensure sensitive receptors (in terms of air quality) are located away from the roadside. Addressed by policy itself.
- Ensure a site specific flood risk assessment is carried out in accordance with the recommendations of the SFRA 2012 to ensure surface water flood risk is not increased elsewhere. Addressed through CP11.
- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible. Addressed under CP8.
- Incorporate highly efficient water saving technologies. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet high environmental standards. Addressed under CP8.
- Aim to facilitate reduction of waste. Addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
- Adverse health impacts associated with development should be reduced and positive impacts should be maximised. Addressed under CP18.

7.443 Recommendations

There were no recommended changes to the policy.

7.45 DA5 – Eastern Road and Edward Street

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	-	-/+		++	-	-	-	+		++ ?	++ ?	-/+	+	+	+	++	++	-/+	-	++	-

7.451 Conclusion

- The policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of affordable housing, with the potential for 470 housing units to be delivered locally. In addition, the provision of student housing has wider benefits, including for existing housing stock (e.g. potential to reduce the need for reliance on HMOs), but also by enabling the Universities to continue to attract students, having wider economic benefits for the city. The reduced amount of housing compared to previous versions is not considered to impact negatively as the policy should still result in a significant amount.
- The policy should also bring about significant positive impacts for employment and economic development, through the delivery of employment floorspace, however this is now considered to be uncertain, due to the reduced amount compared to previous versions of the policy.
- The policy was also found to have significant positive impacts on objectives relating to increasing accessibility, through improvements to sustainable transport infrastructure and provision, as well as through delivery of specific developments including healthcare provision, community building and various services; and the objective relating to previously developed land, with development at all strategic sites providing the potential to increase the land use efficiency on these sites.
- The specific requirement for development to incorporate low and zero carbon decentralised energy infrastructure, such as heat networks, in addition to the standards required from development from 2016 and 2019, should result in a significantly positive impacts in the long term on the objective relating to sustainable energy.
- The policy was found to have other positive impacts including enhancing biodiversity through tree-planting and landscaping; should improve community safety; should reduce deprivation, which is currently significant in neighbourhoods in and around the area, particularly through the requirement to secure training places for local people; and should lead to sustainable energy generation with a commitment to deliver district heating throughout the area.
- Although the assessment found the impact to be generally positive against the objective concerned with maintaining local distinctiveness, through anticipated improvements to the public realm and townscape and references to protection of heritage assets, there is concern that the open space needs of any increased population will not be met, with the area not currently meeting the open space requirements of the existing population.
- The impacts were also considered to be mixed on the objective relating to climate change, as although the policy should result in tree-planting and biodiversity enhancements, aiding with climate change adaptation, some of the strategic sites are located within areas of surface water flood risk, with these risks potentially increasing as a result of climate change.
- The assessment found that the policy had potential for negative impacts on the objectives relating to improving air quality and reducing car journeys despite the positive measures contained in the policy and is considered to be of more significance in the medium term, with implementation of the rapid bus-based scheme reducing this significance in the long term. New development of any kind is likely to put increased pressure on transport infrastructure available and may lead to an increase in people travelling by car or other vehicle for personal and employment-related journeys in the local area, having implications on air quality, health and wider environmental issues. In addition, the potential to

investigate re-routing traffic, may simply displace existing air quality and congestion issues to surrounding communities.

- In addition to the above transport pressures, the status of Royal Sussex County Hospital as a sub-regional destination for hospital services and the anticipated amount of hospital floorspace to be delivered is likely to increase the amount of health-related journeys made from outside the area.
- In the short and medium term, the policy was found to have overall positive implications for health, particularly through delivery of housing, employment opportunities and general improved attractiveness throughout the area, however the potential cumulative increase in traffic to and within the area may have health implications.
- As the policy incorporates proposals for development, there are a number of other objectives upon which the policy could have a negative impact. This includes the potential to: increase water consumption; for surface water flood risk to increase and for waste to increase.

7.452 Mitigation

The City Plan must ensure that the city's housing and employment floorspace requirements can be met, and that the reduction in housing and employment floorspace outlined in this policy is addressed through an increase elsewhere, or through cross-authority working. Met through other policies and Duty to Cooperate.

New development of all types should:

- Ensure there is adequate provision of open space for the future local population. Addressed under CP16.
- Maximise opportunities to reduce the need to travel by car and improve air quality. Addressed within policy itself and under CP9.
- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible and sequentially plan development in areas of flood risk. Addressed under CP8 and CP11.
- Incorporate highly efficient water saving technologies. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet high environmental standards. Addressed under CP8.
- Aim to facilitate reduction of waste. Addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18.

7.453 Recommended changes to policy:

There were no recommended changes to policy.

7.46 DA6 Hove Station

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	-	+		++	-	+	-	+		++ ?	++ ?	-/+	+	+	+	++	+	-/+	-	++	-

7.461 Conclusion

- The policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of affordable housing, with 630 units of housing to be delivered over the plan period.
- The policy should bring about significant positive impacts for employment and economic development, through the replacement of some of the existing floorspace in the area, and delivery of some new floorspace, however is considered to be uncertain, due to the reduced amount compared to previous versions of the policy and compared to current provision. However, although a reduction in floorspace is allowed, it is understood that higher value jobs or an increase in job density is anticipated. The creative industries and local people should benefit through the creation of affordable and appropriate workspace and through the requirement to provide training and employment opportunities.
- The policy is also likely to have a significant positive impact on making the best use of previously developed land, through proposals to make more efficient use of under-used sites, and increasing accessibility to services through improvements to the sustainable transport interchange and improvements to the walking and cycling networks, and improved links between the strategic allocation, Hove Station and Hove Park.
- The policy is also likely to have a positive impact on objectives relating to biodiversity, through opportunities to increase local biodiversity; maintaining local distinctiveness, through anticipated improvements to the public realm and townscape; increasing community safety particularly around areas that have been identified as crime hotspots; and reducing deprivation.
- The policy is also considered to have positive impacts on objectives relating to minimising water pollution and adaptation to climate change, through the requirement to protect groundwater and incorporate surface drainage, and on the objective relating to energy, through the requirement for development to consider heat network infrastructure.
- The policy also has the potential to have a positive impact on health, through delivery of measures such as housing, and opportunities for employment, both of which are wider determinants of health. However, there could also be a negative impact on health in the long term through anticipated increases in traffic and the associated reduction in air quality.
- The assessment found that the policy had potential for a negative impact on the objectives relating to improving air quality, and reducing car journeys despite the positive measures outlined in the policy. New development of any kind may put increased pressure on the current road network, which already suffers from congestion in this area. This would have an associated impact on air quality with NO2 emissions already exceeding the national objective at locations in this

development area, as well as increasing road related noise, having a detrimental impact on health and adding to wider environmental issues.

- The policy is likely to have a negative impact on the objective concerned with reduction of waste, as it is likely that any development will cause an increase in waste, both at construction and operation stage.

7.462 Mitigation

The City Plan must ensure that the city’s employment floorspace requirements can be met, and that the reduction in employment floorspace outlined in this policy is addressed through an increase elsewhere, or through cross-authority working. Met through other policies and Duty to Co-operate.

In addition, new development of all kinds should:

- Consider the impact on adjacent conservation areas and listed buildings. Addressed under CP12 and CP13.
- Ensure that any housing development incorporates provision of open space, in accordance with the standards set out in CP16.
- Maximise opportunities to reduce the need to travel by car and improve air quality.
- Encourage proposals for low-car/car free housing which would be particularly suited to this location. Addressed under CP9.
- Ensure sensitive receptors (in terms of air quality) are located away from the roadside
- Ensure a site specific flood risk assessment is carried out in accordance with the recommendations of the SFRA 2012, to assess the risk of surface water flooding and to ensure surface water flood risk is not increased elsewhere. In addition, sequentially plan development in areas of flood risk. Addressed through CP11.
- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible. Addressed under CP8.
- Incorporate highly efficient water saving technologies. Addressed under CP8.
- Achieve zero carbon status or maximise energy efficiency features. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Should meet high environmental standards. Addressed under CP8.
- Aim to facilitate reduction of waste. Addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18

7.463 Recommended changes to policy

No further recommendations were made.

7.47 DA7 – Toads Hole Valley

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-?	-	+	+?	++	--	+?	+	?		++	++	+	+	+	+	-	+	-	++	+	-

7.471 Conclusion

- As the policy proposes specific amounts of development, including housing and employment floorspace, the policy is likely to have a significant positive impact on the objectives relating to provision of affordable housing, employment and economic development. In particular, the policy requirement that 50% of residential units provided across the scheme is of 3 or more bedroomed properties, should help contribute to meeting the family housing needs of the city.
- The policy should have positive impacts in relation to provision of open space, with the requirement for the scheme to incorporate public open space, children's play facilities and food growing space, as well as improve links to existing provision.
- The policy should have positive impacts on the objective relating to access, as it should result in improved links to the South Downs National Park (SDNP), improved sustainable transport access including pedestrian and cycle links, as well as through the mix of uses delivered through the scheme, which will benefit both new and existing communities.
- Overall, the policy should have a positive impact on health, through delivery of housing and employment opportunities, which are both wider determinants of health, as well as through improved access to services. However there may be adverse impacts for the new community associated with noise or other traffic impacts caused by proximity to the A27.
- The policy may help to reduce deprivation within the Hangleton & Knoll ward, through the provision of services, and through the requirement for training for local communities.
- The policy requires that an exemplar sustainable development is delivered, setting specific standards for building sustainability, as well as considering providing infrastructure, such as district heating, which should have positive impacts on the objectives relating to water and energy consumption, however is not found to be significantly positive due to heat network infrastructure only being a consideration and not a requirement. The requirement for BREEAM Outstanding and Code for Sustainable Homes Level 6 to be met should result in positive significant impacts on the relative objective.
- Although the policy requires development to complement the setting of the SDNP, and should therefore have positive impacts against this objective, the SA still found the impact to be uncertain and recommended that all development proposals would need to undertake an impact assessment on the SDNP.
- Despite some of the positive sustainable transport measures outlined in the policy, the assessment found that the policy had potential for a negative impact on the objectives relating to improving air quality and reducing car journeys due to the amounts of development proposed. In addition, the location of the site, in terms of ease of access to the wider road network may impact on choices around car ownership as well as on mode of travel to/from the area. The delivery of 25,000sqm of office space is likely to result in a considerable amount of journeys made for work to the area, as may the potential for the parking at the employment site to be made suitable for informal park and ride.
- The assessment also found the policy to have potential for negative impacts on the objective relating to adaptation to climate change. Natural habitat plays an important role in absorption of water and in helping to cool the urban

environment and therefore the loss may impact on the city's ability to adapt to climate change.

- Although previously the SA found the policy to have potential for negative impact on the objective relating to pollution of water, the SA notes that the policy now requires sensitive groundwater zones to be protected and flood risk to be reduced, and is therefore now found to be more positive, however still uncertain.
- The policy is likely to have a negative impact on the objective concerned with reduction of waste, as it is likely that any development will cause an increase in waste, both at construction and operation stage.

7.472 Mitigation

In addition to general mitigation relating to residential or employment based development outlined under CP1 and CP3 also:

- Undertake an ecological survey prior to any development taking place, and incorporate substantial features and habitats to encourage biodiversity back to the site following development, including linking the site to the existing green network . Addressed under CP10.
- Ensure that a thorough impact assessment takes place at various stages to assess the impact of development proposals on the SDNP and its setting. Addressed through policy.
- Ensure that sustainable transport options are provided in time to serve the new development, including provision of a new bus-route or extension to an existing bus-route to link provision on the urban fringe with the rest of the and beyond to the Downs city. Addressed through policy and CP9.
- Incorporate substantial sustainable drainage systems (SUDS) on site and permeable surfacing where appropriate to reduce the risk of surface water run-off and pollution to groundwater as a result of development and ensure run-off rates are maintained at Greenfield level. Addressed through CP8, CP11 and SA4. Also, see recommendation.
- Ensure that HIA considers the impacts of development in this location on the health of existing communities, as well as the impacts on the future communities. Addressed through CP18.

7.473 Recommended changes to policy:

Add the following bullet points to the supporting text (paragraph 3.77):

- Ensure surface water run-off is controlled to maintain Greenfield run-off rates
- On and off site tree-planting to help reduce the impact of urban heat island effect

7.48 DA8 – Shoreham Harbour

Brighton & Hove City Council is currently working with Adur District Council and West Sussex County Council on proposals to produce a Shoreham Harbour Joint Area Action Plan. The Joint Area Action Plan (JAAP) will be the planning document which provides the framework and guidelines for developers and will clarify the area of land which could be considered for regeneration, as well as what kind of development would be acceptable in the area. The Brighton & Hove City Plan and Adur Local Plan both also contain a policy on Shoreham Harbour as they are the overarching planning documents for the area.

The Shoreham Harbour policy contained within the City Plan only applies to the area that falls within Brighton & Hove.

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-?	-	+	?	++	-	-/+	-	+	--	++	++	-/+	+	+	+	++	+	--	-	+	-

7.481 Conclusion

- The policy is likely to have a significant positive impact in the medium to long term on the objectives relating to provision of housing, employment and economic development with the regeneration of the harbour and surrounding area the key aim of the policy. The policy should result in delivery of a mix of housing, new employment floorspace for a range of uses, protection of port-uses and intensification of existing vacant or under-used space, potentially increasing the output of the port.
- The policy is likely to have a positive impact on objectives relating to maintaining local distinctiveness through improvements to the surrounding public realm and townscape; and should bring about improvements in accessibility through improved linkages with surrounding areas, including the Boundary Road District Centre, local beaches and local Public Rights of Way.
- The policy is also likely to result in remediation of contaminated land and result in better use of previously developed land.
- The policy should also have positive outcomes on the objective relating to energy use, through the requirement which encourages development to consider low and zero carbon decentralised energy networks.
- The assessment found the policy to have potential for significant negative impact on the objectives relating to coastal flood risk and adapting to climate change. Parts of the development area are located in areas at risk of surface water flooding, are located in flood zones 3a and 3b in relation to tidal flooding, with the risk and extent of tidal flooding anticipated to increase as a result of climate change.
- The assessment found the policy had potential for an overall negative impact on the objectives relating to improving air quality and reducing car journeys. New housing and employment-based development, as well as increased output of port-based activities may result in an increase in journeys made and HGV movements to and from the area. However, the SA supports the priority to improve access to the North Quayside Area, subject to the findings of a localised Transport Assessment, as this may bring about localised improvements to air quality elsewhere within the area.
- The impacts on the objectives relating to health are mixed, as although the policy should bring about health benefits, such as access to employment, housing and open space, the potential for air quality to worsen overall due to an increase in traffic movements could have an adverse impact on health.

7.482 Considerations for the Joint Area Action Plan:

- To investigate the potential for ecological impacts from the proposed reclamation within the Canal area.

- To ensure that development takes into account the area's importance for passage birds, wintering birds and breeding birds. Addressed under CP10.
- To ensure the protection of the coastal vegetated shingle located in the area. Addressed under CP10.
- Sensitive receptors (in terms of air quality) should be located away from the roadside and new streetscapes should be designed to avoid the canyon effect. Addressed under CP8, CP13 and CP18.
- To set out how sustainable transport will be delivered and ensure delivery of a proportion of car-free or low-car residential units supported by car-clubs. Addressed under CP9.
- To investigate the impact that this number of residential units will have on surrounding streets, particularly in relation to localised parking. Addressed under CP9 and CP18.
- To carry out transport modelling to ascertain the impacts of the development of new access to the port.
- A high quality and coordinated approach to urban design should be implemented to ensure the development has a coherent urban form, as well as complement and build upon features located in adjacent neighbourhoods and areas. Addressed under CP12 and CP13.
- The impact of tall buildings should be assessed on key buildings, sites and views, including views from the Downs. Addressed under CP12.
- Links to existing areas of open space, including the beach, should be maximised as should links to the Downs. Addressed under CP9.
- Some areas of on site open space should be provided within the development, and should be able to meet a range of needs. Addressed under CP16 and CP17.
- Significant improvements to all types of off site open space in the vicinity should be made, including improved linkages and access to those sites. Addressed under CP16.
- The use of the beach as an area of open space should be maximised as should the harbour for water-based recreation uses. Addressed under CP16.
- Steps should be taken to reduce the consequence of surface water flooding, i.e. sequentially plan a development so resilient uses are placed on the ground floor. Addressed under CP11.
- New and refurbished development should incorporate highest water efficiency technologies and include rainwater harvesting and grey water recycling wherever possible to ensure water consumption is minimised. Addressed under CP8.
- To incorporate SUDS in all development to reduce the risk of surface water flooding, maximising opportunities for natural SUDS such as green roofs and bio-retention ponds, which would help to bring about a more natural form to the area. Addressed under CP8 and CP11.
- All development proposals should carry out a site specific flood risk assessment and should consider the risks and effects of wave over-topping when applying the sequential and exception approach to development. Addressed under CP11.
- Improvements to flood defences should consider the increased risk of coastal flooding associated with climate change. Addressed under CP11.
- To encourage refurbishment of existing buildings to include improvements in energy efficiency. Addressed under CP3.

- To set requirements for development in relation to meeting specific standards (e.g. BREEAM / CSH).
- To aim to facilitate reduction of waste, both at construction and operation stage.
- To ensure that training and employment opportunities are provided for local people. (Addressed through CP2 and CP7).

7.483 Recommended changes to policy:

No further recommendations were made.

7.5 Special Area policies

7.51 SA1 – The Seafront

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-/+	-/+	++	+	++	-/+	+	-	?	+	+	+	++	+	+		+	+	+	-	+	-

7.511 Conclusion

- The assessment found the effect to be significantly positive on the objectives concerned with maintaining local distinctiveness, through preservation of the historic and natural landscape value of the seafront and adjoining historic built environment, and improving health, through recognition of the seafront as an important piece of open space and opportunities for activity it provides.
- The King Alfred Strategic Allocation was also found to have significant positive impacts on health through the replacement of indoor and outdoor sports facilities, as does the remainder of the policy through the opportunities for informal leisure provided along the seafront, and on housing, with the potential to deliver 400 dwellings.
- The effect should also be positive on the objectives concerned with improving employment and economic development, improving community safety and increasing accessibility, and the SA notes that the amended policy now requires that no adverse impacts on the setting of the SDNP arise to the east of the Marina, having positive impacts on objective 4.
- The policy makes reference to the changing climate and the impact this can have on existing coastal defences. Any development situated along the seafront may be at increased risk from tidal flooding and that the strategic allocation at the King Alfred specifically requires appropriate flood protection.
- The policy now includes a reference which requires developments to consider low and zero carbon decentralised energy infrastructure, such as heat network systems, and this is considered to bring about positive impacts against the objective for sustainable energy generation, although will depend on implementation.
- As the policy also encompasses proposals for development, including the King Alfred Strategic Allocation, the assessment found there to be potential for mixed negative and positives impact on the objective concerned with biodiversity, as new development has the potential to have an adverse impact on existing biodiversity located along the seafront, some of which is listed as a habitat of International Conservation Importance (coastal vegetated shingle). However the SA recognised the numerous positive references to enhancing biodiversity and conserving coastal habitats within the policy.
- Development also has the potential to increase the number of journeys made along the seafront, and the King Alfred Strategic Allocation in particular could increase local car ownership due to the number of residential units and impact on air quality, with NO₂ levels currently modelled as exceeding the annual air quality objective at the Hove Street/Kingsway location. However, the SA notes that the policy contains numerous references and measures to improving and

promoting various forms of sustainable transport infrastructure, with a main priority of the policy to achieve a modal shift and reduce the impact of traffic, resulting in mixed positive and negative impacts against the relative objectives.

- The policy scored negatively against the objective concerned with waste. Improvements to the seafront may lead to increase in usage and increase in waste produced by seafront enterprises and development could cause an increase in waste at construction and demolition stage. It is however noted that the policy now refers to provision of waste disposal facilities for residents and visitors along the seafront, in addition to other public facilities.

7.512 Mitigation

Development along the seafront, including the King Alfred Strategic Allocation, should:

- Ensure the protection of existing biodiversity, particularly biodiversity or habitats which are locally or nationally designated. Addressed under CP10 and policy itself.
- Be served by public transport and ensure sustainable access serves the development. Addressed by policy itself and CP9.
- Ensure that sensitive receptors are located away from the roadside to minimise impact from air quality in relation to housing provided at the King Alfred site. Addressed by CP8.
- Incorporate low car or car-free housing in relation to housing provided at the King Alfred site. Addressed by CP9.
- Incorporate features to minimise consumption of water. Addressed under CP8.
- Ensure that risk of coastal flooding is addressed. Addressed by policy itself and under CP11.
- Incorporate features and technology to minimise energy consumption. Addressed under CP8.
- Meet high environmental standards. Addressed under CP8.

7.513 Recommended changes to policy

No further recommendations.

7.52 SA2 – Central Brighton

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+?	-/+	++		+	-	-	-			++	++	-/+	+				++	-	-	+	-

7.521 Conclusion

- The assessment found the effect to be directly and significantly positive on the objectives concerned with employment and economic development with the main objective of the policy to reinforce the city's role as a regional centre for shopping, tourism, cultural and commercial facilities. The policy should support the local economy and the employment opportunities it provides through improving the physical environment, providing a focus for new retail

development, supporting retailers, protecting existing B1a office accommodation and creative industry workspace.

- The assessment also found the effects to be directly and significantly positive on maintaining local distinctiveness with the policy seeking to protect historic buildings and recognising the distinct roles of different areas of the city centre.
- The assessment also found the effects to be significantly positive in the long term on sustainable energy generation through the new requirement that expects development to incorporate low and zero carbon decentralised energy infrastructure, such as heat network infrastructure.
- In addition, there should be direct positive impacts on other objectives including improving community safety through the encouragement of a range of evening economy users and age-groups; and increasing accessibility to services, through improvements to the urban realm.
- The SA notes that the amended policy now allows for residential development as part of a mixed use scheme, which will have a positive impact against the objective for housing.
- It is recognised that the policy includes a priority to reduce congestion and promote pedestrian and cycle activity which could help maintain and may improve air quality. However, there is the potential for traffic to increase as a result of increased activity in the area or increased retail or other commercial floorspace, having an associated negative impact on air quality, and also impacting on health.
- The policy is mainly concerned with protection and improvement of existing assets and accommodation of various types. However the policy does also support new development, including retail development resulting in an indirect negative impact on some objectives. This includes the potential for: water consumption to increase and the increased risk of pollution to water and surface water flood risk and the potential for buildings to be unable to adapt to a changing climate.

7.522 Mitigation

Any new development / refurbishment within the area should:

- Incorporate features that enhance biodiversity. Addressed under CP8 and CP10.
- Seek to minimise journeys made by car through implementation of strong parking controls and promotion of sustainable transport. Addressed by CP9.
- Carry out a site based flood risk assessment where flood risk from surface water has been identified in the SFRA. Addressed by CP11.
- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible. Addressed under CP8.
- Incorporate highly efficient water saving technologies and aspire to water neutrality. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet BREEAM or equivalent standards. Addressed under CP8.
- Seek to reduce waste. Addressed under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18

7.523 Recommended changes to policy

There were no further recommendations.

7.53 SA3 – Valley Gardens

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
++	++	++			++	+	-			+	+	++	++	+	++	+	++	+	-	++	-

7.531 Conclusion

- The assessment found the effect to be significantly positive in the long term on a range of objectives including protecting and enhancing biodiversity, through tree planting, landscaping and creation of useable green space; maintaining local distinctiveness through enhancements to historic buildings, improvements to public realm and through enhancing the role of Valley Gardens as a public park, improving air quality and reducing traffic through transport and public realm improvements and increasing accessibility through reduced severance impact of traffic, and improved links and crossing points between this and other areas.
- In addition, the assessment found the effect to be significantly positive against objectives relating to health, health & safety and engaging local communities.
- The policy should also have a positive impact on a number of other objectives including minimising the risk of water pollution, increasing employment and economic activity, and making the most of previously developed land.
- The new policy requirement that encourages development to consider provision of low and zero carbon decentralised energy infrastructure has positive impacts against the sustainable energy objective.
- Although not an overall aim, as the policy is also associated with new/re-development there are a number of objectives upon which the policy could have an indirect negative impact. This includes the potential for: water consumption to increase and the potential for buildings to be unsuitable to a changing climate. These should be mitigated through other policies in the Plan.

7.532 Mitigation

Any new development in the area should:

- Incorporate highly efficient water saving technologies and aspire to water neutrality. Addressed under CP8.
- Incorporate measures to save energy and incorporate low/zero technology. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet BREEAM / Code for Sustainable Homes or equivalent standards. Addressed under CP8.
- Seek to reduce waste. Addressed under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18

7.533 Recommended changes to policy

There are no recommendations.

7.54 SA4 – Urban Fringe

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	+	+	++		+	++				+	+	+				+	+	+		+	

7.541 Conclusion

- The policy was found to have significant positive impacts on the objectives relating to the protection of the South Downs and preventing water pollution. Protecting the wider landscape role of the urban fringe and the setting of the SDNP, and protecting groundwater source protection zones are both key objectives of the policy.
- The policy was also found to have positive or potential for positive impacts on the objectives relating to biodiversity, with the policy promoting the urban fringe as part of the green network; improving air quality and reducing car journeys, with the policy promoting sustainable access to the countryside; employment and economic development, with specific references to creating gateway facilities to support sustainable tourism; health, with reference to local food production as well as through the wider health benefits access to the urban fringe can provide; sustainable energy, through potential for sites for renewable energy; and increasing access.
- Although the objectives of the policy should ensure the protection of the urban fringe, the SA recognises that SA4 is a developmental policy which supports the use and management of land within the urban fringe, and permits development in an urban fringe location when it meets certain criteria. However as the policy seeks to ensure any adverse impacts are minimised, and that proposals meet the policy objectives, the risk for negative impacts associated with development should be reduced and on balance the policy is considered to be positive.

7.542 Mitigation

The policy is explicit in stating that development on the urban fringe will only be permitted where all the adverse impacts are minimised and appropriately compensated for. Therefore no further mitigation is suggested.

7.543 Recommended changes to policy

There are no recommendations.

7.6 Citywide policies

7.61 CP1 – Housing Delivery

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-	-	-	-	++	-	-	-	-	-	+	+	++	+	+	+	+	+	-	-	+	-

Nb. The site specific details of housing delivered within Development Areas have been assessed in more detail under DA policies.

7.611 Conclusion

- The assessment found that the policy would have a significant positive effect on the objectives concerned with provision of affordable housing and housing generally as would be expected. The SA notes that the amount of housing proposed is a minimum, and although is less than the amount assessed as required (GL Hearn, Housing Needs Assessment, 2012), the SA considers this amount to be balanced with what can be accommodated given the constraints of the city and to be reflective of the option assessed and found to be the most sustainable at Policy Options Paper Stage (October 2011).
- The assessment also found the policy to have positive impacts on objectives relating to health and deprivation, with access to housing one of the wider determinants of health and affordability of housing one of the measures of multiple deprivation, as well as on employment and economic development, due to the potential for construction-based jobs and evident links between housing and economic growth.
- The assessment found that housing located anywhere in the city has potential to have a negative impact on a number of the objectives, including those relating to: biodiversity, air quality, open space, reducing car journeys, water pollution, water consumption, energy consumption, adaptability to climate change and reduction of waste. With site specific objectives, e.g. biodiversity, the significance of these impacts will depend on the site developed.

7.612 Mitigation

The City Plan must ensure that the city's housing requirements can be met, through cross-authority working.

All housing, whether on previously developed land or Greenfield land should:

- Incorporate features to benefit biodiversity. Addressed under CP8 and CP10.
- Seek the maximum reasonable amount of affordable housing. Addressed under CP20.
- Incorporate features to reduce car ownership, e. g. a number of car-free units, provision of car-club membership, increased number of car-club vehicles. Addressed under CP14 and CP9.
- Be in regard to the local characteristics of the surrounding neighbourhood and should consider the setting of the historic, built and natural environment. Addressed under CP12, CP13, CP5 and SA5.

- Incorporate provision of open space to accommodate the needs of the future population. Addressed under CP16.
- Incorporate SUDS to minimise the risk of surface water flooding and pollution to groundwater. Addressed under CP8 and SA4.
- Meet required standards of SPD08 Sustainable Building Design and CP8, particularly in terms of water and energy consumption.
- Provide construction job opportunities for local people, particularly where sites are situated within or near to areas of deprivation. Addressed under CP2, SA6 and Development Area policies.
- Incorporate features to help adaptation to climate change. Addressed under CP8.
- Ensure construction and demolition waste is minimised and that appropriate waste management features are maximised in development. Addressed through CP8 and national policy.
- Sites for housing should be balanced with the other wider needs of the city (e.g. employment, health and community needs. This will be addressed in Part 2 of the City Plan.

7.613 Recommended changes to policy

No further changes to the policy are suggested.

7.62 CP3 Employment Land

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-/+ ?	-	-/+	-?	+	-/+	-	-/+	++?	-	++ ?	++ ?	+	+	+		+	+	-	-	+	-

7.621 Conclusion

- The assessment found the policy to have potential for significant positive impact on the objectives concerned with employment and economic development, as would be expected, through the protection of existing sites and provision of new employment floorspace. The naming of industrial estates and premises which will be safeguarded is considered to provide certainty and the naming of sites where mixed use will be accepted may help to bring forward development on under-utilised sites.
- However, this positive impact was also considered to be uncertain, as the amount of additional employment floorspace to be delivered is lower than the amount assessed as required. The SA notes the new policy priority to allocate additional employment sites through Part 2 of the City Plan, which should ensure sufficient employment land is provided to ensure job growth and an unconstrained economy.
- In addition, the policy is likely to have a positive impact on increasing access to services, through increased access to employment; on health, with employment opportunities one of the wider determinants of health; reducing deprivation through the potential to increase employment opportunities in areas that suffer from employment deprivation, and making more efficient use of previously

developed land, with the policy allowing redevelopment at existing sites that will increase productivity.

- Although there may be a conflict between the provision of land for employment uses and land for housing, the SA found the policy to have potential for a positive impact on the provision of affordable housing as the policy allows mixed use developments at some sites, and also allows the release of redundant employment or other sites to alternative uses, including affordable housing.
- The policy goes some way to reducing the need to travel by car, through the promotion of mixed use developments on appropriate sites, and through the location of employment-based development within Development Areas, the majority of which have good sustainable transport links. In addition, an increase in employment-land within the city may provide opportunities to reduce out-commuting. However, new employment-based development may lead to an increase in journeys to/from that site, increasing the risk of congestion as well as having an associated adverse impact on local air quality.
- In addition, as the policy is concerned with new development, the policy has potential to have a negative impact on a number of objectives, including those relating to: biodiversity, open space and local sites of importance, water pollution, water consumption, energy consumption, adaptability to climate change and reduction of waste. However, the SA recognises the support for proposals to refurbish existing office and industrial sites may bring about positive benefits for some of these objectives.

7.622 Mitigation

Ensure allocation of additional employment sites in the City Plan Part 2 to meet the identified need. In addition, new employment-based development should:

- Incorporate features that enhance biodiversity. Addressed under CP8 and CP10.
- Be of high quality design. Addressed under CP12.
- Ensure that any adverse impacts on the setting of the SDNP are avoided through appropriate design. (See DA7 and SA5).
- Be located / serviced with good sustainable transport links to reduce air pollution and encourage sustainable travel. Addressed under CP9 and DA policies.
- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible. Addressed under CP8.
- Incorporate highly efficient water saving technologies and aspire to water neutrality. Addressed under CP8.
- Incorporate measures to reduce consumption of energy and incorporate low/zero carbon technology. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet BREEAM or equivalent standards. Addressed under CP8.
- Seek to reduce waste. Addressed under CP8 for operation stage and national and local policy for construction stage.
- Seek to reduce adverse health impacts associated with new development to maximise positive health benefits. Addressed under CP18.

7.623 Recommendations for changes to policy

There were no recommendations for change.

7.63 CP6 – Hotel & Guest House Accommodation

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
-	+	+	+	+?	+	-	-			++	++					+	+	-	-		-

7.631 Conclusion

- The SA recognises the economic benefits that the visitor-based economy brings to the city and the assessment found the impact to be directly and significantly positive on the objectives concerned with employment and economic development.
- The policy enables new accommodation to be built, however the requirement for an impact assessment should prevent any adverse impacts on existing accommodation providers, which is considered to be of particular benefit during current economic conditions.
- In addition, the policy is flexible and allows for change of use within the hotel core zone where redundancy can be proven. The tests for redundancy are considered to be strong enough to avoid un-necessary changes of use and are not considered to impact negatively against the employment and economic development objectives. In addition, this flexibility is considered to bring about positive benefits for the local economy by allowing changes to take place to reflect the current market.
- The policy also makes the commitment to create local jobs, which will also be of benefit to the local economy and employment.
- The promotion of the Hotel Core Zone, whereby new hotel accommodation will be directed to central Brighton first, should have indirect positive impacts on the objectives relating to reducing transport and improving air quality, as new hotel accommodation will be located within good access to modes of sustainable transport as well as being located close to visitor attractions.
- In addition, the policy should also have a positive impact on maintaining local distinctiveness through implementation of the core zone which should protect surrounding conservation areas and due to the requirement for any change of use to be compatible with the character of the local area.
- As the policy now allows a change of use, including to residential, where redundancy can be proven, the policy may also have positive impacts on housing, although this is considered to be uncertain.
- As the policy allows for new development, there are a number of objectives upon which the policy could have an indirect negative impact, including the potential to: harm existing biodiversity, increase water pollution, increase water consumption, increase energy consumption, be unable to adapt to a changing climate and increase waste.

7.632 Mitigation

New hotel development should:

- Incorporate features that enhance biodiversity. Addressed under CP8 and CP10.

- Incorporate appropriate Sustainable Drainage Systems, maximising potential to incorporate biodiversity-based SUDS where possible. Addressed under CP8.
- Incorporate highly efficient water saving technologies and aspire to water neutrality. Addressed under CP8.
- Incorporate measures to save energy and incorporate low/zero technology. Addressed under CP8.
- Be adaptable to the changing climate. Addressed under CP8.
- Meet BREEAM or equivalent standards. Addressed under CP8.
- Seek to reduce waste. Addressed under CP8 for operation stage and national and local policy for construction stage.
- Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18.

7.633 Recommendations

No changes to the policy were suggested.

7.64 CP8 – Sustainable Buildings

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
++	+			-	+	+	++					++		+		+	++	+	++		+

7.641 Conclusion

- In the long term, the policy is likely to have significant positive impacts on objectives concerned with protecting and enhancing biodiversity, minimising water consumption, improving health, reducing energy consumption, and meeting high environmental standards.
- A range of other positive impacts are also anticipated.
- The SA notes that the short term impacts on some objectives have reduced from being significantly positive (++), to positive (+) reflecting the reduction in BREEAM or CSH standards required to be achieved in the period prior to 2016 for residential development and 2019 for non-residential development. However, this is anticipated to increase to be significantly positive in the medium to long term and the policy has numerous other requirements that ensure the policy continues to have positive impacts.
- The SA notes that this is an overarching key policy guiding development, the requirements of which should ensure the avoidance of some of the potential negative impacts associated with other policies that are associated with development.
- The assessment found the potential for negative impact on objective 5, which is concerned with the provision of affordable housing, as the cost of providing highly sustainable buildings may conflict with the cost of providing affordable housing, particularly in the current economic climate. However, the policy does state that financial viability, or other constraints of a scheme will be considered and that mitigation measures may be sought where sustainability standards cannot be met.

7.642 Mitigation and recommendations

No mitigation or changes to the policy are suggested. In relation to housing viability the policy makes reference to considering the viability of a scheme and should therefore not have a negative impact on the provision of affordable housing.

7.65 CP9 – Sustainable Transport

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
?	+	?	?		+	?				+	+	+	+	+	+			?		++	

7.651 Conclusion

- The policy sets out various measures which should reduce the amount of journeys made by car, and other more polluting vehicles in certain locations, having positive impacts on the objectives relating to air quality, reducing car journeys and health.
- The policy should also have a positive impact on the objectives concerned with employment and economic development, through the increase of transport options that facilitate access to and within the city and through reduced congestion which can help support economic growth; should increase accessibility through the variety of measures outlined; and should help to reduce deprivation and social inequalities through improvements to sustainable transport in residential areas in the city.
- The policy proposes the use of existing car parks to be used as a form of park and ride. There has been a range of studies on the environmental and economic impacts of park and ride elsewhere, many of which conclude that although there are benefits in terms of reducing city centre congestion, having benefits for air quality, health and road safety in that location, that it can result in a displacement of these issues to around the site itself, and this would need careful consideration particularly in relation to adjacent communities.
- As the form of park and ride to be delivered is making use of existing car parks, rather than new sites, the significance of adverse impacts on a range of site based objectives is considered to be less than previous iterations of the policy that involved development of entirely new sites. However, any increased capacity at these existing sites may have the potential for adverse impacts, depending on the site, and is therefore considered uncertain on objectives relating to biodiversity, local distinctiveness, the South Downs, water pollution and adapting to climate change.
- The SA welcomes the inclusion of the commitment to establish criteria for car free housing, with this being recommended as a means of mitigation for a number of developmental policies in the City Plan.

7.652 Mitigation

Mitigation may be required to minimise adverse impacts resulting from an increase in capacity at existing car parks to accommodate informal park and ride proposals. However, as the supporting text sets out clear criteria and requires proposals to

minimise adverse impacts to an acceptable level, no additional mitigation is considered necessary.

7.653 Recommendations for changes

No further recommendations.

7.66 CP12 – Urban Design

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
+	+	++	++		+					+	+	+	++	+		++		+	+	++	

7.661 Conclusion

- In the long term, the policy is likely to have significant permanent positive impacts on objectives concerned with maintaining local distinctiveness and protecting key sites with this being a key aim of the policy; protecting the South Downs National Park, with development now required to have regard to impact on the purposes of the National Park; making the best use of previously developed land through direction of tall buildings to appropriate locations; and improving accessibility through inclusive design and direction of tall buildings to areas with good sustainable transport links.
- The policy is also likely to have a range of other less significant indirect positive impacts.

7.662 Mitigation and recommendations

No mitigation or changes to the policy were suggested.

7.67 CP15 – Heritage

Biodiversity	Air quality	Distinctiveness	South Downs	Housing	Car Journeys	Water pollution	Water use	Contamination	Coastal flooding	Employment	Economic Dev.	Health	Comm. Safety	Deprivation	Engagement	Use of PDL	Energy use and generation	Climate Change adaptation	BREEAM/CSH	Accessibility	Waste
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
		++	+							++	++				+			+			

7.671 Conclusion

- The policy is likely to have significant positive impacts on objectives concerned with maintaining local distinctiveness, through conservation and enhancement of the city's historic landscapes, buildings and other sites and their settings. In addition, the policy will ensure that the city's built heritage guides development in historic areas.
- The policy should also lead to significant positive impacts on increasing employment opportunities and increasing economic activity, through recognition of the role culture, heritage and the South Downs play in the visitor economy.

- The policy should also have positive benefits for climate change adaptation, by allowing the public benefit of the proposal to be weighed against any harm which may be caused to a heritage asset, and should provide opportunities for positive public engagement through review of the Conservation Strategy and Local List.

7.672 Mitigation and recommendations

No mitigation or changes to the policy were suggested.

Section 8 Summary of Recommendations

8.1 Introduction

This section provides a summary of the recommended changes that the Sustainability Appraisal has made at this stage. There are few recommendations from this stage and it should be noted that the majority of changes recommended by the SA at the previous stage were implemented. Further details on recommendations made at the last stage can be found in the [Sustainability Appraisal Report, May 2012](#).

Table 8.1 Table to show the reason for the recommendation, the change recommended and the City Plan response.

Policy	SA objective and reason for change	Recommended change	City Plan Response
SS1	<p>There is no indication as to what criteria will be used to determine whether the policies in the Plan are considered to be “out of date” and as such, would trigger implementation of the latter part of the policy.</p> <p>It is noted that the presumption in favour of sustainable development does not apply to locations at risk of flooding and that at these locations the Sequential and Exceptions Tests still apply.</p> <p>It is noted that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined (NPPF s.119) and thus this policy will not be relevant in these situations. Nor does it apply to sites designated as AONB or SSSI (NPPF footnote 9).</p>	<p>It may be helpful to define this in the supporting text.</p> <p>It may be useful to highlight this in the supporting text.</p> <p>It may be useful to highlight this in the supporting text.</p>	<p>Further information not included.</p> <p>Footnote added with more details.</p> <p>Footnote added with more details.</p>
DA7	<p>SA Objective 7 & 19: Sites of natural form perform role in absorption of water, as well as helping maintain temperature. Policy could be strengthened through additional wording in supporting text.</p>	<p>Add to supporting text, following paragraph 3.77:</p> <ul style="list-style-type: none"> • Surface water run-off being controlled to maintain Greenfield run-off rates • On and off site tree- 	<p>Added as suggested</p> <p>Added as</p>

Policy	SA objective and reason for change	Recommended change	City Plan Response
		planting to help reduce the impact of urban heat island effect	suggested

Section 9 Cumulative Impacts

9.1 Cumulative Impacts of Area Policies

9.11 Table 9.1 sets out a summary of the likely impacts of the area based policies on each of the sustainability objectives in the long term. This enables the overall cumulative and synergistic effects of all of the policies upon each of the objectives to be more clearly seen in relation to one another, by looking down the columns, and effects analysed. A written summary of the cumulative impacts is provided in Table 9.2.

Table 9.1

		Sustainability Objectives																					
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
Area Based Policies	DA1	+	-	+			-	+	-	+		++	++	-/+	+	+	+	+	+		-	+	-
	DA2	-/+	--	-/+	+	++	--	-	-	+	--	++	++	-/+	+	+	+	+	+	--	-	++	-
	DA3	+?	-	-/+	+	++	--	-/+	-	+		++	++	-/+	+	+	+	-/+++	+	-/+	++	++	-
	DA4	+	--	-/+		++	--	-	-	+		++	++	-/+	+	+	+	+	++	-	-	++	-
	DA5	+	-	-/+		++	-	-	-	+		++?	++?	-/+	+	+	+	++	++	-/+	-	++	-
	DA6	+	-	+		++	-	+	-	+		++?	++?	-/+	+	+	+	++	+	-/+	-	++	-
	DA7	-?	-	+	+?	++	--	+?	+	?		++	++	+	+	+	+	-	+	-	++	+	-
	DA8	-?	-	+	?	++	-	-/+	-	+	--	++	++	-/+	+	+	+	++	+	--	-	?	-
	SA1	-/+	-/+	++	+	++	-/+	+	-	?	+	+	+	++	+	+		+	+	+	-	+	-
	SA2	+?	-/+	++		+	-	-	-			++	++	-/+	+				++	-	-	+	-
	SA3	++	++	++			++	+	-			+	+	++	++	+	++	+	+	+	-	++	-
	SA4	+	+	+	++		+	++				+	+	+				+	+?	+		+	
	SA5	++	+	++	++		+	++				+	+	+			+	+				+	
	SA6	+	+	+		+	+	-	+	?		+	+	++	+	++	++	+	+	+	+	++	-

9.12 When looking at this table, it is evident that there is potential for cumulative negative impact on some of the objectives. However it is important that the different parts of the Plan are considered as a whole as the policies all work together to ensure high quality development, appropriate infrastructure and mitigation. It is important, and can be seen from Table 9.3, that the Citywide policies have scored positively against the majority of the Sustainability Objectives because these policies will set the context for the development and special area policies and will be used to minimise and mitigate any negative impacts resulting from the plan.

Table 9.2 Summary of cumulative/synergistic impacts of area-based policies

SA Objective	Summary of cumulative / synergistic effects of area based policies
1) Protect and enhance biodiversity	Overall, the impact on biodiversity is mixed and uncertain in some locations. Existing biodiversity could be damaged or displaced by development leading to a reduction in biodiversity, some of which is of local, national and international importance in some places. The cumulative impact of development could result in city wide habitat loss as well as a loss of corridors that enable movement, leading to more isolated habitats/species. However, it is recognised that development can provide the opportunity to enhance biodiversity, or provide links between habitats, particularly in areas that are currently lacking in biodiversity, as is the case with most of the Development Areas, provided that substantial and appropriate features to encourage or enhance biodiversity are incorporated into development.
2) Improve air quality	Overall, there is a risk that the development area policies may lead to a reduction in air quality. Citywide air quality may worsen over time, due to an increase in car journeys associated with an increased population, and due to an increase in other journeys, such as freight and buses, associated with increased economic growth, including employment and tourism-related journeys, even with improvements to emissions technology. The majority of Development Areas tend to be located within the existing AQMA, therefore may exacerbate local problems. A reduction in air quality may increase the number of people exposed to poor air quality and may have health implications, particularly for the young, old or vulnerable.
3) Maintain local distinctiveness	Overall, the policies should lead to the protection of key heritage sites and maintenance of what makes neighbourhoods and the city distinctive. An increase in housing or employment-based development will increase demand for open space in the vicinity and throughout the city, putting increased pressure on existing resources, with some areas already failing to meet open space standards. The cumulative effect of a number of developments without open space provision on site would be to fail to provide for these new demands and would exacerbate any existing deficiencies, resulting in an impact on health and well-being.
4) Protect South Downs	The majority of area-based policies were found to have no direct impact on the South Downs. However it is recognised that some development in some of the Development Areas located in close proximity to the national park boundary could have an impact, and that tall buildings built anywhere in the city could detract from views of or from the Downs.
5) Provide decent, affordable housing	Overall, the policies should result in a considerable amount of housing, a proportion of which will be affordable. Increased affordability of housing increases the opportunity for people to move in to decent housing, therefore having a positive impact on health. In addition, housing in general is one of the wider determinants of health. Provision of housing also directly links to economic growth. The amount of housing to be delivered was found by the SA to be the most sustainable compared to other options, however, it is

SA Objective	Summary of cumulative / synergistic effects of area based policies
	understood that the amount of housing planned for does not meet the identified need (as identified in the Housing Requirements Study 2012), and that the Duty to Cooperate will need to be pursued.
6) Reduce amount of car journeys	Overall, the area-based policies will lead to an increased population and increased employment opportunities, and this may lead to an increase in car ownership and journeys made by car, as well as increase in employment based journeys, including freight. Visitor attractions may also cause an increase in journeys made, some of which are likely to be made by car unless significant investment in sustainable transport options occurs. An increase in journeys made will lead to further congestion, which is already a problem throughout Brighton & Hove, particularly at peak times. The number and type of journeys made is intrinsically linked to air quality and road safety and generates considerable levels of noise, ultimately impacting on the health of residents and visitors. In addition to localised impacts, any increase in traffic will lead to an increase in carbon emissions, thus contributing towards climate change.
7) Minimise risk of pollution to water	Additional development, including housing and employment, will lead to an increase in impermeable surfaces, increasing the risk of surface water flooding and pollution to water resources. Although it is anticipated that the majority of the development located in development areas will be on previously developed land, some of which is urbanised, some of the sites identified in the policies are at risk of surface water flooding, which could increase with further development and have impacts on site and elsewhere. Development on the urban fringe will result in the urbanisation of a currently natural habitat which may play a role in absorption of water and potentially in the recharge of the underlying aquifer.
8) Minimise use of water	The increase in new housing and employment-based development throughout the city will increase pressure on water resources. The South East region was designated as being under significant water stress for some time, which then increased to being designated as in drought status in early 2012. Water levels are now reported as normal, following high levels of rainfall throughout 2012, however the fluctuating status shows how easily the region can go from one classification to another. Although high standards for water consumption are associated with new residential and mixed-use development, existing buildings and premises also need to be encouraged to incorporate water saving technologies if an overall reduction in water consumption is to be achieved.
9) Promote development of contaminated land	Overall, the policies have potential to result in the remediation of contaminated land. The city contains a number of sites that have potential for contamination, due to their historic or current use. Development can disturb contaminants and increases the risk of leaching into groundwater, however also provides the opportunity to remediate contaminated sites, which will have a positive impact on water resources, health and the environment in the long term.
10) Manage coastal defences	Overall the majority of the Development Area and Special Area policies will not have any impact on the coastline or increase the risk to development of coastal flooding. However, development situated along the

SA Objective	Summary of cumulative / synergistic effects of area based policies
	coastline could be at increased risk of coastal flooding and may also have a detrimental impact on the coastal habitat and marine species. Sea-level rise associated with climate change has implications for any development located along the seafront.
11) Employment: balance needs of tourists, residents and businesses	Overall, the policies should result in opportunities for employment creation. The policies should result in an increase of land for employment-uses, including office, retail, and industrial, as well as meeting the needs of various sectors, including the need for affordable managed workspace for the digital and creative industries and start up businesses. The policies should also ensure that training and employment opportunities are provided for local people, particularly those in more deprived residential areas, potentially leading to increased local skills and employment rates. However, it is recognised that although there is likely to be an increase in employment floorspace overall, there are reductions in certain areas which have not been met through an increase elsewhere. In addition, the total amount of employment floorspace to be delivered does not meet the assessed need (Employment Land Study 2012) and therefore would need further allocations in Part 2 of the City Plan, or through the Duty to Cooperate. A lack of the necessary employment floorspace could have adverse impacts on job growth and economic development.
12) Support economic development	Overall, there should be an increase in economic activity through the delivery of employment opportunities and increase in premises for employment as well as through delivery of housing which will be at a level required to support a certain amount of economic growth. In addition, the commitment to provide training and apprenticeships should help to improve local skills, support the move into employment and further support economic growth of the city. As described above, although there is likely to be an increase in employment floorspace overall, there are reductions in certain areas which have not been met through an increase elsewhere. In addition, the total amount of employment floorspace to be delivered does not meet the assessed need (Employment Land Study 2012) and therefore would need further allocations in Part 2 of the City Plan, or through the Duty to Cooperate. A lack of the necessary employment floorspace could have adverse impacts on job growth and economic development.
13) Improve health	The overall impact on health appears to be fairly mixed. The negative results mainly stem from the predicted increase in traffic and congestion and the associated impact this will have on health due to a reduction in air quality, an increase in road related noise and loss of tranquillity, an increase in road-related accidents, as well as the contribution transport makes towards climate change. However, overall, the policies also present opportunities to improve the health and wellbeing of residents, with many of the wider determinants of health being met, such as increased access to housing, employment, leisure and cultural activities, as well as increased access to services and delivery of infrastructure which will have health benefits, including schools, community and health facilities. The requirement to carry out a HIA on all strategic developments should also ensure that any adverse health impacts associated with

SA Objective	Summary of cumulative / synergistic effects of area based policies
	construction or operation are identified and minimised, and that positive gains are achieved.
14) Integrate health and community safety	Overall, the policies should result in an improvement in health and safety, with new and re-development providing the opportunity to design out crime, increase natural surveillance and reduce the fear of crime and with some policies specifically prioritising reducing crime.
15) Narrow the gap between deprived areas and rest of the city	Overall, the policies should result in a reduction in deprivation. In particular, many of the strategic developments within the DA policies should lead to training schemes for local people, particularly targeted at areas facing high levels of unemployment or employment deprivation. The increase in affordable housing should lead to more people being able to move from non-decent standard housing. The Sustainable Neighbourhoods policy, should lead to the development of neighbourhoods where residents' needs can be met locally and focuses on reducing inequalities found between neighbourhoods. In addition, other policy requirements that results in improvements to existing buildings, may help to reduce fuel poverty.
16) Engage local communities	LDF documents need to ensure that local residents and businesses are positively engaged in the future development of the city, to ensure their needs are met. In addition, development throughout the city will also present the opportunity to engage with local communities.
17) Make the best of previously developed land	Overall, the policies should result in the effective use of previously developed land. Many of the sites identified in the area policies are currently either under-utilised or inefficiently used, or are undeveloped brownfield sites, and therefore development of these sites will increase productivity. It is necessary that development should be of an appropriate density to the area, to ensure the character of an area is maintained and to ensure there are adequate services to meet the needs of that population. Development on Greenfield sites associated with the Lewes Road and Toads Hole Valley policies were found to have a negative impact on this objective due to the nature of the objective.
18) Maximise sustainable energy	In the medium to long-term, the combination of government targets for all new residential development to be zero carbon by 2016 and new non-residential to be zero carbon by 2019, and in addition to CP8 and SPD08, should result in an increase in the amount of development that is zero carbon and is using low/zero carbon sources of energy. Energy efficient design and opportunities for district heating, will also have a positive impact on health, through lower bills associated with efficient buildings. However, the positive impact identified in the table above is based on this assumption. Should new development fail to meet these targets, then energy consumption will increase leading to an increase in carbon emissions and contributing towards climate change, as well as increasing the city's Ecological Footprint.
19) Taking account of the	Inefficient development, in terms of energy and resources, will contribute towards climate change through increased emissions. Badly designed development may be unsustainable and have a short lifespan if not

SA Objective	Summary of cumulative / synergistic effects of area based policies
changing climate	<p>designed to cope with the consequences of climate change, for instance, higher sea levels, increased temperature and more intense periods of precipitation.</p> <p>The cumulative impact of development will be an increase in the urbanised area of the city and a potential decrease in natural open space, leaving the city more susceptible to surface water flooding which may be more frequent as a result of climate change, which also increases the risk of pollution to the groundwater resource. The risk of surface water flooding will increase with predicted climate changes, such as heavier winter rainfall. In addition, increased development within the city may cause an increase in the local temperature, which will be exacerbated by the increased temperatures associated with climate change.</p>
20) Meet BREEAM / Code for Sustainable Homes	<p>There is a risk that development delivered could fail to meet high standards and there are few requirements for strategic developments to meet standards in specific policies. The achievement of high standards will be necessary to ensure new development does not contribute towards climate change, as well as ensuring the protection of resources, such as water, the reduction of waste, the prevention of pollution and should bring about other benefits, including benefits for those living/working in the building. It is recognised that the requirements in CP8 should ensure high standards are achieved.</p>
21) Increasing accessibility	<p>The majority of the policies should lead to an increase in accessibility, with all development areas having good existing links to public transport and some policies seeking to increase accessibility through sustainable means, e.g. improvements to pedestrian and cycle routes and improvements to transport interchanges.</p>
22) Reduction of waste	<p>The amount of development proposed will lead to an increase of waste, both during construction and operation stage. The requirement for certain developments to meet high environmental standards, as well as local and national policy on waste reduction, should ensure this is minimised as far as possible, however an increase in population will lead to an increase in waste produced throughout the city.</p>

9.2 Cumulative Impacts of Citywide Policies

9.21 Table 9.3 sets out a summary of the likely impacts of the citywide policies on each of the sustainability objectives in the long term. This enables the overall cumulative and synergistic effects to be more clearly seen in relation to one another, and the effects analysed. A written summary of the cumulative impacts is summarised in table 9.4.

Table 9.3

		Sustainability Objectives																						
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
Citywide Policy	CP1	--	--	-	--	++	--	--	-		-	+	+	++	+	+	+	+	+	-	-	+	-	
	CP2		-				-					++	++	+		+			+	+		+		
	CP3	-/+?	-	-/+	-?	+	-/+	-	-/+	+	-	++?	++?	+	+	+		+	+	-	-	+	-	
	CP4	-	-	+		-	-	-	-			++	++	+		+			+	-	-	++	-	
	CP5		-/+	+	+		-/+		+			++	++						+	+	+	+	-	
	CP6	-	+	+	+	+	+	-	-			++	++						+	+	-	-	-	
	CP7	+	+	+	+	+	+	+	+		+	+	+	++	+	++			+	+			+	
	CP8	++	+			-	+	+	++					++		+			+	++	+	++		+
	CP9	?	+	?	?		+	?				+	+	+	+	+	+				?		++	
	CP10	++	+	+	++			++			+			+					+		++			
	CP11	-/+		+				++			++	+	+	+	+						++		+	
	CP12	+	+	++	++		+					+	+	+	++	+			++		+	+	++	
	CP13	++	++	++			++					+	+	++	+	+	+	+	+		+		++	+
	CP14	+	-	-/+	+	++	-	-	-		+	+	+	++	+	+			++	+	-	-	+	-
	CP15			++	+				+			++	++					+			+			
	CP16	++	+	++	++	-	+	++			+	+		++	+	+					++		++	
	CP17	-	+	+		-	+	-	-			+		++	+	++	+	+	+	+	-	-	+	-
	CP18	+	+	+			+							++	+	++	+						++	
	CP19					++						+	+	++		+			+					
	CP20	-	-	-		++	-	-	-		-	+	+	++	+	+	+	+	+	+	-	-	+	-
	CP21	+	-/+	++	-/+?	++	-/+	+	-	+	+	+	+	+	+	+	+	+	+	+	-	+	+	-
	CP22	+		+	+	+		+						++	+		+			+			++	

Table 9.4 Cumulative impacts of citywide policies

SA Objective	Summary of cumulative / synergistic effects of citywide policies
1) Protect and enhance biodiversity	<p>Overall, the cumulative impact of the policies should be the enhancement of biodiversity. However, the developmental policies, in particular, CP1, CP3, CP4, CP5, CP6 and CP20, and all have potential to harm existing biodiversity, however also present opportunities to enhance biodiversity and will depend on the site developed.</p> <p>CP10 is the cross-cutting policy that should ensure the protection and enhancement of biodiversity.</p>
2) Improve air quality	<p>Overall the impacts are considered to be mixed. Some policies should lead to an improvement in air quality, however, the developmental policies, in particular, CP1, CP3, CP4, CP5, CP14 and CP20 all have potential to reduce air quality through the increase in journeys made associated with an increased population, increased employment opportunities and increased number of visitors to the city.</p> <p>CP9 is the cross-cutting policy that should seek to improve air quality through promotion and enhancement of sustainable transport.</p>
3) Maintain local distinctiveness and sites	<p>The cumulative impact of most of the policies should be that key local sites, including open space and historic buildings, and the character of neighbourhoods is maintained and protected. However, the developmental policies, in particular CP1, CP3, CP14, and CP20 and all have potential to detract from the character of an area or building and are likely to result in an increase in the need for open space, lead to increased pressure on existing areas of open space, or result in development of existing areas of open space.</p> <p>CP16 is the cross cutting policy that should seek to secure the amount of open space required by an increasing population as well as protect and enhance existing open space; CP12/13 should ensure that the design is appropriate to an area and that good quality design is implemented; and CP15 should ensure that sites of historic importance are protected.</p>
4) Protect South Downs	<p>The cumulative impact of most of the policies is that the South Downs will be protected. However delivery of CP1 which includes the development of Toads Hole Valley for housing and employment, could have a negative impact on the setting of the Downs, as could high density development within the city. Policies SA4 and SA5 should ensure the protection of the National Park and its setting.</p>
5) Provide decent, affordable housing	<p>The housing policies and also the employment policy should result in a positive impact and delivery of housing, some of which will be affordable. Some of the other policies (CP3, CP4, CP16, CP17) and may conflict with the provision of housing, due to limited land availability in the city for other developments and other needs. The SA notes that the target level of housing to be delivered is lower than the amount as assessed as required, however that the target is the most sustainable compared to other options, given the constraints of the city.</p>

SA Objective	Summary of cumulative / synergistic effects of citywide policies
	CP1, CP19 and CP20 and the City Plan Part Two should ensure that the necessary and appropriate amount and type of housing to meet the predicted future population is delivered. In addition, the Duty to Cooperate may be required to help meet local housing need.
6) Reduce amount of car journeys	As would be expected, the development policies, including CP1, CP3, CP4, CP5, CP20 and potentially CP15 are likely to lead to an increase in journeys either made by car or other means, or car ownership in the city. CP9 is the cross-cutting policy that should seeks to promote more sustainable forms or transport.
7) Minimise risk of pollution to water	The risk of surface water flooding and pollution to groundwater could be increased as a result of the development policies, in particular CP1 which could result in loss of Greenfield land, but also the other developmental policies. CP8 and CP11 are the cross-cutting policies that should help to ensure the risk of surface water flooding and pollution to groundwater is minimised, either through protection of biodiversity or through incorporation of SUDS. In addition, SA4 should ensure the protection of the groundwater resource and CP11 should ensure that surface water flood risk is assessed.
8) Minimise use of water	The policies are likely to lead to an increase in consumption of water, particularly the developmental policies. CP8 is the cross-cutting policy which should ensure that water consumption is minimised as far as possible, through the requirement to meet various environmental standards and the aspiration for water neutrality. However any significant increase in population will lead to an increase in water consumption which will be a significant problem locally due to fluctuating water levels and periods of recent water stress.
9) Promote development of contaminated land	Most of the policies were found to have no impact on the re-development of contaminated land. As some sites are identified in the employment land and student housing policies, the impacts of these policies were found to offer more potential for positive impact.
10) Manage coastal defences	The majority of the policies were found to have no impact on this objective. However, some of the development policies could increase the risk of coastal flooding, due to the location of development. CP11 is the cross-cutting policy relating to flood risk, which should ensure that the risk of coastal flooding is assessed.
11) Employment: balance needs of tourists, residents and businesses	The policies should lead to an increase in employment opportunities. In particular, the development policies provide homes and employment opportunities, as well as ensuring the protection of land that is already in employment purposes. Protection of the historic as well as natural environment will ensure that visitors continue to be attracted to the city, also having employment and economic benefits. An improved sustainable transport system should help ensure that the employment and economic needs of businesses continue to be met.

SA Objective	Summary of cumulative / synergistic effects of citywide policies
12) Support economic development	As described above, the policies should lead to an increase in economic activity, through increased employment opportunities arising from development, through the increase in floorspace for employment uses throughout the city, and from the protection of existing employment sites. An increase in employment opportunities should also potentially help to reduce the out-commuting for employment purposes that currently occurs, having wider environmental benefits.
13) Improve health	Overall, the cumulative impact of all the policies should be an improvement in health. The policies should result in delivery of housing, training opportunities and employment opportunities, all of which are wider determinants of health. Protection of biodiversity and open space provision will have physical and mental health benefits, as will the provision of sports and recreation facilities. An improved urban environment, as well as protected historic environment can also have health benefits through improved sense of well-being. Increased or improved access to services will help reduce the risk of social exclusion and health inequalities should be reduced. The achievement of modal shift and reduced need to travel by car should result in improved air quality, reduced traffic noise and reduced risk of road traffic accidents, all having a positive impact on health. The construction stage of development will have potential to have negative health impacts on surrounding communities, however the requirements of CP18 to carry out HIA on strategic developments, will ensure this risk is minimised and that positive gains are achieved.
14) Integrate health and community safety	Overall, the policies should result in an improvement in health and safety, with new and re-development providing the opportunity to design out crime, increase natural surveillance and reduce the fear of crime. CP12 in particular requires new development to incorporate features that design out crime.
15) Narrow the gap between deprived areas and rest of the city	Overall, the policies should lead to a reduction in deprivation, through provision of affordable housing, training and employment opportunities and improvements in local environment.
16) Engage local communities	LDF documents need to ensure that local residents and businesses are positively engaged in the future development of the city, to ensure their needs are met. The production of the LDF offers the opportunity for positive engagement as will delivery of a range of development across the city.
17) Make the best of previously developed land	Overall, the policies should lead to the re-development of previously developed land that is located within the boundaries of the built up area. The only exception to this is CP1, which sets out delivery of housing on the Toads Hole Valley site, however it is recognised that this constitutes a very small proportion of the total housing development to be delivered across the city.

SA Objective	Summary of cumulative / synergistic effects of citywide policies
18) Maximise sustainable energy	In the medium to long-term, the policies should result in opportunities to maximise sustainable energy use, due to government requirements for new homes to be zero carbon by 2016 and non-residential buildings to be zero carbon by 2019. The requirements of CP8 should also ensure energy use is minimised, both through design and energy efficient technology and through the requirement for zero carbon status to be achieved and requirement for decentralised energy infrastructure.
19) Taking account of the changing climate	The developmental policies could result in buildings that are not adaptable to the changing climate, either through materials, location or design, or could result in an increase of urbanised surfaces that reduce our ability to adapt to the conditions of climate change, such as increased periods of intense rainfall, and increased local temperature. However policies CP8 and CP11 should ensure development takes account of and is adaptable to a changing climate.
20) Meet BREEAM / Code for Sustainable Homes	None of the developmental policies include specific requirements to obtain high environmental standards, however cross cutting policy CP8 should ensure that high environmental standards are achieved in new build.
21) Increasing accessibility	The policies should lead to an improvement and increase in accessibility to a variety of services and facilities through direction of development to locations that are served by good public transport and through some of the measures outlined in CP9, as well as through protection of local, district and town centres. In addition, SA6 seeks to ensure that residents' needs can be met within the neighbourhoods they live.
22) Reduction of waste	Overall, the policies are likely to lead to an increase in waste production, mainly resulting from an increased population, but also resulting from construction stage of development. The requirements of CP8 should help to minimise waste and facilitate recycling, and the requirements of national and local policy should reduce the amount of waste produced at construction stage.

9.3 Summary of Significant Cumulative Impacts

9.31 Significant Negative Impacts

- 9.311 Although there is the potential for a range of negative impacts, the most significant effects arising from the City Plan are those arising from delivery of housing and employment-based development.
- 9.312 One of the most significant effects arising from housing development and an increased population is the potential for an increase in car ownership. This may lead to an increase in journeys made by car throughout the city, although it is recognised that car ownership does not necessarily equate to trips made. Any increase in journeys made by car will have a direct impact on the local environment, through reduction in air quality and increase in road-related noise, and increased congestion, all of which can have an impact on health. This will also have an impact on the wider environment, through the increase in emissions of greenhouse gases, therefore contributing towards climate change. An increased local population may also lead to an increase in journeys by other mode, e.g. by buses, which also have air quality impacts.
- 9.313 Other forms of development, such as major sites for employment, increased retail provision and further tourist attractions may also increase journeys made by car, some of which will originate from outside the local area. Other employment related journeys may also increase, such as travel to work and deliveries serving local businesses, which can include freight or more polluting vehicles.
- 9.314 Despite the potential for an increase in car and other journeys, the Sustainability Appraisal noted the numerous positive references to sustainable transport within the Plan, and considered the policy requirements relating to sustainable transport to be robust.
- 9.315 The delivery of at least 11,300 new homes in the city will put pressure on land available and there is likely to be competition between the need for different uses. Although the majority of dwellings can be situated within the built up area of the city on previously developed land, there is the identified need to develop Greenfield land to accommodate this requirement, as well as meet wider employment and other infrastructure needs. Development on any areas of Greenfield land has the potential for adverse impacts depending on its location, such as impacting upon the setting of the South Downs National Park, impacting on the underlying aquifer in terms of effecting water quality and quantity, and potentially reducing the city's ability to adapt to impacts associated with climate change such as increased rainfall and temperature. However it is recognised that with significant mitigation, there is the opportunity to gain positive outcomes to meet the city's needs from development in this location.
- 9.316 Another significant impact arising from development is the impact on natural resources, particularly water. Although the citywide policies require high environmental standards to be met, including minimising water consumption in new build, the city's overall water consumption will increase with the levels of development proposed. New development will also increase the need for energy, and it will be imperative that high building standards are achieved to ensure carbon levels do not increase.

9.317 The increased population arising from the levels of development will also increase pressure on local services and amenities, although it is recognised that certain types of services, such as schools, community and health facilities are specifically required in some policies to help meet identified areas of pressure. The increased population will also significantly increase the pressure on existing open space, which is already under-provided for in some areas of the city for the existing population. The requirement to increase provision of open space to meet the increasing population's needs is likely to prove difficult given the constraints of the city and competition between varying land uses.

9.318 The increased population arising, as well as the construction stages of development, will generate an increase in municipal and construction waste.

9.32 Significant Positive Impacts

9.321 There are a number of beneficial impacts arising from the City Plan.

9.322 The level of affordable housing in the city is currently below that required to meet local needs. Delivery of housing will increase the amount of affordable homes, provided that policy requirements relating to percentage of affordable housing to be delivered are met. This will benefit a wide range of the local population currently unable to access the housing they require, and have wider benefits including the potential for reduce housing-based deprivation. The Plan will enable some of the future housing needs to be accommodated at a level that takes into account the constraints of the city, however it is recognised that negotiations will be required under the Duty to Co-operate to fully meet the full amount of housing required locally.

9.323 The increase in the amount and type of employment land proposed, although lower than the amount assessed as required to meet the future needs of the city, is still considered to contribute towards increasing the employment capability of the city, will help to meet the needs of specific sectors that lack affordable and appropriate workspace, and will help to increase the attractiveness of the city to major employers, potentially leading to an increase in higher value job creation locally as well as helping support local economic growth. There is a risk that job-growth and the local economy may be constrained if the full employment floorspace requirements are not provided for, and this will need careful consideration in Part 2 of the City Plan. An increase in local employment floorspace may also have indirect benefits such as a reduction in out-commuting, reducing the need to travel and having wider environmental benefits.

9.324 The City Plan should lead to improvements in design, quality and sustainability of new build, with particularly high targets established relating to sustainable building design. This should help to reduce the carbon emissions resulting from all forms of new development, having wider environmental and social benefits and contribute towards reducing the city's carbon footprint.

9.325 The City Plan should lead to improvements in access to services, through investment and improvement in sustainable transport provision, through the direction of development to areas with good transport links, through the protection of the hierarchy of town, district and local centres, and promotion of mixed use development in appropriate locations. In addition, should help to co-ordinate

improvements that facilitate movement on foot or by bike in a range of areas throughout the city.

- 9.326 The implementation of the City Plan, particularly at the operational stage of development has the potential to bring about a range of health benefits, with all of the wider determinants of health being delivered. The policy's key benefits to health include improving choice and availability of housing; improving the cultural, historical, leisure and retail industries and associated income and employment opportunities; increasing access and accessibility through public transport and public realm improvements and increasing opportunities for physical activity; improving services and amenities and enhancing the built environment; and increasing and enhancing local biodiversity, greenways and open space. The policies also seek to deliver initiatives that will help to reduce deprivation, as well as deliver improvements to all neighbourhoods.

Section 10 Monitoring & Implementation

10.1 Introduction

- 10.11 It is a requirement of the SEA Directive that the significant effects of the City Plan are monitored. This will be achieved by using some of the indicators which are set out in Section 5 and Appendix B of this document, as well as other indicators that have been developed whilst assessing the emerging policies, to monitor the impacts on the environment, economy and social aspects of the city.
- 10.12 The monitoring will be undertaken on an annual basis, where possible, and will be incorporated into the wider annual monitoring and presented in the Authority Monitoring Report (AMR). There may be some indicators which cannot be measured annually, depending on the type and nature of the indicator, and these will be monitored according to the timescales which are possible.

10.2 Indicators Proposed

- 10.21 At draft City Plan stage (May 2012) the Sustainability Appraisal proposed a number of indicators for each policy, some of which were taken forward into the Implementation & Monitoring Section of the City Plan. See Section 12 Sustainability Appraisal May 2012.
- 10.22 During the current stage, where the Sustainability Appraisal has considered the re-assessment of a policy necessary due to a significant change, then the former recommendations for monitoring have also been re-considered. However, as no significant adverse impacts were identified from the Sustainability Appraisal, no further recommendations for monitoring have been made.
- 10.23 The following table outlines the monitoring indicators proposed. These indicators are the general Sustainability Appraisal indicators proposed. It should be noted that final monitoring arrangements will be confirmed in the Sustainability Statement that will be produced after the City Plan has been finally adopted and that there may be minor changes to wording to better reflect or assist data collection.
- 10.24 Where relevant, when reported in the AMR, monitoring will show where a situation has improved, stayed the same, or become worse, compared to the previous year's data.

Table 10.1 Indicators to monitor the impact of the City Plan against the Sustainability Appraisal Objectives

Indicators considered relevant to the Sustainability Appraisal Objectives, which have already been included as indicators in the final City Plan Monitoring & Implementation table, have not been included in this table to avoid duplication.

SA Objective	Indicator	Data Type/Source
1) To prevent harm to and achieve a net gain in biodiversity	Number and area of designated sites (SAC, SSSI, SNCI, LNR, AONB, RIGS).	Contextual Indicator www.natural-england.gov.uk
	Percentage of area of SSSI land in (a) favourable condition (b) unfavourable recovering condition (c) unfavourable no change condition (d) unfavourable declining condition (e) area part destroyed / destroyed	Contextual Indicator www.natural-england.gov.uk
	SQM of habitat or biodiversity features added or lost (citywide)	Significant Effects Indicator Sustainability Checklist
2) To improve air quality	Percentage of monitoring sites which indicate an improvement in levels of NO2 from previous year	Significant Effects Indicator BHCC Environmental Health team
	Percentage of monitoring sites which indicate that levels of NO2 exceed the National Air Quality Objective	Significant Effects Indicator BHCC Environmental Health team
	Change in extent of AQMA in Brighton & Hove	Significant Effects Indicator BHCC Environmental Health team
3) To maintain local distinctiveness	Number and % of Listed Buildings that are Grade 1 and 2* (a) on at risk register (b) subject to unauthorised alterations (c) subject to demolition (d) successful enforcement action	Significant Effects Indicator BHCC Design & Conservation team
4) To protect, conserve and enhance the South Downs	Number of bus services that operate to the South Downs from Brighton & Hove	Contextual Indicator BHCC Transport team
	Amount of land under: 1) Entry level 2) High level environmental stewardship schemes	Significant Effects Indicator Natural England

SA Objective	Indicator	Data Type/Source
5) To meet the essential need for decent housing	Net additional housing completions. Net affordable housing completions.	Authority Monitoring Report
6) To reduce the amount of private car journeys	Car ownership per household	Contextual Indicator Census
	Annual average daily traffic flow: (a) Outer cordon sites: 5, 22, 608 and 620 (b) City centre cordon sites: 74, 800, 809, 813	Significant Effects Indicator BHCC Transport team
	Annual average daily cycle flow: (a) National Cycle Route 2 sites: 957, 966 (b) National Cycle Route 90 sites: 960, 961	Significant Effects Indicator BHCC Transport team
	Percentage of development where parking is provided for bicycles.	Significant Effects Indicator Sustainability Checklist (SPD08)
	Percentage of residential units delivered that are car-free	Significant Effects Indicator Planning Strategy
7) Minimise the risk of pollution to water resources	Status of the groundwater resource as measured by the requirements of the Water Framework Directive.	Contextual Indicator Environment Agency
	Quality of bathing water	Contextual Indicator Environment Agency
	Percentage of new development incorporating SUDS within the development or beyond the development area.	Significant Effects Indicator Sustainability Checklist (SPD08)
8) Minimise water use in all development	Per capita domestic consumption of water	Contextual Indicator
	Percentage of new development incorporating measures to reduce water consumption.	Significant Effects Indicator Sustainability Checklist (SPD08)
9) Promote the sustainable development of land affected by contamination	Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act.	Significant Effects Indicator Environmental Health Team
10) Manage coastal defences and minimise coastal erosion and flooding	Number of developments in a flood risk areas granted contrary to the advice of the Environment Agency	Single Data List: 243-01 Authority Monitoring Report

SA Objective	Indicator	Data Type/Source
11) To balance the need for employment creation	Level of GVA per head	Contextual Indicator
	Amount (£) of developer contributions secured for training for local residents, through the Local Employment Scheme	Significant Effects Indicator Planning Strategy
12) To support initiatives that combine economic development with environment protection	Proportion of VAT registered businesses per 10,000 population	Contextual Indicator
	Percentage population that are in employment	Contextual Indicator
13) To improve the health of all communities	Life expectancy at birth (males, females - years)	Contextual Indicator www.sepho.org.uk
	Obesity among primary school in year 6 (percentage)	Contextual Indicator City Performance Plan.
	Adult participation in sport (percentage)	Contextual Indicator City Performance Plan.
	Under 18 conception rate	Contextual Indicator City Performance Plan.
	Alcohol-harm related hospital admission rates (per 1000 population)	Contextual Indicator City Performance Plan.
	Smoking quitters per 100,000 population	Contextual Indicator City Performance Plan.
14) To integrate health and safety considerations	Number of total police recorded crimes.	Contextual Indicator BHCC Community Safety Team
	People killed or seriously injured in road traffic accidents	Contextual Indicator City Performance Plan.
15) To narrow the gap between the most deprived areas and the rest of the city	Percentage of population living in the 20% most deprived super output areas in the country	Contextual Indicator Index for Multiple Deprivation
	Percentage of population over 60 who live in households that are income deprived	Contextual Indicator Index for Multiple Deprivation
	Tackling fuel poverty - Percentage of people receiving income based benefits living in homes with a low energy efficiency rating	Contextual Indicator City Performance Plan.
	Percentage of young people who are not in employment, education or training (NEET);	Contextual Indicator City Performance Plan.

SA Objective	Indicator	Data Type/Source
	Percentage of non-decent council homes	Contextual Indicator City Performance Plan.
16) To engage local communities in the planning process	Number of adopted DPDs or SPDs that have incorporated periods of public consultation	Significant Effects Indicator Planning Strategy & Projects Team
17) To make the best use of previously developed land	Percentage of new and converted dwellings on Previously Developed Land	Core Output Indicator H3 Authority Monitoring Report
	Percentage of new employment land on Previously Developed Land	Core Output Indicator BD2 Authority Monitoring Report
	Percentage of development situated on Greenfield land.	Core Output Indicator Authority Monitoring Report
18) To maximise sustainable energy use	Kt of CO2 emitted from domestic sources for energy provision per capita	City Performance Plan DECC
	Average annual domestic consumption of gas and electricity	City Performance Plan DECC
	Average annual commercial and industrial consumption of gas and electricity	City Performance Plan DECC
	Percentage increase in home energy efficiency	HECA Report
	Renewable energy generation.	Core Output Indicator (E3) Authority Monitoring Report
19) To ensure developments have taken into account the changing climate	Percentage of new development incorporating green walls/roofs.	Significant Effects Indicator Sustainability Checklist (SPD08)
20) To encourage new developments to meet Code for Sustainable Homes or BREEAM standards	% of new non-residential development meeting the minimum standards as required by BH.	Significant Effects Indicator Sustainability Checklist (SPD08)
21) To promote and improve integrated transport links and accessibility	Percentage of development that allow good safe and direct access between the development and local schools, employment, shops GP surgeries and leisure facilities.	Significant Effects Indicator Sustainability Checklist
22) To reduce waste generation	Tonnes of Municipal Solid Waste produced per annum	Contextual Indicator BHCC
	Tonnes of Commercial and Industrial Waste produced per	Contextual Indicator

SA Objective	Indicator	Data Type/Source
	annum	BHCC
	Tonnes of Construction and Demolition Waste produced per annum	Contextual Indicator BHCC
	Residual household waste per household	City Performance Plan
	Percentage of household waste: (a) recycled (b) composted (c) used to recover heat, power, and other energy sources	Contextual Indicator BHCC
	Percentage of development providing facilities for recycling.	Significant Effects Indicator Sustainability Checklist (SPD08)

Appendix A - Plans, policies and guidance

General / Cross Cutting		
Report of the World Summit on Sustainable Development (WSSD), Johannesburg – Commitments arising from Johannesburg Summit	United Nations	Sep-02
Code for Sustainable Homes: Setting the Sustainability Standards for New Homes and accompanying Technical Guidance - November 2010	CLG	Feb-08 & Nov-10
A Practical Guide to the Strategic Environmental Assessment Directive (practical guidance on applying European Directive 2001/42/EC)	CLG	Sep-05
Plan Making Manual guidance on Sustainability Appraisal of LDFs	Planning Advisory Service	'Live' online guidance
Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (now officially superseded by the Plan Making Manual guidance, but still used for reference).	CLG	Nov-05
Securing the future: delivering UK sustainable development strategy	DEFRA	Mar-05
Localism Act	CLG	Oct-11
Local Planning Regulations	CLG	Jul-11
National Planning Policy Framework	CLG	Mar-12
National Infrastructure Plan	Treasury	Oct-10
Sustainable Community Strategy – Creating the City of Opportunities	Brighton & Hove Strategic Partnership	2010
Adopted Brighton & Hove Local Plan	BHCC	Jul-05

Air		
Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	European Parliament and Council	2008
The Environment Act 1995 Part IV	CLG HMSO	1995
Air Quality Strategy for England, Scotland, Wales and Northern Ireland: Working Together for Clean Air (and addendum 2003)	Department of the Environment, Transport and the Regions, Scottish Executive, National Assembly for Wales and Department of the Environment in Northern Ireland.	Jan-00 and Feb-03
Air Quality Action Plan and subsequent Air Quality Progress Reports	BHCC	2011

Biodiversity, flora and fauna		
EU Directive 2009/147/EC on the conservation of Wild Birds	EC	2009
EU Directive 92/43/EEC "Habitats Directive"	EC	1992
International Convention on Biological Diversity		1992 & 2010
UK Biodiversity Action Plan	CLG	1994
Conservation (Natural Habitats &c) Regulations 1994 as amended	HMSO	1994
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011)	DEFRA	2011
Natural Environment and Rural Communities Act	HMSO	2006
Natural Environment White Paper	Defra	2011
From Rio to Sussex Action for Biodiversity: a Biodiversity Action Plan for Sussex	Sussex Biodiversity Partnership	Jul-98

South East Biodiversity Strategy	South East England Biodiversity Forum	Feb-09
Trees and Development Sites SPD	BHCC	Mar-06
Nature Conservation SPD	BHCC	March-10
Green Network for Brighton & Hove	Sussex Wildlife Trust Sussex Environment Partnership & BHCC	June-09
Draft Local Biodiversity Action Plan v.4	BHCC	2011

Climatic factors		
Kyoto Protocol to the United Nations Framework Convention on Climate Change	United Nations Convention	Dec-97
Nottingham Declaration on Climate Change	Ministry of State for Environment and Agri-Environment	Oct-00
Adapting to Climate Change: a checklist for development	Government Office for the South East	Nov-05
Beyond Copenhagen: The UK Government's International Climate Change Action Plan	DECC	2010
Climate Change Act	HMSO	2008
Climate Change Strategy	BHCC	2011

Cultural heritage and landscape		
National Parks & Countryside Act 1949 and Environment Act 1990	HMSO	1949 1990
The Historic Environment: A Force for our Future	Department for Culture, Media and Sport	2001
Marine Policy Statement	Defra	March-11
Conservation Principles, Policies and Guidance	English Heritage	2008
Heritage Counts 2006: The State of the South East's Historic Environment	English Heritage	2006
South Downs Management Plan 2008-2013	South Downs Joint Committee	2008
A Strategy for Archaeology in East Sussex	East Sussex County Council	1993
The Cultural Agenda: Realising the Cultural Strategy of the South East England Cultural Consortium	South East England Cultural Consortium	Nov-02
Social Enterprise Culture: Learning lessons from Cultural Social Enterprises in the South East	South East England Regional Assembly and South East England Cultural Consortium	2005
Streets for All - South East	English Heritage/DoT	2005
Urban Fringe Landscape Studies	Sussex Downs Conservation Board	2002
Stanmer Park Restoration Management Plan	BHCC	2003
A Strategy for the Conservation of Brighton & Hove's Historic Built Environment and Supplementary Planning Guidance Notes (SPG1, SPG2, SPG 7, SPG11, SPG13, SPG19)	BHCC	Sep-03 1975 to 2004
Shop front design SPD	BHCC	Sept-05
Advertisements SPD	BHCC	June-07
Urban Characterisation Study	BHCC	2009

Economic development		
Strategy for Sustainable <u>Farming and Food</u> - Facing the Future	DEFRA	Dec-02 04
Tomorrows Tourism Today	Department Culture, Media and Sport	Jul-04
Regional Economic Strategy for South East England 2006 – 2016	South East England Development Agency	Jul-06
Tourism ExSEllence: The Strategy for Tourism in the South East	Tourism South East (VisitSouthEastEngland)	2004
Creative Industries in Brighton and Hove Report and Strategy	BHCC	2000
Brighton & Hove Regeneration Strategy	Brighton & Hove Regeneration Partnership	Apr-02
Brighton & Hove Economic Strategy 2008-2016	Economic Partnership and BHCC	2008
Brighton and Hove Tourism Strategy 2008-2018. A refreshed strategy for the visitor economy	Economic Partnership and BHCC	2008
Brighton Centre: Area Planning and Urban Design Framework SPD01	BHCC	Jan-05
Brighton & Hove Retail Study	GVA Grimley for BHCC	2006
Brighton & Hove Retail Study Update	CBRE	2011
Employment Land Study and Update	Roger Tym & Partners for BHCC	2006 & 2009
Employment Land Study	NLP	2012
Edward Street SPD04	BHCC	Mar-06
Circus Street SPD	BHCC	Mar-06
London Road & Lewes Road Regeneration Strategy (LR2) (2007)	Urban Initiatives for BHCC	2007
London Road Central Masterplan SPD10	BHCC	2010
Hotel Futures Study	Hotel Solutions for BHCC	2007
Creative Industries and Workspace Study	Keith Hackett for BHCC	2008

Energy		
EU COM(97)599 final : White Paper 'Energy for the future: renewable source of energy'	European Commission	Nov-97
EU COM (06) 848: Renewable Energy Road Map	European Commission	2006
Directive 2001/77/EC on the promotion of electricity produced from renewable energy sources in the internal electricity market	European Parliament and European Council	Sep-01
Renewable Energy Directive 2009/28/ec	EU	2009
EU Directive 2002/91/EC on the <u>energy performance of buildings</u>	European Parliament and European Council	Dec-02
Home Energy Conservation Act 1995	HMSO	1995
Energy Act 2008	Defra	2008
Draft NPS (EN1) Overarching National Policy Statement for Energy	DECC	2009
Renewable Energy Strategy	DECC	2009
Microgeneration Strategy	DECC	2011
A Home Energy Efficiency Strategy for Brighton & Hove	BHCC, Environment & Housing,	Jan-01
Brighton & Hove Home Affordable Warmth	BHCC, Private Sector	Oct-02

A Fuel Poverty Strategy for residents of Brighton & Hove	Housing	
SPD08 Sustainable Building Design	BHCC	Sep 08
Renewable and Sustainable Energy Study	AECOM	2012

Material assets		
Sustainable Communities: Homes for All (5 Year Plan)	CLG	Jan-05
Sustainable Communities: settled homes; changing lives (a strategy for tackling homelessness)	CLG	Mar-05
Improving Opportunity, Strengthening Society: The Government's strategy to increase race equality and community cohesion	Home Office	Jan-05
South East Regional Investment Strategy 2003/2004	Housing Corporation	2002
Regional Housing Strategy 2008-2011	South East Regional Housing Board	2008
Minerals Local Plan	East Sussex County Council and BHCC	Nov-99
Housing Strategy 2009-2014	BHCC	2008
Tall Buildings Study	Gillespies for BHCC	2003
Audit of Community Level Infrastructure	Trust for Developing Communities	2004
Infrastructure Capacity Study	Baker Associates for BHCC	2006
Housing Needs Survey	David Couttie Associates for BHCC	2005
East Sussex and Brighton & Hove Gypsy & Traveller Study	East Sussex County Council and BHCC	2006
Open Space, Sport and Recreation Study	PMP for BHCC	2009
Open Space Sports and Recreation Study Update	JPC	2011
Strategic Housing Land Availability Assessment and associated updates	BHCC	2011
Strategic Housing Market Assessment	DTZ for BHCC	2008
Affordable Housing Viability Study	BHCC	2008
Housing Requirements Study and Update	GL Hearn	2011 & 2012
Affordable Housing Viability Study Update		2012

Population and human health		
EU Directive 2002/49/EC relating to the assessment and management of environmental noise	European Parliament and Council	Jun-02
Noise Policy Statement for England	Defra	2010
Choosing Health – Making Healthy Choices Easier	Department of Health	2004
White Paper – Healthy Lives, Healthy People	DoH	Nov-10
Department of Health PSA	Department of Health	2004
Food Industry Sustainability Strategy (FISS)	Department for the Environment, Food and Public Affairs	Apr-05
Strategy to Reduce Health Inequalities in Brighton & Hove	Public Health Directorate	2005
Noise Action Plan – Brighton Agglomeration	Defra	2010
Spade to Spoon: Making the Connections - A Food Strategy and Action Plan for Brighton and Hove and update, Dig Deeper 2011	Brighton & Hove Food Partnership	2006 2011
Joint Strategic Needs Assessment	NHS Brighton & Hove	2012

Social inclusiveness		
Planning and Access for Disabled People : A Good Practice Guide	CLG	Mar-03
National Neighbourhood Renewal Strategy (A New Commitment to Neighbourhood Renewal: A National Strategy Action Plan)	CLG	Jan-01
Towards the Development of Extended Schools	National Foundation for Educational Research	Jun-03
14-19 Education and Skills White Paper	Department for Education and Skills	Feb-05
South East Region Social Inclusion Statement	South East England Regional Assembly	Apr-02
Children & Young People's Plan 2009-2012	BHCC	2009
Reducing Inequality Review	OCSI and Educe Ltd for BHCC	2008

Transport		
European transport policy for 2010: time to decide	European Commission, DG Energy and Transport	Nov-01
Ten key transport and environment issues for policy-makers - TERM 2004: Indicators tracking transport and environment integration in the European Union	European Environmental Agency	2004
White Paper: Creating Growth, Cutting Carbon	Dft	Jan-11
Guidance on Accessibility Planning in Local Transport Plans	Department for Transport	Dec-04
Delivering a Sustainable Transport System	Department for Transport	Nov-2008
Active Travel Strategy	Department for Transport	Feb-2010
From Crisis to Cutting Edge: Regional Transport Strategy (Regional Planning Guidance 9 / Draft Replacement Chapter 9)	South East England Regional Assembly	Jan-03
BHCC Full Local Transport Plan 3 2011-2026	BHCC	May-11
Transport Assessment	JMP for BHCC	2009
Transport Assessment	JMP for BHCC	2012

Waste		
The Directive on Waste (75/442/EEC, as amended by Directive 91/692/EEC)	European Commission	1999
Waste Electrical and Electronic Equipment (WEEE) Directive 2002/96/EC	European Commission,	2002
Waste Strategy for England	Defra	2007
Government Review of Waste Policy in England	Defra	2011
PPS 10: planning for sustainable waste management	ODPM	2005
PPS 10 Companion Guide	DCLG	2006
Update to PPS10 – waste hierarchy	CLG	2011
East Sussex and Brighton & Hove Waste Local Plan	East Sussex and Brighton & Hove	2006
Construction & Demolition Waste SPD	East Sussex and Brighton & Hove	2006
Waste & Minerals Local Plan Proposed Submission	East Sussex and Brighton & Hove	2012

Water and soil		
EU Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources	European Parliament and Council	Dec-91
EU COM (2002) 581 final: Proposal for a Directive concerning the quality of bathing water	European Commission	Oct-02

EU Water Framework Directive (2000/60/EC)	European Commission	2000
European Thematic Strategy for Soil Protection	EU	2006
Water for Life (White Paper)	DEFRA	Dec 2011
Future water : the Government's water strategy for England	DEFRA	Feb-08
Making space for water : Taking forward a new Government strategy for flood and coastal erosion risk management in England	DEFRA	Mar-05
Water for people and the environment: Water Resources Strategy for England and Wales	Environment Agency	Mar-09
The Flood and Water Management Act 2010	HMSO	2010
The Pitt Review: Learning Lessons from the 2007 Floods	Independent Report to Government	2008
Soil Action Plan for England 2004-2006	Defra	2004
Safeguarding our soils: A Strategy for England	Defra	2009
Shoreline Management Plan , Beach Head to Selsey Bill – First Review	South Downs Coastal Group	May 2006
Adur and Ouse Catchment Abstraction Management Strategies (CAMS)	Environment Agency	2005
River Basin Management Plan for the South East	Environment Agency	Dec-09
Water Resources Management Plan 2010–2035	Southern Water	Oct-09
Brighton & Hove's Contaminated Land Strategy	BHCC	Updated Sep '05
Brighton & Hove Strategic Flood Risk Assessment	Peter Brett Associates for BHCC	2008
Brighton & Hove Strategic Flood Risk Assessment update	JBA Consulting	2012

Appendix B – Sustainability Appraisal Objectives, indicators and baseline information

References to former National Indicators have been included where applicable, however will be removed and may be replaced by other indicators in the future.

It should be noted that, due to changes in the Sustainability Checklist, data collated through the Checklist will not provide information for a complete year until April 2013. Some data has been provided however this is not reflective of a full year's data.

1. To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people				
Indicators	Source of Data	Data	Comparison/Targets	Trend
(CPP) Number and area of designated sites (SAC, SSSI, SNCI, LNR, NP and RIGS) presented as a percentage of the total administrative area of Brighton & Hove	http://www.natureonthemap.org.uk CityWildlife website Special Places Wildlife Trust (Rachel Hackett) 01636 670096 The Brighton & Hove Habitat Audit 2007-2009 Local Biodiversity Action Plan for Brighton & Hove (pre-consultation draft 2011)	B&H: 2 SSSIs* B&H: 62 SNCIs (7.2%) (612.3ha) B&H: 8 LN (7.4%) (628.5ha) B&H: 1SAC* B&H: 1 National Park (approx 40%) B&H: 4 RIGS *SSSIs and SAC combined make up makes up 1.6% of total administrative area covering 138.8ha.	England: 4,000 SSSIs (7% of country's area). England in 2002 estimated 34,965 SNCIs. England: 1,280 LNRs (40,000 ha) England: 236 SACs 50 RIGs groups but no accurate information. (Estimated 2,000-4,000 RIGS sites.) In accordance with the CBD Nagoya 2010 agreement, to increase the amount of land designated as a terrestrial protected site from 15% to 17%	No measurable trend as such.
% area of SSSI land in: (a) a favourable condition or (b) an unfavourable recovering condition (c) an unfavourable no change condition (d) an unfavourable declining condition (e) area part destroyed / destroyed	Natural England	Brighton-Newhaven Cliffs (2009): 100% in a favourable condition Castle Hill (2009): 100.00% in a favourable condition	Target: Public Service Agreement set by the Government requires that 95% of SSSIs be in a favourable (or unfavourable recovering) condition by 2010. B-N Cliffs improved since 2005 when 89.13% in favourable condition. C Hill improved since 2003 when 100% in unfavourable recovering condition (http://www.natureonthemap.org.uk/identify.aspx)	Generally improving over time.
Extent of Natural and Semi Natural Green Space found in the council area (including hedgerows)	Open Space, Sports & Recreation Study 2009	355 sites of Natural and Semi Natural Green Space; covering 709 hectares.	No targets as such.	Static – amount unlikely to change.

1. To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people				
Indicators	Source of Data	Data	Comparison/Targets	Trend
Amount of land managed primarily for biodiversity in: (a) Local Nature Reserves (b) Other sites	Local Biodiversity Action Plan for Brighton & Hove (pre-consultation draft 2011)	Local Nature Reserves cover 7.4% of the administrative area of Brighton & Hove. This is equivalent to 628.5 hectares.	No comparable target.	Trend unknown.
Area of semi-natural green space available for community use per 1000 population	Open Space, Sports & Recreation Study 2009	2.8 hectares / 1000 population. However only approx 100 ha lie within the built up area (0.4 ha / 1000 population)	Local target: Quantity: 2.8 hectares / 1000 population. Accessibility: within 15 minutes' walk (720 metres) Other cities: - Bristol 0.09 ha/1000 pop - York 1.61 ha/1000 pop - Wolverhampton 1.46 ha/ 1000 pop - Middlesbrough 1.9 ha/1000	Likely to worsen as population increases and amount of open space stays the same.
Achievement of specified biodiversity action plan targets	Local Biodiversity Action Plan for Brighton & Hove (pre-consultation draft 2011)	There are many targets set out in the draft LBAP. Once adopted, discussions will be held to use some, but not all of the information for the baseline information.	Many of the local targets, have regional and national targets also. Again, once adopted certain data will be used for baseline information.	Unknown.
Change in: (a) Populations of local SAP species (b) Area of semi-natural habitat within greenway network	Data not available at present	Data not available at present	Data not available at present	-
Extent and condition of habitats included in LBAP	Local Biodiversity Action Plan for Brighton & Hove (pre-consultation draft 2011)	There are many targets set out in the draft LBAP. Once adopted, discussions will be held to use some, but not all of the information on habitats for the baseline information.	Many of the local targets, have regional and national targets also. Again, once adopted certain habitat data will be used for baseline information.	Unknown
Level of developer contributions made to off site open space/parks?	BHCC Planning Strategy Team	10/11: £563,098 (5 x schemes) 09/10: £174,227 (3 x schemes) 08/09: £130,427 (3 x schemes) 07/08: £87,262 (3 x schemes)	No targets	Amount of schemes increasing although this may signify that less open space is available to meet needs of population.
Amount of Ancient Woodland (hectares)	Estimated data from www.magic.gov.uk	Estimated data 2009: 87.5 hectares	No National targets as such. Local target of no net loss.	Static – amount unlikely to change.

1. To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people

Indicators	Source of Data	Data	Comparison/Targets	Trend
(SC) Does the development avoid damage to biodiversity (presented as sqm of habitat or amount of features added or lost.)	Sustainability Checklist	When developments with a submission to the new sustainability checklist and approved in 2011/12 are complete they will provide an extra 54.4 m2 of Chalk Grassland and 132.7m2 of other uses (Sedum and Garden)	No national targets as such.	Unknown.

2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning

Indicators	Source	Data`	Comparison/target	Trend
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2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning

Indicators	Source	Data`	Comparison/target	Trend
<p>What air quality monitoring exists across the city?</p>	<p>BHCC Environmental Health team</p> <p>2010 Air Quality Reports</p> <p>2011 Air Quality Action Plan</p>	<p>NO2: Approximately 65 citywide diffusion tubes. In addition, there are 3 continuous analyser sites. The continuous analysers at Hove Town Hall and the Pavilion will be decommissioned and new analysers will be put in place at North Street and on the Lewes Road, reflecting areas where NOx concentrations are high (worst case locations.)</p> <p>Particulates: There is one PM2.5 analyser in the city (at Preston Park which forms part Defra's national network of PM2.5 analysers. There is one analyser for recording PM10 situated by Beaconsfield Road.</p> <p>Ozone: At present we have three ozone analysers in the city.</p> <p>Others: One monitoring location for PAH (Poly Aromatic Hydrocarbons).</p> <p>Sulphur Dioxide, Carbon Monoxide and benzene are no longer monitored through the continuous analysers as they are not an issue in the city.</p>	<p>Target: make sure that the national air quality objectives will be achieved throughout the UK by the relevant deadlines to protect people's health and the environment.</p>	<p>No measurable trend as such.</p>

2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning				
Indicators	Source	Data	Comparison/target	Trend
Are levels of NO2 below the National Air Quality Objective?	2011 Air Quality Action Plan 2012 Progress Report	<p>From the 2012 progress report, levels of NO2 have improved at 61 out of 63 sites since the previous monitoring period. However, despite the improvement 46 out of 63 diffusion tube sites still exceeded the annual mean objective for air quality, although this has decreased from 50 in 2010.</p> <p>The site that would need the greatest improvement to meet the AQO was C11 on North Street, with NO2 levels of 79µg/m3, which is almost twice the legal limit. This is one of the sites where levels have worsened since the last monitoring period.</p>		Overall little improvement over the last ten years.
Are levels of fine particles PM10 below the National Air Quality Objectives?	BHCC Environmental Health	<p>During 2011 PM10 has been monitored at Roadside on Beaconsfield Road adjacent to the A23. An eleven month mean was recorded equal to 27.4 µg/m3. This compares to an annual average limit value of 40 µg/m3. In just under eleven months there were 15 daily means greater than 50 µg/m3. Equivalent to 20 days for the full year which compares to an allowed number of 35 days for the calendar year.</p> <p>Defra's automatic urban and rural network includes a monitoring station in Preston Park, Brighton. 2011 results indicated PM2.5 annual mean of 12 µg/m3 at this site. The level compares to the EU target of 25 µg/m3.</p>	<p>Nationally total emissions of PM10 fell by 50 per cent (192 thousand tonnes) between 1980 and 2006. However, PM10 increased in 2006 for the first time since 1990.</p> <p>Results for B&H are similar to other roadside sites in East Sussex and are slightly lower than those recorded over a similar period in Hastings and Eastbourne. At comparable roadside localities we would expect a slight increase in particulate matter to the east due to lower rainfall and greater proximity to continental Europe.</p>	Insufficient data
Extent of air quality management area in Brighton & Hove	BHCC Environmental Health and Air Quality Progress Report 2010	There is one AQMA (for NO2) that was declared in 2008. This encompasses a larger area of the city than the previous AQMA, ranging from the boundary with Adur District Council in the west of the city, bounded by the Old Shoreham Road to the north, including parts of Preston Road and Lewes Road, and extending to Arundel Road in the east of the city.	The former 2004 AQMA was extended in 2008 to include new areas of exceedence. The 2010 Air Quality Progress Report showed that 2 monitoring locations outside the AQMA exceeded the AQO for the first time. A Detailed Review of these sites is now under way.	AQMA has increased over recent years.

3. To maintain local distinctiveness and preserve, enhance, restore and manage the City's historic landscapes, townscapes, parks, buildings and their settings and archaeological sites effectively				
Indicators	Source	Data	Comparison/target	Trend
Number and % of Listed Buildings (Grade I and II*): (a) On the At Risk register; (b) Subject to unauthorised alterations; (c) Subject to demolition; and (d) Successful enforcement actions.	Heritage Team and Heritage at Risk Register English Heritage	477 (14%) buildings are graded 1 and 2* (a) 9 buildings on the current EH register. This is 1.8% of the total (476) compared to the national average of 3.0% (EH 'At Risk' Register 2012). (b) Data not available; (c) Data not available; (d) Data not available;	Percentage of Listed Buildings is more than double the national average (6%). Target: to improve performance over time.	More buildings on at risk register now than in 2011 due to a change in reporting, with the register now including places of worship at risk.
Number of conservation areas in the city.	Heritage Team English Heritage	There are 34 conservation areas throughout the city. 6 of these are classified as being at risk (EH 'At Risk' Register). This is 17.6% of the total.	The Carlton Hill Conservation Area was recently declared in 2008. National average for CA at risk is 7.4% (EH 'At Risk' Register).	Less CA on at risk register now than in 2009, therefore situation improving.
Number of conservation areas de-designated, or parts of conservation areas de-designated, as a result of loss of historic and architectural detail.	Heritage Team and monitoring from Architectural Features SPD 2009.	2010/11 – No conservation areas or parts of conservation areas have been de-designated.	No targets at such	No measureable trend as such.
Percentage of conservation areas where the loss of historic or architectural detail is considered to be a 'significant' or 'very significant' problem.	Heritage Team and monitoring from Architectural Features SPD 2009.	This indicator will be monitored every five years, from a starting baseline of 33% in 2008/09 when the SPD was adopted. The first data for this indicator will be due in 2013/14.	No targets as such The starting baseline figure is 33% (2008/09)	Unknown.
Number of Conservation Areas with character appraisals	Heritage Team	29 out of 34 have character appraisals. In 2010/11 character appraisals were adopted for Portslade Old Village and Patcham.	Target of 100% Produce 2 appraisals per year.	No measurable trend as such.
Number of Conservation Areas with management plans	Heritage Team	9 (26%)	100%	No measurable trend as such.

3. To maintain local distinctiveness and preserve, enhance, restore and manage the City's historic landscapes, townscapes, parks, buildings and their settings and archaeological sites effectively				
Indicators	Source	Data	Comparison/target	Trend
Amount of eligible open spaces managed to green Flag award standard?	BHCC website	6 Parks across the city awarded the Green Flag award in 2011/12. Easthill Park Hove Park Preston Park Kipling Gardens Stoneham Park St Anns Wells Gardens	No national target Number of green flag parks decreased from 7 to 6 in 2008. Decreased to 5 in 2010. Increased to 6 in 2011	Improvement from recent years
Amount and type of open space per 1,000 population in comparison to the open space standards.	Open Space Sports and Recreation Study, 2009	City-wide: Children & Young People – 0.047 ha/1,000, shortfall of 0.012 ha/1000. Parks & Gardens – 0.92 ha/1000, no current shortfall identified. Natural/semi-natural – 2.8 ha/1000, no current shortfall identified. Amenity green space – 0.59 ha/1000, surplus of 0.008 ha/1000 identified Allotments/gardens – 0.23 ha/1000, no current shortfall identified. (nb results based on population 2006 – shortfalls identified for all typologies for predicted 2026 population)	Local current targets for quantity: C&YP – 0.55 ha/1000 pop P&G – 0.92 ha/1000 pop N/SN – 2.8 ha/1000 pop AGS – 0.582 ha/1000 pop A/G – 0.23 ha/1000 pop	Likely to worsen as population increases and open space unlikely to increase in line with population.
(SC) How much open space has been created and/or lost as a result of development?	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	No measurable trend as such.

4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.				
Indicators	Source	Data	Comparison/target	Trend
Number of bus services that operate to the south downs from Brighton & Hove?	BHCC Transport Team	There are 31 bus routes that run from Brighton & Hove covering access to the downs. This includes the 47, 52 and 57 which are subsidised by BHCC; numbers 77, 78 and 79 "Breeze up to the Downs Partnership, for which BHCC is the main funder; and 17, 40, 40x and 273 which run north via the A23.	N/A	No measurable trend as such.

4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.				
Indicators	Source	Data	Comparison/target	Trend
Tourist numbers visiting the south downs?	South Downs Joint Committee: South Downs Visitors Survey 2004 (no further updates available)	Estimated: 1,231,000 holiday days spent by staying tourists in SD 6,771,000 day trips to SD from visitors staying outside SD 26,705,000 day trips to SD from homes outside the area 4,340,000 day trips to SD by residents of the area	N/A	Unknown
Amount of land under: 1. Entry level; and 2. High level environmental stewardship schemes.	Natural England 2012	Entry plus higher level = 2085.2ha Entry level = 98.3 Higher level = 367.3	No National targets as such.	Unknown

4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.

Indicators	Source	Data	Comparison/target	Trend
<p>Sustainable routes available to access the Downs:</p> <p>Bus Train Bike On foot</p>	<p>www.southdowns.gov.uk</p> <p>http://www.nationaltrail.co.uk/Southdowns/uploads/SDW_transport_guide_2010_final.pdf</p> <p>http://www.opencyclemap.org/</p>	<p>Buses – see above for number of routes and services that access the Downs. In addition, there are 18 Bus Walks leaflets which features walks in the SDNP that start and end at bus stops.</p> <p>Trains – various train stations are situated within the SDNP that can be easily accessed from Brighton & Hove, including Hassocks and Lewes.</p> <p>Bike - The South Downs Way is a trail that is shared by cyclists, horse-riders and walkers that covers 160km within the SDNP that passes through Castle Hill, Ditchling Beacon and Devil’s Dyke, all of which can be accessed easily from Brighton & Hove. National Cycle Network route 82 heads north-west out of the city, joining the South Downs Trail near Fulking. NCN route 20 heads north out of the city in the direction of Pycombe. NCN route 90 heads north east out of the city heading in the direction of Lewes. NCN route 2 heads in an east/westerly direction along the seafront, thereby encompassing the cliffs east of the Marina.</p> <p>On foot – Various parts of the SDNP locally can be accessed on foot and there are a number of public rights of way that cross from the city into the SDNP, such as those at Stanmer Park, Wild Park, Foredown Ridge, Sheepecote Valley and Hollingbury Hill, as well as various other locations. The Rights of Way Improvement Plan 2007 also identified “Missing Links” in the ROW network, some of which may facilitate access. See also Bus Walks above.</p>	<p>No targets as such.</p>	<p>Unknown</p>

5. To meet the essential need for decent housing, particularly affordable housing.				
Indicators	Source	Data	Comparison/target	Trend
(CPP Headline Indicator) (H5): Gross affordable housing completions. (a) + (b) where: (a) = sum of socially rented houses (b) = sum of intermediate affordable housing	Authority Monitoring Report 10/11	11/12: 66: (21%) all of which were social rented. 10/11: 8 (3% of all housing) of which: 5 socially rented 3 intermediate housing 09/10: 100 (26% of all housing) of which: 18 socially rented 82 intermediate housing 08/09: 255 (35% of all housing) of which: 195 socially rented 60 intermediate housing 07/08: 177 (31% of all housing) of which: 98 socially rented 79 intermediate housing	CPP Target: 230 a year (it is recognised that this target is based on historical data and that numbers are likely to be far fewer due to both changes in funding and the current economic climate. Sustainable Community Strategy: target mix of new affordable homes to comprise 30% 1 beds, 45% 2 beds and 25% 3 beds.	Amount delivered has reduced over recent years, therefore situation worsening.
Net additional Housing	Authority Monitoring Report 11/12	11/12 – 309 10/11 – 283 09/10 – 380 08/09 – 721 07/08 – 567	2010/11 saw the lowest completions in the last ten years.	Amount delivered has fluctuated over recent years, reflecting the current economic climate.
(CPP) Number of new affordable homes that are family sized This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.		No data available	No target set currently.	
House price to income ratio?	Nomis Web and Land Registry	2011: 10.63 (£27,398 to £291,440) 2005: 5.95 2004: 5.54 2003: 5.61	South East 2011: 7.1 (£28,828 to £206,271)	Generally increasing over time, therefore situation worsening.
Number of new bedrooms created in purpose built student accommodation	Authority Monitoring Report 2010/11	2010/11: 798 new bedrooms created	No target as such	Unknown.

5. To meet the essential need for decent housing, particularly affordable housing.				
Indicators	Source	Data	Comparison/target	Trend
Number of properties where student-based council tax exemption applies.	Revenues Team	In 2010/11 the average monthly number of properties to which student exemptions applied was 3460. (Actual range was from 2837 to 3952). In 2009/10 this figure was 3313. In 2008/09 this figure was 3050. In 2007/08 this figure was 2681 In 2006/07 this figure was 2465 This number shows full student exemption only (e.g. where all residents in a property are students) and does not include properties whereby a discount is applied (e.g. where 1 person in a student household is in work). Therefore the actual number of properties inhabited by students is likely to be much higher.	No comparison or target as such.	Generally increasing over time, therefore amount of students inhabiting private lets increasing.

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development				
Indicator	Source	Data	Comparison/target	Trend
(CPP) Thousands of bus passenger journeys (i.e. boardings) per year in the authority (This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.)	Brighton & Hove Bus and Coach company BHCC Authority Monitoring Report (2009/10) BHCC Full Local Transport Plan 2006/07- 2010/11 BHCC Local Transport Plan Progress Report 2008	Number of bus passenger journeys: 09/10: 46.3m 08/09: 44.6m 07/08: 43.7m (Brighton & Hove Bus and Coach company)	To increase bus patronage by 1 million passenger journeys (18%) per year from 2003 baseline of 34.27m, rising to 40.2m in 2010/11. (LTP2 BVPI 102). This target has therefore been surpassed.	Generally increasing over time, therefore improving.

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development

Indicator	Source	Data	Comparison/target	Trend
(CPP Headline Indicator) NI 186: Per capita reductions in CO2 emissions in the LA area - Transport	http://www.decc.gov.uk/en/content/cms/statistics/indicators/ni186/ni186.aspx	CO2 emissions from road transport: 2010: 317 kt 2009: 320 kt 2008: 331 kt 2007: 343 kt 2006: 342 kt 2005: 346 kt All emission: Per capita total CO2 emissions: 2010: 5.0kt/capita 2009: 4.8kt/capita 2008: 5.3 kt/capita 2007: 5.5 kt/capita 2006: 5.6 kt/capita 2005: 5.7 kt/capita	UK average 2008: 7.0 tonnes per capita (total emissions) Sustainable Community Strategy (SCS) target reductions in city CO2 'direct' emissions from 2005 baseline: - 12% by 2012/13 - 42% by 2020 - 80% by 2050. (SCS 2010) 5.4% reduction in per capita emissions between 2005 and 2008 met the previous LAA target of a 4% reduction by 2008/09. Results for 2009 are equivalent to a 15.64% reduction from the 2005 baseline. (CPP Target Setting Cabinet Report Appendix)	CO2 emissions from transport generally decreasing, therefore improving.
Bus User Satisfaction - Percentage of bus users satisfied with local buses	Brighton & Hove Bus and Coach company BHCC Full Local Transport Plan 2006/07- 2010/11 BHCC Local Transport Plan Progress Report 2008	Bus users satisfied with local bus service: 2009/10: 92% 2006/7: 81% 2003/04: 80%	Target: increase the level of overall satisfaction with local bus services from 80% in 2003/04 to 82% by 2010/11 (BHCC Local Transport Plan 2006/07 - 2010/11): exceeded.	Generally increasing therefore improving.
(CPP) Number of school travel plans that have been implemented. This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.	BHCC Transport Planning and Policy Team.	100% of LEA funded schools have a school travel plan (2011/12) 67 schools have travel plans (07/08) (71%)		Improving

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development				
Indicator	Source	Data	Comparison/target	Trend
Number of cycle journeys in the city	BHCC Full Local Transport Plan 2006/07- 2010/11 BHCC Local Transport Plan Progress Report 2008	No. of cycling trips: 2007: 14,000	Target: Increase cycling trips by 5% per year to 16,100 by 2010. 2003/04: baseline data- 4146 recorded cycling trips	Unknown but considered to be increasing.
(CPP) Pedestrian movements This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.		Results for this are currently being collated.		
(CPP) NI 167 Congestion – average journey time per mile This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.	LAA 08-11	08-09: 3min26 07-08: 3min45	LAA target to maintain 3 minute per mile rate. No equivalent target as such in Sustainable Community Strategy. Awaiting finalised CPP for further targets.	Insufficient data
(LOI) Amount of developments that have been defined by the Government & Transport Planning as needing a Transport Assessment, to have done so.	BHCC Authority Monitoring Report	100% (2010/11) 100% (2009/10) 100% (2008/09) 100% (2007/08) 100% (2006/07)	Target: 100%	No measurable trend as such.
(SC) Percentage of residential or mixed use development within 500m of a bus stop or rail station.	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	
(SC) Percentage of residential or mixed use development that ensures that all vehicle infrastructure is in accordance with Manual for Streets guidance	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development

Indicator	Source	Data	Comparison/target	Trend
(LOI) Amount of major commercial development and those considered to have transport implications to have travel plans or other measures to maximise the use of sustainable modes of transport.	BHCC Authority Monitoring Report (2010/11)	2010/11 90% (9 out of 10). One application did not have a travel plan as the development will be included in the travel plan of the RSCH. 2009/10 - 87% (7 out of 8). One application was exempted as there was a substantial extant consent and a large element of like for like replacement in the proposal. 2008/09 - 100% 2007/08 - All but 2 applications from April 2007 to March 2008 contained a Travel Plan and/or other sustainable modes measures. Of these 2 applications, 1 addressed the transport issues in the Planning Statement. 2006/07- 100%	Target: 100%	No measurable trend as such.
NI 175: Access to frontline health services within 15-30 minutes by public transport (under review under LTP3)	http://www.places.communities.gov.uk/NewsPages/News_Documents/HubDownloadOct2010.xls	Proportion of population within 10 minutes access of a GP surgery by PT and walking in off-peak hours (10:00-16:00): - 08/09: 89% - 07/08: 91%	<u>LAA targets</u> (refreshed 2010): 08/08: 92% 09/10: 93% 10/11: 95% This indicator is under review under LTP3.	Insufficient data
Estimated traffic flows for all vehicle types (million vehicle miles)	State of the Environment Report 2012	2009: 876 m miles 2008: 889 m miles 2007: 905 m miles 2006: 900 m miles	National mean: 2904.43 million vehicle kms in 2005. Comparisons with other areas: - Bristol City Council: 2188 - Bournemouth Borough Council: 810	Miles generally reducing therefore showing an improvement, however may fluctuate.
(CPP) Car club usage in Brighton & Hove This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.	State of the Environment Report and LTP3	(March 2011) 2910 registered members 8- vehicles available 2 car clubs	No target as such	Number of members increasing.
(SC) Percentage of developments where parking is provided for Car Club	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development

Indicator	Source	Data	Comparison/target	Trend
(SC)Percentage of developments where parking is provided for Cycle parking	Sustainability Checklist	For those approved applications with a submission of the new Sustainability checklist; 76% of new approvals will provide cycle parking and 36% of completed developments provided cycle parking. 86% of new build approvals will provide cycle parking 50% of completed new builds provided cycle parking.	No national targets as such.	
Increase in cycle parking / improvements across the city?	BHCC Transport Team	Under the LTP, there is a commitment to install 80 additional Sheffield stands per year. However, actual numbers likely to be significantly more due to cycle parking installed as part of BHCC Staff Travel, Business Travel Planner (installing cycle stands at largest 30 employers in B&H), Bike IT officer (installing cycle parking at Bike IT schools -10 different schools per school year), Highways Operations (installing cycle stands instead of bollards in some cases), Development Control (ensuring cycle parking is included in new developments).	Target to install 80 Sheffield Stands per year in Brighton & Hove. No national comparison.	No measurable trend as such.
% of the resident population who travel to work by (a) private motor vehicle (car, taxi or motorbike) (b) public transport (c) on foot or cycle	(Census data 2001)	a) 49.4% b) 21.0% c) 19.8%	National data: a) 65.9 b) 9.4 c) 12.6 (Census data 2001)	Insufficient data
% of the resident population travelling over 20 km to work	(Census data 2001)	17.0%		Insufficient data
The proportion of new development meeting its travel plan objectives.	Data under collection			
The effectiveness of travel plans at employment sites	Data will be collected by Itrace	Data will be collected by Itrace		

7. Minimise the risk of pollution to water resources in all development				
Indicators	Source	Data	Comparison/target	Trend
No. of potentially contaminated sites which have been classified as HIGH priority and will require further investigation as part of the City Council's Contaminated Land strategy.	BHCC Environmental Health	07/08 The council has 2863 sites for potentially contaminated land. These have been prioritised on a risk basis into five categories, with A being the highest and E the lowest A's = 3 sites. Nb. The council no longer collects this date as this indicator relates to former Best Value Performance Indicators.	No Data	Insufficient data
Water resource supply / demand balance	Water Resources Management Plan 2010-2035	During 2010/11 the Brighton area was considered to be in water deficit, but due to decreasing demands (though for example, water metering) and improvements (i.e. reducing leakage) it is considered that we will have surplus water until the planning period (of Southern Water's 2010-2035 Management Plan) ends in 2035.	The South East is reliant on groundwater for up to 70 per cent of its public water supply. The region consumes more water per person than most other UK regions, but receives one of the lowest amounts of rainfall. 2008 National average consumption ranged from 107 litres per person per day to 176 litres per person per day. Defra aspiration to reduce to an average of 120-130 litres per person a day by 2030 (Defra, Future Water , 2008).	Situation worsening in the short-term, but predicted to improve in the long term.

7. Minimise the risk of pollution to water resources in all development				
Indicators	Source	Data	Comparison/target	Trend
Brighton & Hove bathing water quality	http://www.environment-agency.gov.uk	As of 2011, monitoring reflects requirements of the amended Bathing Waters Directive. Brighton Central: 2012: Higher 2011: Higher* 2010: Good; 2009: Excellent; 2008: Excellent Hove: 2012: Higher 2011: Higher 2010: Good; 2009: Excellent; 2008: Good Kemp Town: 2012: Higher 2011: Higher 2010: Good; 2009: Good; 2008: Good * Higher means the bathing water meets the criteria for the stricter UK guideline standards of the Directive	N/A	Generally improving over time.
Status of the groundwater resource as measured by the requirements of the Water Framework Directive.	http://www.environment-agency.gov.uk http://publications.environment-agency.gov.uk/PDF/GEHO0309BPSZ-E-E.pdf State of the Local Environment Report 2011	2011: Overall Status = Poor Chemical Status = Good Quantitative Status = Poor (no change from 2009)	All bodies of water must aim to reach "good" standard by 2015 (Water Framework Directive).	No change in recent years.
(SC) Percentage of new developments incorporating SUDs within the development area and/or beyond the development area.	Sustainability Checklist	For those approved applications with a submission of the new Sustainability checklist; 12 (55%) Sustainable drainage systems to be incorporated into approved new build developments 2011/12. 0 beyond development area. 1 (50%) on completed new build	No national targets as such.	

7. Minimise the risk of pollution to water resources in all development				
Indicators	Source	Data	Comparison/target	Trend
Area of city at risk from flooding (non-tidal)	Strategic Flood Risk Assessment (October 2011)	Surface water: risk due to highly urbanised nature of city; 35,600 properties at risk of surface water flooding (of <1m) Groundwater: the majority of the city is considered to be at low risk. Fluvial: no areas at risk of flooding from main rivers or ordinary watercourses.	Ground water flooding, surface water flooding, flooding from sewers and flooding from run-off from agricultural land following periods of high rain fall have all occurred in the city within the last 10 years.	No measurable trend as such.
(SC) Number of units designed to deliver estimated water usage patterns of: - 105 litres/person/day (equivalent to Code Levels 3 & 4) - 80 litres/person/day (equivalent to Code Levels 5 & 6)	Code for Sustainable Homes ratings, monitored via Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.		

8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.				
Indicators	Source	Data	Comparison/targets	Trends
(SC) Percentage of developments incorporating measures to reduce consumption of water.	Sustainability Checklist	For those approved applications with a submission of the new Sustainability checklist; 36% approved applications in 2011/12 indicated they would incorporate measures to reduce water consumption (68% New Build) and 18% of completed development (100% new Build)	No national targets as such.	
Proportion of properties with water meters installed	State of the Local Environment Report 2011	2009/10 – approximately 40% 2005/06 – approximately 30%	Overall 40% of Southern Water customers are metered (Southern Water,	Generally increasing over time, therefore situation improving.
Domestic consumption of water	State of the Local Environment Report 2011	2009/10 – 150 litres per household per day 2005/06 – 157 litres per household per day	The South East is reliant on groundwater for up to 70 per cent of its public water supply. The region consumes more water per person than most other UK regions, but receives one of the lowest amounts of rainfall. 2009/10 (south east) 156l 2009/10 (UK) 149	Generally decreasing over time, therefore situation improving.

9. To promote the sustainable development of land affected by contamination				
Indicators	Source	Data	Comparison/target	Trend
Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act.	Environmental Health Team	The first years data will be collected in 2013/2014	No target as such	

9. To promote the sustainable development of land affected by contamination				
Indicators	Source	Data	Comparison/target	Trend
<p>Number of redevelopment proposals resulting in the investigation / remediation of contaminated sites?</p> <p>NB: this indicator will no longer be collected and will be replaced by the first indicator in following reports</p>	BHCC Authority Monitoring Report 2010/11	<ul style="list-style-type: none"> - 2010/11: 43 conditions applied requiring investigation of potentially contaminated land - 2009/10: 72 conditions applied to new planning applications requiring investigation of potentially contaminated land. - 2008/09: 60 planning applications recommended with potential for remediation of contaminated land. 	None at present (Comparators and targets should be linked directly to the number of redevelopment proposals on contaminated sites).	No measurable trend as such
<p>No. of sites designated as Contaminated Land (as defined [in Contaminated Land Strategy])?</p> <p>NB: this indicator will no longer be collected and will be replaced by the first indicator in following reports</p>	BHCC Environmental Health	<p>07/08</p> <p>The council has 2863 sites for potentially contaminated land.</p> <p>Nb: The council no longer collects this information which is a former Best Value Performance Indicator, therefore no further updates can be reported.</p>	No target or comparison as such.	No measurable trend as such.

10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.				
Indicators	Source	Data	Comparison/target	Trend

10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.				
Indicators	Source	Data	Comparison/target	Trend
What parts of the coast are protected in Brighton & Hove?	www.brighton-hove.gov.uk	The main geological interest on Brighton & Hove's coastline is the chalk cliff line to the east of Black Rock. The "Brighton to Newhaven Cliffs" are designated a Site of Special Scientific Interest (SSSI), a Regionally Important Geological Site (RIGS) and a Geological Conservation Review site (GCR). Black Rock Beach is designated as a SNCI, which is colonised by sea cabbages and other vegetated shingle species. This is identified as a BAP habitat. Vegetated shingle is a nationally rare habitat type and is listed on Annex 1 of the EC Habitats Directive as a habitat of international conservation importance.	There are 45 designated Heritage Coasts in England and Wales. The "heritage coast" classification scheme was initiated in 1972 to protect coastline of special scenic and environmental value from undesirable development. Some 31% of the coast in England and 42% in Wales are protected under the heritage coast scheme.	No measurable trend as such.
(E1): The number of planning permissions granted contrary to the advice of the Environment Agency on the grounds of tidal flooding.	BHCC AMR 10/11	2010/11: No comments on flood risk by EA. 2009/10: No comments on flood risk by EA. 2008/09: EA commented on one planning application regarding flood risk with an objection that a Sequential Test had not been demonstrated. The application concerned was subsequently withdrawn.	N/A	No measurable trend as such.
Area of city at risk from tidal flooding?	SFRA 2011	Tidal: areas along the coastal frontage lie within Flood Zones 2 and 3a and 3b. Areas in Portslade are at greatest risk of tidal flooding. Wave over-topping is also a risk in these areas and is considered a material concern along the rest of the coastal frontage. The extent of tidal flooding increases as a result of climate change at the Portslade Harbour area, beach at Palace Pier and at the Marina.	N/A	No measurable trend as such.

11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment

Indicators	Source	Data	Comparison/target	Trend
Level of GVA per head	State of the City Report 2011 (BHCC)	2008/09: £20,659	UK 2008/09 - £21,103	Generally improving although lower than national average.
(BD1): Total amount of additional employment floorspace – by type (gross and net) Employment type is defined by Use Class Orders: B1 (a), (b) and (c), B2 and B8. Floorspace measured in m2. Gross = New floorspace + change of use + conversions. Net = New floorspace – demolitions + change of use + conversions.	BHCC AMR 11/12	11/12: Gross: 38,980 Net: 36,441 10/11: Gross: 7,156m2 Net: 1,767m2 09/10: Gross: Net: 1115m2 08/09: Gross: 12,619m2 Net: 9,446m2	N/A	No discernable trend.
(BD2): Total amount of employment floorspace on previously developed land – by type (expressed as % of BD1 gross figure).	BHCC AMR 11/12	11/12: 100% on PDL 10/11 80% was on PDL. The 20% on Greenfield land was attributable to the completion of the Community Stadium. 09/10 100% of all new employment floorspace was on PDL.		Reduced in recent years although normally trend is static at 100%.

11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment

Indicators	Source	Data	Comparison/target	Trend
(BD3): Employment land available – by type. Employment type is defined by Use Class Orders: B1 (a), (b) and (c), B2 and B8. Land available includes: (i) sites allocated for employment in DPDs and (ii) sites for which planning permission has been granted for employment use, but not included in (i). Expressed in hectares	BHCC AMR 10/11	10/11 – 45.1 hectares available 09/10 – 44.90 hectares available 08/09 – 40.71 07/08 – 40.71		Generally increasing, therefore improving.
(CPP Headline Indicator) Economic benefit of tourism generated annually in Brighton & Hove?	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2010/11: £732 million 2006 – estimated at £408 million	CPP target 2012/13: £746m	Generally increasing therefore improving.
Employment supported by visitor economy in Brighton and Hove	Tourism South East 2010 The Economic Benefit of Tourism in Brighton & Hove	2010: 18,533 jobs supported by tourism expenditure across a range of sectors 2007: estimated at 6,100 jobs		Generally increasing therefore improving.
Amount (£) of developer contributions secured for training for local residents, through the Local Employment Scheme	Planning Strategy Team	2011/12: £157,020		
(CPP Headline Indicator) (NI 177) Reduce the number of young people who are NEET	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2011: 8.4% of young people are NEET	Target to be confirmed	Insufficient data to predict trend.

12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors

Indicators	Source	Data	Comparison/target	Trends
(NI 171) Proportion of VAT registered businesses /10,000 adults in Brighton and Hove	http://www.data4nr.net/resources/economy—enterprise/907/	(2008) 63.3 (data for most recent year) (2007) 69.8 (2006) 69.3	England 2008 57.2 South East 2008 60.0	Has decreased over recent years, therefore worsening.

12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors				
Indicators	Source	Data	Comparison/target	Trends
Percentage population that are in employment?	Nomisweb	2010/11: 75.3% 2008: 74.60% 2007: 73.7% 2006: 75.3% 2005: 74.3% 2004: 75.2%%	National average 2010/11: 76.2%	Fairly static with slight fluctuations representing current economic climate.
How many businesses are EMAS or ISO registered in Brighton and Hove?	http://www.emas.org.uk/	No businesses registered in Brighton & Hove	73 businesses EMAS registered in UK 18 companies ISO registered in UK.	-
NI 152: % of working age population that is claiming out of work benefits	Nomisweb	2010/11 = 12.4% (22,390) 2009 = 13.3% (22,970) 2008 = 21,135 2007 = 21,702	2010/11 UK average: 12.1% The number of people claiming JSA in Great Britain has doubled in the past two years. However, local performance in Brighton & Hove has been better than the national average in terms of percentage increases in JSA claimants, despite starting from a higher baseline. Centre for Cities 2010 puts Brighton in the top ten cities with the lowest levels of inequality (in Nov 09) when looking at claimant counts across the city.	Amount decreasing, thereby signifying an improvement.
(CPP Headline Indicator) NI 075 % of 15yr old pupils in schools maintained by the LA achieving GCSE's at grade A*-C or equivalent?	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	10/11 – 52.6% 08/09 – 44.5% 07/08 – 44.5% 06/07 – 43.5% 05/06 – 41.8%	BH target 11/12: 61.8% Comparison: England 08/09 49.8% South East 08/09 53.7%	Improving.
Levels of Section 106 agreements that have included education facilities across the city?	BHCC Planning Strategy Team	10/11 £304,637 (4 x schemes) 09/10 £210,331 (3 x schemes) 08/09 £148,369 (3 x schemes) 07/08: £72,525 (2 x schemes)	No targets	-
Level of section 106 agreements that have included Public Art in B & H?	BHCC Authority Monitoring Report	Public art contributions secured for major developments as identified in Policy QD6: Number and % 2010/11: 3 schemes (of 8) = 37% 2009/10: 9 schemes; 100% 2008/09: 5 schemes; 100% 2007/08: 10 schemes; 100%	100% of major development as identified in Policy QD6 provide public art through planning obligations	No measurable trend as such.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city

Indicators	Source	Data	Comparison/target	Trends
All age all cause mortality Age standardized rate / 100,000	http://www.apho.org.uk/default.aspx?QN=HP_METADATA&realID=50375	2009 – approx 450 2000 – approx 550	No target as such. National comparison: 2009: approx 650 (estimated from graph)	All age all cause rate generally falling signifying an improvement and better than UK average.
(CPP) Age standardised mortality rates for people aged under 75: <ul style="list-style-type: none"> • All cancers • Circulatory diseases • Suicide <p>This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.</p>	Health Profile Brighton & Hove 2012 (DoH) www.bhlis.org	All cancers Brighton & Hove death rate in people aged less than 75 per 100,000 population 2009: 120.7 2008: 106.41 2007: 129.32 2006: 135.30	UK average 2009 110.1 Targets Brighton & Hove To reduce by 20% death rate in people aged less than 75 years between 1997 and 2010, and by at least 12% in people under 75 by 2005 compared to 1997.	Generally falling therefore signifying an improvement, however still worse than UK average.
	Health Profile Brighton & Hove 2012 (DoH) www.bhlis.org	Circulatory diseases B&H death rate in people aged less than 75 per 100,000 population 2009: 69.6 2008: 71. 2007: 72.09 05/2006: 87.21	Uk average 2009: 67.3 To reduce by 40% death rate from circulatory disease in people aged less than 75 years between 1997 and 2010.	Generally falling therefore signifying an improvement.
	Health Profile Brighton & Hove 2012 (DoH) www.bhlis.org	Suicide directly age-standardise rate in B&H per 100,000 population 06-2008: 14.6 05-2007: 13.8 04-2006: 14.5	Suicide directly age-standardise rate in the South East (2007): 5.65 Target to reduce by 20% (from 1996/97 levels) by 2010.	Fairly static

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city

Indicators	Source	Data	Comparison/target	Trends
Gap between the highest and lowest scoring Super Output Areas, IMD Health, deprivation and disability domain	BHCC Research and Consultation Team.	<p>IMD 2010: Most deprived SOA E01916947 (in Queen's Park ward) = 2.78 (in 10% most deprived in UK) Least deprived SOA E01016983 (in Stanford ward) = -0.61</p> <p>Therefore the gap between the highest and lowest scoring SOA has increased since 2007.</p> <p>IMD 2007: Most deprived SOA E01016942 (in Queens Park ward) = 2.45 (in 10% most deprived in UK) Least deprived SOA E01016983 (in Stanford ward) = -0.84</p> <p>IMD 2004: Most deprived SOA E01016947 = 2.43.</p>	Targets B&H: to reduce health inequalities.	Difficult to compare due to changes in reporting, however the gap between the lowest and highest scoring SOA appears to be increasing signifying that deprivation is worsening.
Life expectancy at birth (years): (a) Males (b) Females	Health Profile Brighton & Hove 2012 (DoH) www.bhlis.org	<p>(2008-2010) (a) 77.7 (b) 83.2</p> <p>(2007-2009) (a) 77.1 (b) 82.5</p> <p>(2006-2008) (a) 76.6 (b) 82.5</p> <p>(2005-2007) (a) 76.1 years (b) 81.3 years</p>	Uk average 2008-2010: Men – 78.6 Women 82.6	Generally improving locally, although life expectancy for men is lower than the UK average.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city

Indicators	Source	Data	Comparison/target	Trends
Infant mortality rate: deaths up to 1 year per 1000 live births	Health Profile Brighton & Hove 2012 (DoH)	2008-2010: 4.7/1000 births (2007-2009) 5.1/1000 births (2007) 6.2 / 1000 births	There are an average of 440 infant deaths each year in the South East, producing an infant mortality rate of 4.5 per 1000 live births (significantly lower than the England rate of 5.1 per 1000 live) ((2007)	Generally improving.
(CPP Headline Indicator) NI055 Obesity among primary school children in year 6 and obesity in children in reception class.	LAA Performance Report 2008/09 Health Profile Brighton & Hove 2011 (DoH) City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	(10/11) Year 6 children: 15.2% (10/11) Reception children 8.2% (09/10) Year 6 children: 15.5% (09/10) Reception children: 8.4% 2008 Baseline: 17.7%	Targets in line with previous NHS vital signs strategy: 11/12 – 8.4% reception, 17.4% yr 6.	No discernable trend
(SC) Percentage of development incorporating provision for food growing	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	
NI 175: Access to frontline health services within 10 minutes by public transport and walking (under review in LTP3)	http://www.places.communities.gov.uk/NewsPages/News_Documents/HubDownloadOct2010.xls	Proportion of population within 10 minutes access of a GP surgery by PT and walking in off-peak hours (10:00-16:00): - 08/09: 89% - 07/08: 91%	LAA targets (refreshed 2010): 08/08: 92% 09/10: 93% 10/11: 95%	Insufficient data.
(SC) Percentage of developments incorporating the provision of on site outdoor space.	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	
(CPP) (N18) Adult Participation in Sport This is not a headline indicator in the CPP but is part of larger suite of indicators that will monitor performance in the city.	LAA Performance Report 08/09	08/09 = 22.70 More recent results will be reported in the forthcoming CPP results.	Target 08/09 = 25.40%	Insufficient data.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city

Indicators	Source	Data	Comparison/target	Trends
% of the resident population who travel to work by a) private motor vehicle (car, taxi or motorbike) b) public transport c) on foot or cycle	(Census 2001 data)	a) 49.4% b) 21.0% c) 19.8%	National averages: a) 65.9 b) 9.4 c) 12.6	Insufficient data.
% of the resident population travelling over 20 km to work	(Census data 2001)	17.0%		Insufficient data.
Number of people on the housing register?	http://www.communities.gov.uk/documents/housing/xls/2039614.xls	2010/11 10,852 (equivalent to 9.3% of all households) 2008 – 10,988	No data	Little change over recent years
(CPP Headline Indicator) NI112 Under 18 conception rate	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2009: 36.5 2008:36.0 conceptions per thousand females aged 15 to 17	CPP targets: Target is taken from the NHS Vital Signs strategy (a 45% reduction from the baseline result of 48.1 in 1998). 11/12 target = 26.5	Achieved a 26% decrease since 1998 therefore situation significantly improved.
Number of 'Warm Front' grants made to people - Measured as the rate per 1000 people and the proportion given to people aged over 60	http://www.eaga.com/downloads/pdf/Eaga_Fuel_Poverty_Report.pdf	07/08 – 1,103 grants awarded (total funding awarded = £1,052,295) No further updates are available	UK Fuel Poverty Strategy target involved helping 800,000 households through Warm Front by 2010.	No measurable trend as such.
(CPP Headline Indicator) (NI 39) Alcohol-harm related hospital admission rates.	APHO Brighton & Hove Health Profile 2012 City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	10/11 = 1,987 09/10 = 1,818 08/09 = 1,809 (per 100,000 population)	UK average 2010/11 - 1895	Appears to be increasing therefore worsening.
(CPP) (NI51) Effectiveness of child and adolescent mental health. This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city. Results currently being collected.	LAA 08-11 LAA Performance Report 08/09 http://www.data4nr.net/introduction/	09/10 = 16 08/09 = 16	08/09 = target 16 (16 is the highest score showing full compliance with criteria)	Insufficient data to compare.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city

Indicators	Source	Data	Comparison/target	Trends
(NI 59) Initial assessments for children's social care carried out within 7 days of referral.	LAA 08-11 LAA Performance Report 08/09 http://www.data4nr.net/introduction/	2008/09 = 89.8% 2006/07 = 56%	Target of 76% in 2008/09 77% 09/10 78% 10/11	Little data but appears to be improving.
(CPP Headline Indicator) (NI 123) Smoking prevalence in adults (4 week quitters)	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	10/11 = 1081 08/09 = 923.60	Approx 24% of population smoke compared to UK average of 20% (APHO Health Profile 2012) CPP Targets: 11/12 – 2,350	Little data but appears to be improving.
(CPP Headline Indicator) (NI 130) % Social Care clients receiving self directed support	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	10/11 40%	Targets: 11/12 – 45%	Insufficient data.
(CPP) (NI 135) Carers receiving needs assessment or review This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.	LAA 08-11 LAA Performance Report 08/09	2008/09 = 18.20% 12% (2006/07) Further results currently being collected.	Targets: 16% 08/09 19% 09/10 22% 10/11	Insufficient data.
(CPP) (NI 146) Adults with learning disabilities in employment This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.		Results currently being collected.		
(CPP) (NI 150) Adults in contact with secondary mental health services in employment. (per 100,000) This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city. .	LAA 2008-11 LAA Performance Report 08/09	2008 /09 = 8.90 Further results currently being collected		

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city				
Indicators	Source	Data	Comparison/target	Trends
Level of road traffic-related noise at key junctions	DEFRA noise mapping website (2009)	Levels measured at over 75 decibels at various places including: A259 junction with Palace Pier Large expanses of A259 between Pier and Portslade Junction with Victoria Gardens (A23) Vogue Gyratory System – Lewes Road Large expanses of Lewes Road Preston Circus junction – London Road Large expanses of London Road Old Shoreham Road at various junctions including Sackville Road and Hangleton Link Road junctions Large expanses of Old Shoreham Road	No targets as such.	Insufficient data.

14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects				
Indicators	Source	Data	Comparison/targets	Trends
Levels of Section 106 agreements that have included new GP facilities in the City?	BHCC Planning Strategy Team	10/11: none 09/10: none 08/09: none 07/08: 1 agreement.	No targets	No measurable trend as such.
N1 175: Access to frontline health services within 10 minutes by public transport and walking (under review in LTP3)	www.places.communities.gov.uk/NewsPages/News_Document/HubDownloadOct2010.xls	Proportion of population within 10 minutes access of a GP surgery by PT and walking in off-peak hours (10:00-16:00): - 08/09: 89% - 07/08: 91%	LAA targets (refreshed 2010): 08/08: 92% 09/10: 93% 10/11: 95%	Insufficient data.
(CPP) Number of total police recorded crimes? (Offences per 1.000 population)	BHCC Community Safety Team www.safeinthecity.info City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2010/11: 24,052 crimes reported 2009/10: 24,384 2007/08 B&H 27,560 crimes were reported to the police in 2007/08 2003-04 B&H: 29,897 crimes recorded by the police in Brighton & Hove in 2003/04	Targets: CPP – To achieve a 3% reduction from the 2009 baseline. 2010/11 saw a 1.4% reduction. 2003-04 England & Wales: 28.2 Portsmouth: 36.6 Bristol: 28.2	Generally reducing therefore situation improving.

14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects				
Indicators	Source	Data	Comparison/targets	Trends
Number of new developments incorporating Secured by Design features	AMR	08/09 indicates that 100% of large scale development proposals demonstrate how crime prevention proposals have been incorporated.	None as such	No measurable trend as such.
(CPP Headline Indicator NI47) People killed or seriously injured in road traffic accidents.	LAA 08-11 City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2010/11 = 136 2008/09 = 141 (55.5/100,000 pop) 2005-2007 average: 165	CPP Target: 2011/12: 146 UK 2008/09 = 44.3/100,000 pop	Appears to be reducing therefore situation improving.
WTE GPs per 1000 population	Brighton & Hove PCT	0.53 WTE GPs per 1,000 population (2010)	No known targets	Insufficient data
(CPP Headline Indicator) The percentage of residents surveyed who said they feel 'fairly safe' or 'very safe' outside in their area: a) during the day; and b) b) after dark.	www.bhlis.org City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2007/08 – a) 98.4% b) 72.17% 2005/06: a) 98.1% b) 71.7% Results currently being collated via CPP	The national mean 2005/06: a) 97.24% b) 70.18% This information has previously been collected in postal surveys such as the Place Survey. It will now be collected through the council's 'Citytracker' telephone survey. This will mean previous data will not be comparable to newly collected data.	Little change

15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.				
Indicators	Source	Data	Comparison/target	Trends
Gap between the lowest and highest scoring SOA in the education, skills and training domain of IMD.	BHCC Research & Consultation Team	<p>IMD 2010: Most deprived SOA E1016866 (East Brighton) 88.03 Least deprived SOA E1017001 (Withdean) = 0.68</p> <p>Overall the gap has decreased very slightly (Gap in 2010 is 87.35, in 2007 it was 87.58)</p> <p>IMD 2007: Most deprived SOA E01016915 (Moulsecoomb & Bevendean ward) 88.48. Least deprived SOA E01017001 (Withindean ward) = 1.00</p> <p>IMD 2004: Most deprived SOA = 87.51. Therefore deprivation in this domain has increased.</p>	To reduce the gap between the 119 most deprived wards and the rest of the region by 10% as measured by the Index of Local Deprivation by 2010.	Little change over time.
(CPP Headline Indicator) (NI 177) Reduce the number of young people who are NEET	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2011: 8.4% of young people are NEET	Target to be confirmed	Insufficient data for comparison.
NI 152: % of working age population that is claiming out of work benefits	Nomisweb	<p>2010/11 = 12.4% (22,390)</p> <p>2009 = 13.3% (22,970)</p> <p>2008 = 21,135</p> <p>2007 = 21,702</p>	<p>2010/11 UK average: 12.1%</p> <p>The number of people claiming JSA in Great Britain has doubled in the past two years. However, local performance in Brighton & Hove has been better than the national average in terms of percentage increases in JSA claimants, despite starting from a higher baseline</p>	Fairly static.

15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.				
Indicators	Source	Data	Comparison/target	Trends
Proportion of adults with poor literacy and numeracy skills	http://www.dfes.gov.uk/readwri-teplus_skillsforlifsurvey/statics/la00ML_0.shtml And http://www.dfes.gov.uk/readwri-teplus_skillsforlifsurvey/statics/gorJ_1.shtml And http://www.dfes.gov.uk/readwri-teplus_skillsforlifsurvey/statics/gorJ_1.shtml	2005 Literacy - B&H: Entry Level 1 Skills: 0% Entry Level 2 Skills: 7% Entry Level 3 Skills: 7% Level 1 Skills: 43% Level 2 Skills: 50% 2005 Numeracy - B&H: Entry Level 1 Skills: 2% Entry Level 2 Skills: 11% Entry Level 3 Skills: 24% Level 1 Skills: 40% Level 2 Skills: 24% <i>No further updates available</i>	2005 Literacy - South East: Entry Level 1 Skills: 2% Entry Level 2 Skills: 1% Entry Level 3 Skills: 8% Level 1 Skills: 37% Level 2 Skills: 51% 2005 Numeracy - England: Entry Level 1 Skills: 4% Entry Level 2 Skills: 12% Entry Level 3 Skills: 24% Level 1 Skills: 27% Level 2 Skills: 32%	Insufficient data for comparison.
% of the population living in the 20% most deprived super output areas in the country	IMD2010	22.8% (Based on 2008 population estimates and calculated as sum of all individuals living in 20% most deprived SOAs in the country.) 2004: 22%	National average: 14.26%	Little change from 2004 (although difficult to compare due to change in reporting)
% of the population over 60 who live in households that are income deprived	IMD 2010	Based on 2008 population estimates and IMD2010 = 22.30% 17.9% (2004)	National average: 13.88%	Situation worsening (although difficult to compare due to change in reporting)
(CPP Headline Indicator NI 116: % of children under 16 living in households in receipt of out of work benefits	http://www.hmrc.gov.uk/stats/personal-tax-credits/cps-la09.xls LAA 08-11 LAA Performance Report 08/09	2009: 22% 2008: 21% 2007: 20%	Targets: 08/09: 19% 09/10: 18% 10/11: 17% England/Wales average 2009 = 22%	Worsening over time.
CPP Headline Indicator (NI187) Tackling fuel poverty – people receiving income based benefits living in homes with a low energy efficiency rating. NB: new indicator being developed by DECC to replace this.	http://www.decc.gov.uk/assets/decc/11/stats/fuel-poverty/3617-fuel-poverty-2009-subregional-data.xls LAA 08-11 LAA Performance Report 08/09	2009/10 = 12.2% 2008/09 = 12.94%	08/09 = 13% South East Average 2009/10 = 11.8%	Little change over time.

15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.				
Indicators	Source	Data	Comparison/target	Trends
(CPP Headline Indicator) (NI158) % non-decent council homes	LAA 08-11 City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2010/11 = 26% 2008/09 = 48.89% 2007/08 – 56.6%	Target: 2011/12 – 12% Target for all to be decent standard by December 2013	Generally improving over time.
(CPP Headline Indicator) NI 075 % of 15yr old pupils in schools maintained by the LA achieving GCSE's at grade A*-C or equivalent?	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	10/11 – 52.6% 08/09 – 44.5% 07/08 – 44.5% 06/07 – 43.5% 05/06 – 41.8%	BH target 11/12: 61.8% Comparison: England 08/09 49.8% South East 08/09 53.7%	Generally improving over time.
(CPP Headline Indicator) NI112 Under 18 conception rate	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2009: 36.5 2008:36.0 conceptions per thousand females aged 15 to 17	CPP targets: Target is taken from the NHS Vital Signs strategy (a 45% reduction from the baseline result of 48.1 in 1998). 11/12 target = 26.5	Achieved a 26% decrease since 1998 therefore situation significantly improving.
Number of council tax benefits claims city-wide	Business Performance Team BHCC	2010/11 = 27,944 2008/09 = 26,190	No targets as such	Generally increasing.
Number of housing benefit claims city wide	Business Performance Team BHCC	2010/11 = 27,835 2008/09 = 26,803	No targets as such	Generally increasing.

16. To engage local communities in the planning process.				
Indicators	Source	Data	Comparison/target	Trends
How are communities involved in the planning process?		The LDF includes A 'Statement of Community Involvement' (Oct 2006), which explains how the public can participate during the different stages of the LDF preparation. Consultation taken place on preparation of a number of SPDs and the City Plan.	The LDF has to include A 'Statement of Community Involvement' this will explain how the public can participate during the different stages of the LDF preparation. No Targets	No measurable data as such.
(CPP) (NI004) % of people who feel they can influence decisions in their locality This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.		Results currently being collected		

17. To make the best use of previously developed land				
Indicators	Source	Data	Comparison/targets	Trends
(BD2): Total amount of employment floorspace on previously developed land – by type (expressed as % of BD1 gross figure).	BHCC AMR 11/12	100%	N/A	Little change over time.
H3: New and converted dwellings on PDL	BHCC AMR 11/12	11/12 = 91.5%	N/A	Little change over time.

17. To make the best use of previously developed land				
Indicators	Source	Data	Comparison/targets	Trends
Losses of employment land in (i) development /regeneration areas and (ii) local authority areas	BHCC	There was no employment land lost in (i) regeneration areas and (ii) LA area	Core output indicator, no targets outlined	No change from previous years.
Proportion of developed land that is derelict	http://www.areaprofiles.audit-commission.gov.uk/(0ylyqqaad04b3zfaepn23345)/DataProfile.aspx and The Environment Agency	0.1% (2006) 0.1% (2005) 0.1% (2004) No further updates available	No national comparison, The Government has a target for 60% of new homes and conversions in England to be on previously developed land by 2008	No change over time.
Percentage of development situated on Greenfield land.	AMR 2011/12	11/12 1.3% Non-residential and 10.7% residential completed on Greenfield land.	No targets as such.	Insufficient data for comparison.

18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings				
Indicators	Source	Data	Comparison/target	Trend
<p>(CPP) Average annual domestic consumption of gas and electricity in kWh (Gas = kwh per meter) (Elec = Kwh per consumer)</p> <p>This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.</p>	www.decc.gov.uk	<p>Gas</p> <p>2010 – 13,461 (kwh per meter) 2009 – 13,243 2007 - 15,320 2006 – 16,005 2005 – 16,667 2004 – 18,178</p> <p>Elec</p> <p>2010 – 3815 (kwh per consumer) 2009 - 3824 2007 – 4029 2006 – 4115 2005 – 4161 2004 – 4243</p>	<p>Gas</p> <p>2009 Great Britain: average domestic consumption (sales per meter) 15383 kWh</p> <p>Electricity</p> <p>2010 Great Britain: average domestic consumption (sales per consumer) 4,148 kWh</p>	Overall domestic electricity and gas consumption is decreasing, although a slight increase in gas consumption during the last monitoring period.
<p>(CPP) Average annual consumption of gas and electricity (commercial and industrial)</p> <p>This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.</p>	www.decc.gov.uk	<p>Gas</p> <p>2010 = 388,277 (kwh per meter) 2009 = 364,752 2008 = 349,670 2007 – 320,373</p> <p>Elec</p> <p>2010 = 41,246 (kwh per consumer) 2009 = 41,078 2008 = 41,795 2007 = 41,355</p>	No targets as such	Consumption of gas generally increasing, consumption of electricity showing little change over time.
<p>(CPP Headline Indicator) NI 186: Per capita reductions in CO2 emissions in the LA area (domestic)</p>	http://www.decc.gov.uk/en/content/cms/statistics/indicators/ni186/ni186.aspx	<p>Per capita total CO2 emissions:</p> <p>2010: 5.0kt/capita 2009: 4.8kt/capita 2008: 5.3 kt/capita 2007: 5.5 kt/capita 2006: 5.6 kt/capita 2005: 5.7 kt/capita</p>	<p>England average 2009: 6.1 kilo-tonnes per capita (total emissions)</p> <p>Sustainable Community Strategy (SCS) target reductions in city CO2 'direct' emissions from 2005 baseline:</p> <ul style="list-style-type: none"> - 12% by 2012/13 - 42% by 2020 - 80% by 2050. <p>(SCS 2010)</p> <p>Results for 2009 are equivalent to a 15.64% reduction from the 2005 baseline. (CPP Target Setting Cabinet Report Appendix)</p>	Overall, emissions decreasing although an increase in last monitoring period.

18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings				
Indicators	Source	Data	Comparison/target	Trend
Percentage increase in home energy efficiency	12 th HECA Progress Report (2008) (Last report)	23.29% over first twelve years of fifteen-year programme.	30% increase in home energy efficiency over fifteen years. The average energy efficiency (SAP rating) of new homes in England was 79.0 in the March quarter 2010.	No measurable data as such.
(SC) Percentage of developments with low and zero carbon (LZC) technologies proposed	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	
(E3): Renewable energy generation (mw) from: Wind: onshore Solar photovoltaics Hydro Biomass: Landfill gas Sewage sludge digestion MSW combustion Co-firing of biomass with fossil fuels Animal biomass Plant biomass	AMR 201/12	Of the 76 applications, approved in 2011/12, indicating in their sustainability checklist they propose low and zero carbon (LZC) technologies, 12 disclosed installed capacity the low and zero carbon technologies are estimated to provide, by technology; Air source heat pumps 16KW, Biomass or Biodiesel Boiler 25KW Efficient Gas Boiler (amount unknown) Gas CHP 30KW Solar Voltaics (amount unknown).	No target as such.	Insufficient data for comparison.

19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events				
Indicators	Source	Data	Comparison/targets	Trends
(SC) Percentage of developments incorporating green walls and/or and green roofs.	Sustainability Checklist 2011/12	11 (14.5%) developments with a submission to the new sustainability checklist and approved in 2011/12 included a green roof or a green wall.	No national targets as such.	
Amount of contributions made to the sustainable buildings fund through Section 106 agreements?	BHCC Planning Strategy Team	10/11 none 09/10 £100,000 (1 x scheme) 08/09 None 07/08 None	No targets	Insufficient data for comparison.
(E1): The number of planning permissions granted contrary to the advice of the Environment Agency on the grounds of tidal flooding.	BHCC AMR 10/11	2010/11: None	N/A	No measurable trend as such.

19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events				
Indicators	Source	Data	Comparison/targets	Trends
(CPP Headline Indicator (NI 188) Planning for Climate Change Adaptation	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	No results available	The work plan to improve planning for climate change is not confirmed. A target can not be identified until this has been done	

20. To encourage new developments to meet Code for Sustainable Homes/BREEAM 'Excellent' standard				
Indicators	Source	Data	Comparison/target	Trend
<p>(SC) Amount of the following:</p> <p>a) Number (and %) of small scale new build committing to Level 3 CSH</p> <p>b) Number (and %) of medium scale new build residential committing to Level 3 CSH</p> <p>c) Number (and %) of medium scale new build non-residential committing to BREEAM "very good"</p> <p>d) Number (and %) of major new build residential committing to Level 4 CSH</p> <p>e) Number (and %) of major new build non-residential committing to BREEAM "excellent"</p> <p>Exceedences of current B&H minimum Code level requirements:</p> <p>f) Number (and %) of residential developments (all sizes) meeting Level 5 CSH</p>	Sustainability Checklist	<p>For applications approved between 24 Sep 2008 and 30 Nov 2010 (source B&H Sustainability Checklist monitoring):</p> <p>a) Small scale new build committing to Level 3 CSH: 57 (66% of all 87 small approved applications).</p> <p>b) Medium scale new build residential committing to Level 3 CSH: 28 (82% of all 34 medium scale approved applications).</p> <p>c) Medium scale new build non-residential committing to BREEAM "very good": Not known at present, as validation requirement currently only covers residential development.</p> <p>d) Major new build residential committing to Level 4 CSH: 6 (75% of all 8 major approved applications).</p> <p>e) Major new build non-residential committing to BREEAM "excellent": Not known at present, as validation requirement currently only covers residential development.</p> <p>f) 8 developments for Level 5 CSH. 1 x medium-sized development (2.9% of all 34 medium scale approved applications), 7 x small developments (8% of all 87 small approved applications).</p>	<p>Current B&H minimum requirements are as set out in (a) – (e) in the indicator column (derived from standards set out in SPD08 Sustainable Building Design)</p> <p>National statistics:</p> <p>A total of 89% of the certificates at design stage and 90% of those at post construction stage have been awarded at Code level 3 since April 2007.</p> <p>A total of 7% of the certificates at design stage and 6% of those at post construction stage have been awarded at Code level 4 since April 2007 (House Building: March Quarter 2010, England).</p>	

20. To encourage new developments to meet Code for Sustainable Homes/BREEAM 'Excellent' standard				
Indicators	Source	Data	Comparison/target	Trend
(SC) Percentage of applications submitting a sustainability checklist	Sustainability Checklist	% of full, outline and extension of time limit applications for all types of development submitting a sustainability checklist: - For all applications registered between 24 Sep 2008 and 30 Nov 2010: 31%	- Current requirement is submission of a sustainability checklist with full, outline and extension of time limit applications for residential new build and conversions (SPD08 Sustainable Building Design) - Aspiration is to secure submission of a sustainability checklist with full, outline and extension of time limit applications for all types of development (Planning Projects Team)	

21 To promote and improve integrated transport links and accessibility				
Indicator	Source	Data	Comparison/target	Trend
(SC) Percentage of developments that allow good, safe and direct access between the development and local schools, employment, shops, GP surgeries and leisure facilities	Sustainability Checklist	For those approved applications with a submission of the new Sustainability checklist; 88% of new approvals will provide cycle parking and 82% of completed developments allow good safe and direct access between the development and local schools, employment, shops GP surgeries and leisure facilities.	No national targets as such.	
N1 175: Access to frontline health services within 15-30 minutes by public transport (under review in LTP3)	www.places.communities.gov.uk/NewsPages/News_Document/HubDownloadOct2010.xls	Proportion of population within 10 minutes access of a GP surgery by PT and walking in off-peak hours (10:00-16:00): - 08/09: 89% - 07/08: 91%	LAA targets (refreshed 2010): 08/08: 92% 09/10: 93% 10/11: 95%	Insufficient data.
(SC) Percentage of development incorporating provision for food growing.	Sustainability Checklist	Data from the new Sustainability Checklist will be collected and collated in April 2013.	No national targets as such.	

% of the resident population who travel to work by a) private motor vehicle (car, taxi or motorbike) b) public transport c) on foot or cycle	(Census data 2001)	a) 49.4% b) 21.0% c) 19.8%	National data: a) 65.9 b) 9.4 c) 12.6 (Census data 2001)	Insufficient data
% of the resident population travelling over 20 km to work	(Census data 2001)	17.0%	National data: 17.8% (Census data 2001)	Insufficient data

22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these.				
Indicator	Source	Data	Comparison/target	Trend
How many businesses are EMAS or ISO registered in Brighton and Hove?	http://www.emas.org.uk/	2012 - No businesses registered in Brighton & Hove	73 businesses EMAS registered in UK 18 companies ISO registered in UK.	Insufficient data
Municipal Solid Waste (MSW) (Brighton & Hove) (tpa)	AMR 10/11 (Brighton & Hove only) Waste Management Strategy	106,941tpa (10/11) 109,195 tonnes per annum (09/10) 108,605 tonnes per annum (08/09) 381,615 tonnes per annum (07/08) 390,000 tonne per annum (06/07)	Targets for MSW reduction (from 421kg/head baseline 2008/09): 2012/13: 415 2013/14: 402 2014/15: 383	Fluctuating data makes comparison difficult, however generally appears to be reducing.
Commercial & Industrial Waste (Brighton & Hove & East Sussex) (tpa)	East Sussex County Council AMR 2010/11	475,000 tonnes per annum	Actual figures for C&I waste are difficult to obtain as it is commercially sensitive.	Insufficient data
Construction & Demolition Waste (Brighton & Hove and East Sussex) (tpa)	East Sussex County Council AMR 2010/11	906,000 tonnes per annum	Actual figures for C&D waste are difficult to obtain as it is commercially sensitive.	Insufficient data
(CPP Headline Indicator) Residual household waste per household	City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	605 (10/11) (Previous data cannot be directly comparable as was waste per head) 421 (08/09) 433.81 (06/07) 437.2 (05/06) 452.7kg (04/05)	CPP target = 602kg for 2012/13	Insufficient data for comparison due to change in reporting

22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these.

Indicator	Source	Data	Comparison/target	Trend
(CPP Headline Indicator) (NI192) % of household waste (a) recycled (b) composted (c) used to recover heat, power, and other energy sources.	BHCC City clean AMR 10/11 City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	10/11 a) 23.43% b) 3.47% c) 26.17% 1.01% reused 09/10 (a) 23% (b) 3.9% composted © 27.6% 1.6% reused. 08/09 a. 28.5% recycled b. unknown c. 23.2% 06/07: (a) 23.02% recycled (b) 3.39% composted (c) 2.38% used to recover heat power 05/06: (a) 20.95% recycled (b) 3.56% composted (c) 0.51% used to recover heat power 04/05: (a) 16.23% recycled (b) 3.57% composted (c) 0.00% used to recover heat, power, and other energy sources.	The national statistic shows that 9% is recycled and a further 8% has energy recovered from it. The Government and the National Assembly have set targets to increase the recycling of municipal waste. • To recycle or compost at least 25% of household waste by 2005 • To recycle or compost at least 30% of household waste by 2010 • To recycle or compost at least 33% of household waste by 2015 Sustainable Community Strategy targets: achieve 70% recycling rate for domestic by 2025	Recycling rates have generally increased, composting rates appear fairly static, and energy recovery rates appear to be increasing.

22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these.				
Indicator	Source	Data	Comparison/target	Trend
(SC) Percentage of developments designed with space for storage of recyclable materials.	Sustainability Checklist	Of those submitting entry to sustainability checklist in 2011/12 91% of new build new approvals will be designed with space for storage of recyclable materials and 72% of conversions of those completed in the monitoring year 100% of new builds were designed with space for storage of recyclable materials and no conversions.	No national targets as such.	
No. of recycling points in Brighton & Hove?	BHCC City Clean 11/12	There are 83 public recycling points which have at least paper, glass and cans. 90% of these are on the two stream co-mingled service where the public can recycle paper, cans, card, plastic bottles and aerosols in one bin and mixed glass in another. In addition to this, many of the sites offer recycling for other materials, including 62 sites offering textiles and 23 offering cartons, plus other items such as bras, toys, electrical items, books and music.	No targets as such.	Public recycling facilities appear to be increasing.

Appendix C Scoping the need for further Sustainability Appraisal of City Plan policies

Proposed Submission City Plan Part 1 (Dec 2012)		Draft City Plan Part 1 (May 2012)		Key Changes	Conclusion
DA1	Brighton Centre & Churchill Square	DA1	Brighton Centre & Churchill Square	Key policy changes include: boundary on map amended to correct error; additional reference to townscape issues; additional references to legibility and permeability; requirement to provide training opportunities for local people; additional requirement encouraging development to consider decentralised energy infrastructure, such as heat network systems; amendment of wording relating to impact assessment. Changes to supporting text include: reference to freight trips, requirement to work in partnership with NHS and the Police; text to ensuring appropriate phasing of development; reference to One Planet approach.	The policy has been strengthened and updated, and some new requirements have been added, however the overall impact on the SA objectives would not be altered by the majority of the changes. However, the requirement for development to consider incorporating heat network systems impacts positively on the relative SA objective (18). Conclusion: update SA accordingly.
DA2	Brighton Marina, Gas Works & Black Rock	DA2	Brighton Marina, Gas Works & Black Rock	Key policy changes include: reference to providing opportunities for sustainable heat and power production; support for non-retail uses within the district centre; reference to improving access for pedestrians; new priority to encourage development to consider provision of decentralised energy infrastructure, such as heat network systems; reduction in industrial floorspace to be delivered; correction of amount of leisure floorspace to be delivered; new requirement relating to water treatment; new requirement to provide training for local	The new requirements relating to sustainable production of heat and power, and encouragement to provide heat networks are considered to impact positively against the relative objective (18) and change the short-term score to positive which is a change from the previous position. The reduction in industrial floorspace is not considered to impact negatively against the employment and

				<p>people; new requirement ensuring land contamination is compatible with proposed uses; other minor amendments.</p> <p>Changes to supporting text include: reference to the One Planet approach; additional wording on viability; additional text to support the redevelopment on the Gas Works site; reference to the proximity to the SDNP; other minor amends.</p>	<p>economic objectives, as overall the policy should still result in significant amount of employment-related opportunities. The majority of the changes strengthen the policy further and have no further impacts on the previous SA findings or scores.</p> <p>Conclusion: update SA to incorporate changes in scores and allow for other updates.</p>
DA3	Lewes Road	DA3	Lewes Road	<p>Key policy changes include: specific reference to avoiding impacts on the SDNP; added reference to increasing employment opportunities; added reference to ensuring shops are accessible; added reference relating to traffic noise; new priority encouraging developments to consider decentralised energy infrastructure, such as heat network infrastructure; reduction in number of housing to be delivered; requirement for development to connect to water and sewage infrastructure; new requirement for groundwater to be protected; commitment to work with various agencies on improving the Falmer interchange; requirement for developers to provide training place agreements.</p> <p>Changes to supporting text include: reference to One Planet approach added; reference to coordinating transport improvements with adjoining authorities and ensuring public transport access to SDNP;</p>	<p>The changes in quantum of development, although reduced, are not considered to impact negatively on the SA objectives for housing nor change the significance of the score, as the policy should still result in delivery of significant amounts of development. The new requirements relating to avoiding impacts on the SDNP and promoting transport impacts positively on the relative SA objective (4) and is a change from the previous score. In addition, the requirement to protect groundwater resources and to ensure run-off at Greenfield rates impacts positively on SA objective 7, and is also a change from the previous position.</p>

				reference to ensuring development takes account of impact on SDNP; flexibility for the Woollards Field site to provide other employment generating uses; other editorial amendments.	The majority of the other changes strengthen the policy however have no further impacts on the SA findings. Conclusion: update SA to incorporate changes in scores and allow for other updates.
DA4	New England Quarter	DA4	New England Quarter	Key policy changes include: reference to noise quality; new requirement relating to provision of decentralised energy infrastructure, such as heat network infrastructure; reference to improving quality and links between public spaces; updated or clarification over amounts of development with an increase in housing delivery; new requirement relating to provision of training opportunities; new requirement relating to water treatment. Supporting text changes include: text to recognise importance of cultural and creative industries; text relating to sewerage capacity; additional text relating to the Open Market; recognition of the importance of the National Cycle Network; text to support the need to reduce traffic noise; text supporting the requirement for district heating.	Some of the changes strengthen the policy however have no further impacts on the SA findings. The increase in the amount of housing to be delivered is not considered to change any of the previous findings. The new reference to district heating impacts positively on the score for sustainable energy across all timescales and is a change from the previous position, and is considered to be significant in the long term. Conclusion: update SA to incorporate changes in score and allow for other updates.
DA5	Eastern Road and Edward Street	DA5	Eastern Road and Edward Street	Key policy changes include: added reference to conservation areas and listed buildings in context section; added requirement in relation to incorporating decentralised energy infrastructure, such as heat network infrastructure; reduction in housing and employment floorspace to be delivered; additional ancillary uses to be	Some of the changes strengthen the policy however have no further impacts on the SA findings. The changes in quantum of development, although reduced, are not considered to impact negatively on the SA objectives for housing

				<p>delivered; added references to public art; change in approach to redevelopment of Freshfield Road Business Park. Changes to supporting text include additional wording associated with policy changes; a reference to One Planet approach and how the policy helps deliver OPL principles; the requirement for development to connect to water and sewage infrastructure; confirmation that housing will be delivered on the Gala Bingo site.</p>	<p>and employment, as the policy should still result in delivery of significant amounts of development, however this does bring some uncertainty to the score, particularly for the employment and economic development objectives. The change in amounts need to be reflected in the SA and cross checked against other SA objectives for potential impacts. The new reference to district heating impacts positively on the score for sustainable energy across all timescales and is a change from the previous position, and is considered to be significant in the long term. Conclusion: update SA to incorporate changes in score and allow for other updates.</p>
DA6	Hove Station	DA6	Hove Station	<p>Changes to policy include: context showing area is currently largely industrial; change from employment-led to employment-focussed; additional requirements relating to design; additional requirements relating to public space, community facilities and biodiversity; additional requirements relating to accessibility improvements; requirement to create employment opportunities locally; requirements relating to water distribution and treatment; requirement to protect groundwater sources; requirement relating</p>	<p>Some of the changes strengthen the policy, however have no further impacts on the previous SA findings. The new requirement to protect groundwater resources impacts positively on SA objective 7, as does the reference to addressing surface water flooding which was added following the previous SA recommendation, and changes</p>

				<p>to consideration of heat network infrastructure; additional residential development; clarification of amount of employment floorspace to be retained in Conway Street area; clarification of additional amount of employment space to be created in remaining Development Area; changes in quantum under the Conway Street Strategic Allocation; requirement to minimise loss; requirement to provide training for local people.</p> <p>Changes to supporting text include: explanatory footnotes; requirement to justify car parking for all types of development; requirement to phase development to allow for relocation of businesses; clarification that a loss of employment floorspace in some areas will be offset by mixed use elsewhere in the DA; clarification that net job gains are anticipated in the Conway Street area; additional wording relating to creative industries provision; further explanation regarding the potential for floorspace loss; text regarding support for community needs, such as school and public health and sports requirements; reference to improve access for various users over the railway; reference to findings of Energy Study.</p>	<p>the previous SA score for SA objective 7 and 19. The change in quantum of development, although reduced, are not considered to impact negatively on the SA objectives for employment and economic development, as the policy should still result in positive outcomes, however this change does bring some uncertainty to the scores against these objectives. The new reference to district heating impacts positively on the score for sustainable energy across all timescales and is a change from the previous position.</p> <p>Conclusion: update SA to incorporate changes to scores and allow for other updates.</p>
DA7	Toads Hole Valley	DA7	Toads Hole Valley	<p>Changes to policy include: amendment of references to impacts on SDNP; requirement for development to provide training and job opportunities for local people; requirement for water infrastructure</p>	<p>The new requirement in the policy to provide training and job opportunities for local people impacts positively on the relevant SA objective (15) and is</p>

				<p>to be provided; amendment of wording relating to the need to address transport impacts; amendment of wording relating to provision of decentralised energy infrastructure, such as heat networks; removal of requirement relating to reducing city's ecological footprint; commitment to work with Highways Agency on improving Devils Dyke junction; other minor editorial changes.</p> <p>Changes to supporting text include: additional wording relation to housing density; additional wording relating park & ride; text relating to Energy Study findings and the suitability of the location to provide district heating networks; new wording relating to mitigation; text relating to provision of water and wastewater infrastructure; text relating to phasing development; text which confirms maximum parking standards will be required; other minor editorial changes.</p>	<p>a change from the previous position. The removal of the reference to reducing ecological impact is not considered to have a negative impact as it is considered that some aspects of this are covered through other policy requirements. The clarification that the development will need to consider but won't be required to provide energy infrastructure results in the impact being positive against the relative objective (18) but not significantly positive.</p> <p>Amendments to the policy that took place following the previous SA also impact positively against the relative SA objectives (7) and (18) and should be reflected in the SA. Other amendments were found to either strengthen the policy or have no further impact on the previous SA findings.</p> <p>Conclusion: update SA to incorporate changes in scores and allow for other updates.</p>
DA8	Shoreham Harbour	DA8	Shoreham Harbour	<p>Changes to policy include: new requirement to accommodate future capacity requirements relating to waste water; improve access to all beaches (not just Southwick beach as in former version);</p>	<p>There are numerous changes to the supporting text, however the policy itself remains largely unchanged and the majority of the changes strengthen the</p>

				<p>deletion of wording “comprehensive development approach” relating to North Quayside/South Portslade; requirement to improve the beach environment, under Portslade and Southwick Beaches, and consideration of decentralised energy infrastructure, such as heat networks. Changes to supporting text include confirmation of key role of JAAP, further information about the Port’s importance for handling minerals and the safeguarding of minerals wharves required by the Brighton & Hove and East Sussex Waste & Minerals Local Plan; information relating to waste water treatment; and the locations potential suitability for providing a district heating network.</p>	<p>policy but have no further impact on the SA. However, the new requirement relating to waste water capacity impacts positively on the relevant SA objective (7) and is a change from the previous position. Conclusion: update SA to incorporate change and allow for other minor amendments to text.</p>
SA1	The Seafront	SA1	The Seafront	<p>Changes to policy include: new reference to public art across the whole seafront, requirement that development should respect the adjoining context in the Western Seafront, new reference to conserving the geological interest of the cliff top, specific mention of Hove Lawns, new requirements regarding avoiding adverse impacts on the South Downs National Park, encouragement for development to consider decentralised energy infrastructure, such as heat network systems; ensuring appropriate connection to the sewerage system and commitment to review and improve the national cycle route around the Western Seafront. The Strategic Allocation includes a new requirement</p>	<p>The majority of the changes strengthen the policy however have no additional impacts on the previous SA findings. The new requirement in the policy to ensure there are no adverse impacts on the setting of the South Downs National Park impacts positively on the relevant SA objective (4) and is a change from the previous position. In addition, the text which encourages development to consider heat network systems impacts positively against the relative SA objective (18) and changes the position in</p>

				regarding training places for local people. Main change to supporting text is the presumption against proposals which increase areas of hard-surfacing in the vicinity of sites of nature conservation.	the short term to be more positive. Conclusion: update SA to incorporate change and allow for other amendments.
SA2	Central Brighton	SA2	Central Brighton	Changes to policy include: importance of residential uses in centre highlighted with support for housing as part of mixed use schemes above other uses; new requirement for development to incorporate decentralised energy infrastructure, such as heat network infrastructure. Supporting text responds to concerns around binge drinking, confirms that housing would include affordable housing, includes a reference to how the policy supports the One Planet approach and commits the council to working with crime, health and other agencies.	The policy remains largely unchanged and most amendments strengthen the policy but have no further impacts on the previous SA findings. However, the support for housing impacts positively on the relevant SA objective (5), which is different to findings of the previous assessment. This needs to be reflected in SA and cross checked for impacts against other SA objectives. In addition, the requirement to provide heat network infrastructure changes the score against the relative SA objective (18). Conclusion: update SA.
SA3	Valley Gardens	SA3	Valley Gardens	Changes to policy include references to safety and legibility and new reference for development to consider provision decentralised energy infrastructure, such as heat network systems; changes to supporting text include deletion of out of date text, more detail on biodiversity, commitment to traffic-modelling and reference to vacant historic buildings in the area.	The new reference to heat network system impacts positively against SA objective and is a change from the previous position in the short term. The other changes strengthen and update the policy but have no further impacts on the SA objectives and the findings from the

					previous assessment would not be altered. Conclusion: update SA.
SA4	Urban Fringe	SA4	Urban Fringe	Changes to policy include: change in criteria from requiring one or more of policy objectives to be met to requiring policy objectives to be met. Changes to supporting text include editorial changes; removal of wording relating to accessing gateway facilities by sustainable means to reflect end of search for sites for park and ride in the urban fringe.	The amendments are considered to strengthen the policy. Although the scores of the previous SA assessment are not considered to change as a result of the amendments, this stage allows for the written assessment to be updated to reflect the key changes to ensure the SA is fully reflective of the policy position. Conclusion: update SA accordingly.
SA5	The South Downs	SA5	The South Downs	Changes to policy include: reference to duty of the National Park Authority; additional criteria reflecting the requirements of development that is located within the National Park; additional wording highlighting the council is not the planning authority for the National Park; wording to clarify Stanmer Park is within the National Park. Changes to supporting text include: reference to One Planet approach, other editorial amends.	The amendments to policy aid clarity and strengthen it against various SA objectives. However the changes have no further impact on the SA objectives and the findings from the previous assessment would not be altered. Conclusion: no further SA required.
SA6	Sustainable Neighbourhoods	SA6	Sustainable Neighbourhoods	Changes to policy include: references to improving access for disabled people, supporting engagement of equalities groups, ensuring lifetime homes standards are met, and promoting tree planting. Changes to Supporting Text include reference to delivery partners, the	The policy has been strengthened and updated. However, the changes have no further impact on the SA objectives and the findings from the previous assessment would not be altered.

				requirement for developers to show how the priorities of the policy will be met, a new aim of improving access to public art, further guidance on Neighbourhood Planning, a commitment to allocate schools sites in Part 2 of the City Plan and the encouragement of communal composting.	Conclusion: no further SA required.
SS1	Presumption in Favour of Sustainable Development	-	N/A	New policy which aims to ensure decisions are taken in line with the presumption in favour of sustainable development as set out in the NPPF.	Full SA required including SA of two options for the policy.
CP1	Housing Delivery	CP1	Housing Delivery	<p>Changes to policy include: slight change in wording to reflect need to promote efficient use of land in the city; removal of amount of housing to be allocated in Part 2 of the City Plan; new wording to emphasise the need to create mixed communities; amendments to housing delivery table to reflect updated SHLAA.</p> <p>Changes to supporting text include: removal of the numerical range of housing needed to be delivered replaced by the set amount of 15,800; clarification that the target amount of housing to be delivered is a minimum; additional reference to One Planet approach; other minor editorial changes to aid clarification and purpose of policy.</p>	<p>The policy has been updated to reflect the most recent SHLAA update and Housing Requirements Study Update. Other amendments aid clarification and subtle changes in wording, however have no further impact on the SA objectives. The previous SA assessed the level of housing delivery to be marginally higher than that put forward in the amended policy, and although the difference in amount is unlikely to have any impact on the assessment, this stage provides the opportunity to update the SA to ensure the actual amount of housing assessed reflects the policy position.</p> <p>Conclusion: update SA accordingly.</p>

CP2	Sustainable Economic Development	CP2	Sustainable Economic Development	Changes to policy include: reference to provision of start up business space. Changes to supporting text include: reference to City Prospectus; amended text referring to findings of Employment Land Review with regards to job growth; further details around start-up office space; reference to potential for jobs in renewable energy; reference to aspirations of Economic Strategy and moving towards a low carbon economy; recognition of non B-use class employers in the city; commitment to equip residents and graduates with skills; other editorial amends.	The policy has been updated to reflect the findings from the Employment Land Review Update 2012 and other emerging strategies. The majority of the changes are considered to strengthen the policy, however have no further impact on the SA objectives and the findings from the previous assessment would not be altered. Conclusion: no further SA required.
CP3	Employment Land	CP3	Employment Land	Changes to policy include: reference to B-use class amended; support for upgrades, including resource efficiency measures and design improvements of existing office accommodation in central Brighton; commitment to allocate additional employment sites in part 2 of the City Plan. Changes to supporting text include: updated table with employment floorspace quantum to be delivered over the city; various amendments reflecting findings of the Employment Land Study (2012)	The changes in quantum of development to be delivered make the impact against the employment and economic development objectives more uncertain and needs to be reflected in the SA explanatory text. The support for proposals for upgrading existing office accommodation strengthen the findings against the relative SA objectives (3, 8 and 18) and are considered to change the previous SA findings. Conclusion: amend SA accordingly.
CP4	Retail Provision	CP4	Retail Provision	Supporting text now refers to how the policy will meet the One Planet approach.	The policy remains largely unchanged and there would be no impact on the SA from the

					change to supporting text. Conclusion: no further SA required.
CP5	Culture & Tourism	CP5	Culture & Tourism	Changes to policy include: requirement for development to contribute to the sense of place and benefit the city's economy, change in references to tourism agencies. Changes to supporting text include recognition of tourism's role in local economy, references to the role the universities play in culture and tourism, recognition of importance of South Downs National Park, and clarification of the demand for creative industries workspace.	The policy has been strengthened and updated, however remains largely unchanged. The changes have no further impacts on the SA objectives and the findings from the previous assessment would not be altered. Conclusion: no further SA required.
CP6	Visitor Accommodation	CP6	Visitor Accommodation	Changes to policy include: new requirement for impact assessment; deletion of policy point referring to safeguarding accommodation within the core zone and associated text and replaced with text which allows loss of accommodation within core zone to be considered with various tests for redundancy set out. Changes to supporting text include various references to current economic climate and the impact of the recent increase of hotel bedspaces is having on existing premises; further text relating to requirement of an impact assessment; further details of demonstrating redundancy; further details on the types of alternative uses that would be acceptable, including residential; commitment to work with the hotel industry to encourage apprenticeships/local jobs in the sector.	The amendment relating to the requirement for an impact assessment is considered to strengthen the policy and although does not impact on the SA score for the relevant objectives, should be reflected in the SA explanation. In addition, the change in policy wording which now allows change of use is considered to have positive impacts against the objective for housing, which is a change from the previous position. Conclusion: update SA accordingly to reflect change and allow for other updates.

CP7	Infrastructure and Developer Contributions	CP7	Infrastructure CIL and Developer Contributions	<p>Changes to policy include: deletion and change of text relating to CIL due to delay in adoption.</p> <p>Changes to supporting text include: clarification regarding implementation of CIL, insertion of wording to clarify planning obligations in relation to affordable housing, insertion of wording to ensure infrastructure delivered in time, and reference to supporting young people who are NEET through training and apprenticeships.</p>	<p>The name of the policy has been amended to reflect the delay in adopting the CIL, however this does not impact on the previous SA findings. Other changes strengthen or further clarify the policy, however largely the direction of the policy remains unchanged and the overall impact on the SA objectives would not be altered by the amendments.</p> <p>Conclusion: no further SA required.</p>
CP8	Sustainable Buildings	CP8	Sustainable Buildings	<p>Changes to policy include: new reference requiring development to deliver the principles of the One Planet approach; amendments to the BREEAM and CSH requirements in the pre-2016/2019 period; amendment of the requirement relating to conversions; additional wording relating to orientation of development; additional wording relating to low carbon solutions; additional reference to incorporating renewable energy technology; new requirement for development to connect or contribute towards low/zero carbon energy schemes and/or incorporates provision for decentralised energy; requirement that development improves the sustainability of existing buildings; amended wording relating to sustainable materials; commitment to provide technical guidance on meeting policy requirements. Changes</p>	<p>The majority of the amendments strengthen the policy however have no impact on the SA findings or previous scores. The deferment in the requirements to meet various standards of BREEAM and CSH in the short term, changes the score for the short-term impact on the relative sustainability appraisal objectives (8, 18, and 20), however the medium and long term impact remains significantly positive.</p> <p>Conclusion: update SA accordingly.</p>

				to supporting text include: additional information relating to the findings of the Energy Study; additional reference committing to production of guidance, which will include options for off-site carbon compensation and opportunities to retrofit existing building stock; additional amendments to footnotes.	
CP9	Sustainable Transport	CP9	Sustainable Transport	Changes to policy include: commitment to provide appropriately located disabled parking provision; encouragement of use of public transport in and out of the city; commitment to provide guidance on new technologies. Changes to supporting text include: editorial changes; requirement for buses to serve key development sites; commitment to secure investment in less accessible DAs; reference to freight; reference to improving rail services; commitment to joint working with adjoining authorities; deletion of site specific text relating to infrastructure improvements; additional information regarding success of increase of bus patronage; commitment to increase use of east-west rail services and promotion of car-sharing relating to travel to stations; softening of commitment regarding budget expenditure for walking and cycling; strengthening wording around travel planning; recognition of the continuing need for disabled parking provision.	The policy has been strengthened and updated however the overall impact on the SA objectives would not be altered by any of the changes. The policy now incorporates changes resulting from the SA recommendations made during the previous assessment. In addition, a Transport Assessment for the City Plan has been updated. Therefore, although no further SA is required as a result of the changes, this stage allows the assessment to be updated to ensure the findings of the up to date assessment are considered. Conclusion: update SA accordingly.
CP10	Biodiversity	CP10	Biodiversity	Changes include: insertion of 'noise' in addition to 'light' as an indirect effect of development on biodiversity, updated and	The policy has been strengthened and updated however remains largely

				clarified information on the Biosphere bid, inserted a reference to importance of culture and community participation in achieving Biodiversity Action Plan targets.	unchanged. The overall impact on the SA objectives would not be altered by the changes. Conclusion: no further SA required.
CP11	Flood Risk	CP11	Flood Risk	Policy unchanged.	Conclusion: no further SA required.
CP12	Urban Design	CP12	Urban Design	Changes to policy include: new policy point relating to development within the setting of the SDNP. Changes to supporting text include: more detail and clarification on tall buildings areas and Tall Buildings SPG; clarification on protection and enhancement of views; references to routes around buildings and the importance of planted green space added, other minor amendments.	The majority of amendments have no impact on the SA. However the new policy point impacts positively on the relevant SA objective (4). In addition, some other minor amendments positively impact on the SA objectives. Conclusion: update SA to incorporate changes.
CP13	Public Streets and Spaces	CP13	Public Streets and Spaces	Minor amendments.	The policy has undergone minor amendments however remains largely unchanged. The overall impact on the SA objectives would not be altered by the changes. Conclusion: no further SA required.
CP14	Housing Density	CP14	Housing Density	Changes to policy and supporting text to clarify that density requirements are minimums and not targets.	The policy has undergone minor amendments to aid clarification. The overall impact on the SA objectives would not be altered by the changes. Conclusion: no further SA required.
CP15	Heritage	CP15	Heritage	Changes to policy include: text to state that promotion of heritage is an overall policy	The majority of the changes are considered to strengthen and

				<p>aim; text to recognise importance of the setting of heritage assets and the need for positive action to protect heritage assets. Supporting text amended to reflect policy changes, particularly promotion of heritage assets, plus text to explain undesignated heritage assets, how local distinctiveness is protected and how new development within Conservation areas should enhance the setting of the area and any heritage assets. Also, commitment to consult on review of Conservation Strategy and Local List.</p>	<p>update the policy, and have no further impacts on the SA objectives. However the commitment to review the Conservation Strategy and Local List will positively impact on the relevant objective (16) relating to engaging local communities which is different to findings from the previous assessment. Conclusion: amend SA accordingly.</p>
CP16	Open Space	CP16	Open Space	<p>Changes to policy include: specific reference to the beach as a form of open space. Changes to supporting text include additional clarification on accessibility standards, text confirming that new developments should seek to provide the open space required, updated requirements when applying predicted future population figures, additional text to support importance of beach as part of open space and additional text to acknowledge the community benefits that open space initiatives can have.</p>	<p>The reference to the beach strengthens the policy, however does not impact on the previous SA findings, which were already significantly positive against the relative objective. The supporting text emphasis on development to provide for open space needs required also strengthens the policy, as does the reference to community benefits, however has no further impacts on the relevant SA objectives. The remainder of policy has been amended and updated however is largely unchanged. The overall impact on the SA objectives would not be altered by any of the changes. Conclusion: no further SA</p>

					required.
CP17	Sports Provision	CP17	Sports Provision	No changes to policy text. Changes to supporting text include deletion of out of date references, recognition of Olympic legacy; updated outdoor space requirements based on updated ONS population projections; recognition of the potential of the Falmer area to become a sporting “hub” and clarification of maintenance programmes.	The policy has been amended and updated however remains largely unchanged. The overall impact on the SA objectives would not be altered by the changes. Conclusion: no further SA required.
CP18	Healthy City	CP18	Healthy City	There were no changes to the main policy text. Changes to the supporting text were as follows: reference to obesity; reference committing to developing HIA best practice guidance; new reference requiring developers to take the HEQIA findings into consideration in relation to sensitive communities; commitment to continue engagement with NHS Brighton & Hove and other health care providers over the changing needs of the city.	The commitments and requirements added to the supporting text strengthen the policy, however have no impact on the previous SA findings or scores. Conclusion: no further SA required.
CP19	Housing Mix	CP19	Housing Mix	Updated supporting text to reflect findings of updated studies. Clarification of certain policy points within supporting text.	The policy has been updated however remains largely unchanged. The overall impact on the SA objectives would not be altered. Conclusion: no further SA required.
CP20	Affordable Housing	CP20	Affordable Housing	Changes to policy include: the wording “net” for clarification; requirement for affordable housing to be integrated throughout a scheme; amended wording relating to the	The policy has been updated but remains largely unchanged. The additional wording relating to integrating affordable housing

				assessment of the appropriate level of affordable housing to be provided. Wording relating to providing commuted sums moved from policy to supporting text. Changes to supporting text include: updated data relating to affordability and housing needs, and other minor amends.	throughout a scheme strengthens the assessment against SA objective 15 however does not change the previous score and the overall impact on the SA objectives would not be altered by the changes. Conclusion: no further SA required.
CP21	Student Housing & HMOs	CP21	Student Housing & HMOs	Changes to policy include: clarification of support to existing education establishments, added a reference to mixed C3/C4 uses to ensure all types of HMO are covered by the policy, and other minor amendments and corrections of errors. Additional supporting text added to ensure purpose built student housing is only used for that purpose and commitment to work ongoing with the Universities with regards to the housing needs of students, and to work with police and other agencies with regards to the needs of students.	The policy has been updated but remains largely unchanged. The amendments to supporting text strengthens the assessment against the relative SA objectives, however the overall impact on the SA objectives would not be altered as a result of the amendments. Conclusion: no further SA required.
CP22	Traveller Accommodation	CP22	Traveller Accommodation	Changes to policy include an increase in pitch requirements from 16 to 18 to the period to 2019. New policy point requiring an early review of the policy takes place to incorporate pitch requirements. Additional supporting text relating to pitch requirements and review of policy.	The policy has been amended in order to meet pitch requirements up to 2019 (first five years of plan). This number is slightly higher than that previously assessed, however overall this change does not change the findings of the previous SA assessment. Conclusion: no further SA required.

Appendix D Sustainability Appraisal Assessments

Policy SS1 - Presumption in favour of Sustainable Development - Options Appraisal

Issue

Inclusion of a policy on the presumption in favour of sustainable development.

Background

This new policy is proposed in order to respond to guidance for other local authorities from the Planning Inspectorate which aims to ensure that Local Plans demonstrate compliance with national policy, in particular the presumption in favour of sustainable development as set out in the National Planning Policy Framework.

The presumption in favour of sustainable development places increased emphasis on the importance of meeting development needs through plans; on the need to approve proposals quickly where they are in line with those plans; and on the role of the Framework as a basis for decisions where plans are not an adequate basis for deciding applications, for example where they are out of date, absent or silent on particular issues.

Given the importance of this presumption, and the advice that such a policy should be introduced to all Local Plans, it is considered that a “do nothing” option, e.g. of not including the policy, is not a reasonable alternative and therefore this option has not been assessed. However, alternative wording to the policy as put forward by PINS has been put forward, and this has been assessed as option 2.

Option 1: Inclusion of model policy as drafted by PINS

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Option 2: Inclusion of policy as drafted below:

A positive approach to considering development proposals will be taken that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Where appropriate, the Council will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise¹¹⁵. Planning applications that accord with the policies in the development plan (including, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Proposed development that conflicts with the development plan will be refused, unless other material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then permission will be granted unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Supporting Text

The Government has placed the presumption in favour of sustainable development at the heart of its approach to planning, and this is articulated in the National Planning Policy Framework, published in March 2012. It was considered necessary to include a policy on this presumption within the City Plan Part 1.

This policy aims to ensure that decisions are taken in line with the presumption in favour of sustainable development as set out in the National Planning Policy Framework (NPPF).

¹¹⁵ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

The policies and proposals in the City Plan Part 1 reflect the presumption in favour of sustainable development set out in paragraphs 11 to 16 of the NPPF, and the inclusion of this policy avoids any doubt about whether the City Plan Part 1 complies with the presumption.

Appraisal key:

- ++ =strong positive impacts on SA objective
- + = positive impact on SA objective
- +? = positive uncertain impact on SA objective
- ? = uncertain/unknown
- /+ = mixed impacts
- ? = negative uncertain impact on SA objective
- = negative impact on SA objective
- = strong negative impacts on SA objective
- blank= no direct link or relevance between option and SA objective

SA Objective	Summary of Effects	Option 1	Option 2
1) Protect and enhance biodiversity	<p>Option 1 The inclusion of the policy has potential to bring about positive impacts through the requirement for development to secure environmental improvements, which are likely to include biodiversity, as well as through the requirement for councils to always work proactively with applicants to find solutions to enable applications to be approved. Should a proposal be solely assessed against the NPPF, then a number of policies in the NPPF (in particular Section 11 - Conserving and Enhancing the Natural Environment) would positively address this Sustainability Objective. In addition, the wording in the policy “Specific policies in that Framework indicate that development should be restricted” is considered to provide adequate protection for biodiversity.</p> <p>Option 2 Outcomes as above. The policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about positive impacts as with option 1. Should a proposal not be considered appropriate due to the potential impact of development on biodiversity, then the score for option 2 may be more positive than that of option 1, however without further details of when a proposal would not be considered appropriate this is unknown.</p> <p>It is noted that the ‘presumption in favour of sustainable development’ does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined’ (NPPF s. 119) and thus this policy will not be relevant in these situations. Nor does it apply to sites designated as SSSI (NPPF footnote 9). It may be useful to highlight this in the supporting text to the policy.</p>	+	+

SA Objective	Summary of Effects	Option 1	Option 2
2) Improve air quality	<p>Option 1 Delivery of different types of development is likely to increase emissions generated through the operation of new premises and through additional transport movements generated. The policy requirement to find solutions may assist to mitigate air quality issues but is unlikely to reduce them entirely and therefore a negative and uncertain impact is expected. Should a proposal be entirely assessed against the NPPF, there are paragraphs in the NPPF under section 4 (transport) and section 11 (conserving the natural environment) which would seek to minimise air pollution, however the impact is still considered to be negative.</p> <p>Option 2 Outcomes as above. The policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about negative and uncertain impacts as with option 1. Should a proposal not be considered appropriate due to the potential impact of development on air quality, then the score for option 2 may be more positive than that of option 1, however without further details of when a proposal would not be considered appropriate this is unknown.</p>	-?	-?
3) Maintain local distinctiveness and sites	<p>Option 1 The inclusion of the policy has potential to bring about positive impacts through the requirement for development to secure environmental improvements, which are likely to include landscapes, townscapes, parks and so on, as well as through the requirement for councils to always work proactively with applicants to find solutions to enable applications to be approved. Should a proposal be solely assessed against the NPPF, then a number of policies in the NPPF (in particular Section 7 – Requiring Good Design, Section 11 - Conserving and enhancing the Natural Environment, and Section 12 – Conserving and enhancing the Historic Environment) would positively address this Sustainability Objective. In addition, the wording in the policy “Specific policies in that Framework indicate that development should be restricted” is considered to provide adequate protection for historical and other assets.</p> <p>Option 2 As above. In addition, the policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about positive impacts as with option 1. Should a proposal not be considered appropriate due to the potential impact of development on a historical asset for example, then the score for option 2 may be more positive than that of option 1, however without further details of when a proposal would not be considered appropriate this remains unknown.</p>	+	+
4) Protect South Downs	<p>Option 1 The inclusion of the policy has potential to bring about positive impacts through the requirement for development to secure environmental improvements, as well as through the requirement for councils to always work proactively with applicants to find solutions, which may include solutions to impacts on landscape, to enable applications to be approved. Should a proposal be solely assessed against the NPPF, then a number of policies in the NPPF (in particular</p>	+	+

SA Objective	Summary of Effects	Option 1	Option 2
	<p>Section 11 - Conserving and enhancing the Natural Environment) would positively address this Sustainability Objective and specifically states that major development should be refused in designated areas such as National Parks.</p> <p>Option 2 As above. In addition, the policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about positive impacts as with option 1. Should a proposal not be considered appropriate due to the potential impact of development on the surrounding landscape, then the score for option 2 may be more positive than that of option 1, however without further details of when a proposal would not be considered appropriate this is unknown.</p>		
5) Provide decent, affordable housing	<p>Option 1 This option should result in housing being delivered. The NPPF places very strong emphasis on delivering a wide choice of high quality homes (in particular Section 6 – Delivering a wide choice of high quality homes) and the positive implementation of these policies would have a strong positive impact on this SA objective. In addition, the requirement to secure development that improves social conditions, is also likely to result in positive impacts.</p> <p>Option 2 As above, the impact of this option is likely to be positive. However the policy requirement for councils to work proactively with applicants “where appropriate” may result in fewer proposals being approved than with option 1, therefore potentially having a less positive impact. Clarification on when a proposal would not be considered appropriate would be useful and may impact upon this score.</p>	++	+
6) Reduce amount of car journeys	<p>Option 1 Delivery of different types of development is likely to increase transport movements through the operation of new premises and through additional transport movements generated by an increased population. The policy requirement to find solutions to enable proposals to be approved may assist to mitigate transport issues but is unlikely to reduce them entirely and therefore a negative and uncertain impact is expected. Should a proposal be entirely assessed against the NPPF, there are paragraphs in the NPPF under section 4 (transport) which would seek to facilitate sustainable transport, however the impact is still considered to be negative.</p> <p>Option 2 As above. In addition, the policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about negative and uncertain impacts as with option 1 as this option will still result in development, the transport impacts of which are unlikely to be fully mitigated. Should a proposal not be considered appropriate due to the potential transport impacts of development, then the score for option 2 may be less negative than that of option 1, however without further details of when a proposal would not be</p>	-?	-?

SA Objective	Summary of Effects	Option 1	Option 2
	considered appropriate this is unknown.		
7) Minimise risk of pollution to water	<p>Option 1 The requirement to secure development that improves environmental conditions of an area, which will include water quality, should have positive impacts on this objective. Should a proposal be solely assessed against the NPPF, then a number of policies in the NPPF (in particular Section 11 - Conserving and enhancing the Natural Environment) would positively address this Sustainability Objective.</p> <p>Option 2 As above. In addition, the policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about positive impacts as with option 1. Should a proposal not be considered appropriate due to the potential impact of development on water quality, then the score for option 2 may be more positive than that of option 1, however without further details of when a proposal would not be considered appropriate this is unknown.</p>	+	+
8) Minimise use of water	<p>Options 1 and 2 Delivery of different types of development is likely to increase water consumption throughout the city, however the requirement for proposals to improve environmental conditions (which is likely to include water as a resource) may help achieve positive outcomes against this objective. However, as there is little reference to the need to conserve or reduce consumption of water within the NPPF, the impact on this objective is considered to be uncertain.</p>	?	?
9) Promote development of contaminated land	<p>Options 1 and 2 The inclusion of the policy has potential to bring about positive impacts through the requirement for development to secure environmental improvements, which may include remediation of contaminated land, as well as through the requirement for councils to work proactively with applicants to find solutions to enable applications to be approved. Should a proposal be solely assessed against the NPPF, then paragraphs within Section 11 - Conserving and enhancing the Natural Environment would positively address this Sustainability Objective.</p>	+	+
10) Manage coastal defences and minimise coastal flood risk	<p>Options 1 and 2 A number of policies in the NPPF (in particular Section 10 – Meeting the challenge of climate change, flooding and coastal change) would positively address this Sustainability Objective. In addition, inclusion of the model policy should ensure that local environmental conditions are improved, which would include reducing the risk and impact of coastal flooding.</p> <p>It is noted that the ‘presumption in favour of sustainable development’ does not apply to locations at risk of flooding and that in these locations the Sequential and Exceptions Tests still apply. It may be useful to highlight this in the supporting text to the policy.</p>	+	+

SA Objective	Summary of Effects	Option 1	Option 2
11) Employment: balance needs of tourists, residents and businesses	<p>Option 1 The NPPF places very strong emphasis on securing economic growth (see in particular Section 1 – Building a strong, competitive economy, and Section 2 – Ensuring the vitality of town centres) and the positive implementation of these policies would have a major beneficial impact on this SA objective. In addition, the requirement to secure development that improves economic conditions, is also likely to result in positive impacts.</p> <p>Option 2 As above, the impact of this option is likely to be positive. However the policy requirement for councils to work proactively with applicants “where appropriate” may result in fewer proposals being approved than with option 1, which may impact on employment opportunities, therefore having a less positive impact. Clarification on when a proposal would not be considered appropriate would be useful and may impact on this score.</p>	++	+
12) Support economic development	As with objective 11.	++	+
13) Improve health	<p>Options 1 A number of policies in the NPPF (in particular Section 8 – promoting healthy communities) would positively address this Sustainability Objective. In addition, inclusion of the model policy should ensure that local social conditions are improved, which would include improving health and reducing inequalities.</p> <p>Option 2 As above. In addition, the policy requirement for councils to work proactively with applicants “where appropriate” is still considered to bring about positive impacts as with option 1. Should a proposal not be considered appropriate due to the potential impact of development on health, then the score for option 2 may be more positive than that of option 1, however without further details of when a proposal would not be considered appropriate this is unknown.</p>	+	+
14) Integrate health and community safety	<p>Options 1 and 2 A number of policies in the NPPF (in particular Section 7 – Requiring Good Design and Section 8 – Promoting Healthy Communities) would positively address this Sustainability Objective. In addition, inclusion of the model policy should ensure that local social conditions are improved, which would include improving community safety.</p>	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Options 1 and 2 A number of policies in the NPPF address contributors to poverty and social exclusion and would positively address this Sustainability Objective. In addition, inclusion of the model policy should ensure that local social conditions are improved, which would include addressing factors of deprivation.</p>	+	+
16) Engage local communities	No impact on this objective.		

SA Objective	Summary of Effects	Option 1	Option 2
17) Make the best of previously developed land	Options 1 and 2 A number of policies in the NPPF - Core Planning Principles in the NPPF (para 17 point 8) and also paragraph 111 in the section Conserving & Enhancing the Natural Environment would positively address this objective through the requirement that the effective use of land should be encouraged, by re-using land that has been previously developed, provided it is not of high environmental value.	+	+
18) Maximise sustainable energy	Options 1 and 2 Delivery of different types of development is likely to increase energy consumption throughout the city, however the requirement for proposals to improve environmental conditions (which is likely to include reducing energy consumption) may help achieve positive outcomes against this objective. This is further backed up by the NPPF, particular the Section 10 Meeting the challenge of climate change, flooding and coastal change, paragraph 95 which requires development to reduce greenhouse gas emissions, supports energy efficiency in new developments and for national described standards to be achieved. In addition paragraph 97 promotes the use and supply of renewable and low carbon energy.	+	+
19) Taking account of the changing climate	Options 1 and 2 Development coming forward would be required to improve environmental conditions, which may include vulnerability to impacts of climate change, therefore achieving positive outcomes for this objective. In addition, a number of policies in the NPPF, such as Section 10 Meeting the challenge of climate change, flooding and coastal change, would positively address this objective through the requirement that new development should be planned to avoid increased vulnerability to the impacts of climate change and that sequential planning should be used to avoid the risk of flooding.	+	+
20) Meet BREEAM / Code for Sustainable Homes	Options 1 and 2 Likely to result in positive outcomes against this objective. Paragraph 95 of the NPPF requires local standards to be consistent with government's zero carbon buildings policy and to adopt nationally described standards.	+	+
21) Improving accessibility	Options 1 and 2 Development of varying types would be approved with both options, thereby physically increasing health, education, jobs and retail provision. The NPPF places very strong emphasis on securing economic growth (see in particular Section 1 – Building a strong, competitive economy and Section 2 – Ensuring the vitality of town centres), on supporting development of healthy communities (see section 8 - Promoting Healthy Communities) and on supporting provision of sustainable transport infrastructure (see section 4 – Promoting Sustainable Transport. Implementation of these policies would have a positive impact on this SA objective.	+	+
22) Reduction of waste	Options 1 and 2 Waste will be generated in the construction of all types of development, and will be produced at operational stage. The policy requirement to find solutions to enable proposals to be approve may assist to mitigate issues around waste, potentially at construction stage, but is unlikely to reduce waste entirely and therefore a negative impact is expected with both options. More development may come forward with option 1 than with option 2, however this is not considered to bring about any significant difference in the score between options. The NPPF does not contain specific waste policies, since national waste planning policy will be published as part of the National Waste Management Plan for England.	-	-

Conclusion and Recommendations

The main difference between the two options that has an impact on the sustainability appraisal is the wording in option 1 “it will always” which is substituted in option 2 to “where appropriate”. The SA considers that this wording in option 2 isn’t as strong as the wording in option 1, is potentially more subjective and may be open to interpretation unless clear circumstances where development is or is not appropriate is included as supporting text.

The SA found that the wording “it will always” in option 1 may result in more proposals being approved than with option 2. This has therefore led to a more positive score on some of the developmental sustainability objectives for option 1, including provision of housing, employment and economic development.

There is not considered to be any significant difference between the scores for options against other sustainability appraisal objectives, as the wording in both policy options that requires improvements to local environmental, social or economic conditions would provide mitigation regardless of the amount of development delivered. This wording, in addition to the policies outlined in the NPPF, in cases where only these would be applied, was found to achieve positive outcomes against almost all sustainability appraisal objectives. The impact on the objectives relating to reducing car journeys and improving air quality was found to be negative, with it considered unlikely that an increase in development would cause a reduction in car journeys made, nor that total mitigation could be achieved.

There is some degree of uncertainty across most of the objectives, because the circumstances under which a proposal would not be considered appropriate are unknown. For instance, if impacts on biodiversity are grounds for when a proposal is considered not to be appropriate, then the score for option 2 may be more positive than the score for option 1 against the biodiversity sustainability appraisal objective.

The SA suggests that if option 2 is put forward there needs to be further explanation and clarification in the supporting text, as to what is not considered to be appropriate.

SA recommendations

Option 1 has potential for stronger positive impact against the developmental objectives, due to the wording “it will always”. However, the difference between the remaining objectives remains insignificant.

Should Option 2 be put forward as the preferred policy, the SA recommends that the supporting text should clarify circumstances when development would not be considered appropriate.

In addition to the recommendation outlined in the above paragraph, the following recommendations are applicable for either options.

1. There is no indication as to what criteria will be used to determine whether the policies in Plan are considered to be “out of date” and as such, would trigger implementation of the latter part of the policy. It may be helpful to define this in the supporting text.
2. It is noted that the presumption in favour of sustainable development does not apply to locations at risk of flooding and that at these locations the Sequential and Exceptions Tests still apply. It may be useful to highlight this in the supporting text.
3. It is noted that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined (NPPF s.119) and thus this policy will not be relevant in these situations. Nor does it apply to sites designated as AONB or SSSI (NPPF footnote 9). It may be useful to highlight this in the supporting text.

Policy DA1: Brighton Centre and Churchill Square

The Brighton Centre and Churchill Square area is also a Strategic Allocation

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impact. In general, the development area is currently lacking in biodiversity therefore the issue that development could have a negative impact on existing biodiversity is not considered to be significant. Further development provides opportunities to incorporate features to enhance biodiversity, as well as provide links to join areas of biodiversity together and create links to the green network. The specific references within the policy to ensuring development incorporates biodiversity features should ensure that the impact against this objective is positive. In addition, CP10 sets out the requirements in terms of provision of biodiversity features in new development.	+	+	+
2) Improve air quality	Direct impact. The Development Area is situated within the AQMA, with monitoring sites within the Development Area exceeding the Government's Air Quality Objective for Nitrogen Dioxide (e.g. W10). Improving air quality at one of the key junctions in the Development Area is one of the local priorities included in the policy. In addition, the policy also contains other local priorities which aim to minimise car journeys through ensuring public and sustainable transport serve new development. These priorities may help to reduce journeys made by car to the area which would have a positive impact on air quality. However, car journeys to this central Brighton area are already high, with the area likely to be one of the main destinations for visitors arriving by car, regardless of whether they are accessing Churchill Square or the conference facilities. An improved conference centre may cause an increase in number of journeys made by car and it is likely that an increase in retail floorspace will cause an increase in journeys to the vicinity, as 20,000sqm is approximately equivalent to an additional floor. Congestion is already a problem along this central area of the seafront, exacerbated by cars queuing for Churchill Square area car-parks, which is a contributing factor to poor local air quality. Movements by freight are also high in the city centre, and the SA notes the reference in the supporting text regarding re-routing freight, which should bring about some positive impacts, however overall the impact is still considered to be negative. The cross-cutting policy for sustainable transport (CP9) should help to mitigate against the anticipated negative impacts of this policy.		-	-
3) Maintain local distinctiveness	Direct impact. The existing Brighton Centre is of poor architectural design. The policy specifies that proposals must be of high quality and innovative design, therefore is likely to lead to an improvement in local distinctiveness. In addition, the policy now makes a specific reference to improving townscape and other heritage assets. The Brighton Centre is situated next to The Grand hotel, which is a listed building and the seafront area is adjacent to the Regency Square Conservation Area, and therefore due care must be taken not to detract from these. The requirements of CP12/13 should address this concern. In addition, any improvements to townscape and public realm will also help to improve local distinctiveness,	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	particularly around the Western Road area.			
4) Protect South Downs	No impact on this objective.			
5) Provide decent, affordable housing	It is unlikely that the policy will result in the development of any housing, therefore there is no impact on this objective. Housing needs for the city will be met through other locations.			
6) Reduce amount of car journeys	<p>Also see objective 2.</p> <p>Direct impact. The SA considers the policy to contain some positive measures which promote sustainable and public transport, however any increase in retail offer and improved conference facilities may result in an increase in the number of car journeys in the local area. In addition, movements by freight are also high in the city centre, and the SA notes the reference in the supporting text regarding re-routing freight, which should bring about some positive impacts, however overall the impact is still considered to be negative.</p> <p>The policy priority A5 should ensure that new development is served by public and sustainable transport. In addition, this requirement is also repeated under the strategic allocation.</p> <p>It is unknown whether any additional parking will be made available, either for Churchill Square or the Brighton Centre developments, however any increase in car park capacity would be likely to lead to an increase in car journeys made to the area and at implementation stage.</p> <p>Some of the measures outlined in CP9 may mitigate against this.</p>		-	-
7) Minimise risk of pollution to water	Indirect impact. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city, which must be protected under the requirements of the Water Framework Directive. The development area consists of entirely urbanised areas therefore new development is unlikely to cause an increase in non-permeable surfaces. According to the SFRA 2012 the area is considered to be at low risk of surface water flooding. New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.	+	+	+
8) Minimise use of water	Indirect impact. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. CP8 and SPD08 should ensure that water consumption is minimised.	-	-	-
9) Promote development of contaminated land	Direct impact. The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have caused localised contamination. Further investigation would need to be carried out at planning application stage.	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
10) Manage coastal defences	The central seafront area is currently protected by the large shingle beach controlled by a field of concrete and timber groynes. Over time the beaches may become narrower and the defences exposed, however development in this location is unlikely to lead to a negative impact on coastal defences. Protection of the coastline addressed under SA1.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. The impact is likely to be significantly positive on this objective in the medium to long term, with key aims of the policy to sustain the tourism, leisure and retail-based economy for the next 30 years. The policy should lead to a minimum of 20,000sqm of additional retail floorspace being delivered which should significantly increase retail-based employment opportunities in the area. In addition, new conference facilities should lead to an increase in business/conference trips to the city, and lead to increased opportunities for employment in this sector. Increased conference trips in particular is likely to lead to an increase in need for midweek hotel space and service sector employment. The SA notes that the policy no longer contains a reference to build a hotel as part of the scheme in order to allow for flexibility, and this is not considered to have any impact on the effect or score. The SA welcomes the new requirement for training to be secured for local people, which should also impact positively on this objective.	+	++	++
12) Support economic development	Direct impact. As with objective 11. The policy is likely to lead to an increase in economic activity, particularly in the retail, business and conference sectors, as well as promoting tourism and enhancing facilities for visitors. In addition, any development will lead to an increase in need for workers during construction stage, having wider economic benefits. As above, the removal of the reference to a hotel is not considered to have any impact on the objective, with the overall impact remaining positive. In addition, the new reference in the supporting text with regards to timing the development with other major development in the city, should help to ensure that there is no shortfall in music or conference facilities during the re-development, and this will have positive impacts on this objective. Development proposals will need to submit an impact assessment, as required by CP4.	+	++	++
13) Improve health	Direct impact. There are various factors whereby this policy could have a positive impact on health. The provision of employment opportunities is a wider determinant of health. Improvements to townscape/public realm and overall appearance of the area will contribute towards improved mental well-being. Improved cycling and walking networks which may encourage a reduction in car-use and congestion, and may encourage physical activity would have a range of positive impacts on health. As the policy is concerned with development, there may be adverse health impacts associated with new development, both at construction and operation state, however these should be addressed under the requirement to carry out HIA through CP18. However, should an increase in car-based traffic and congestion occur, there is the potential to have a negative impact on health, mainly linked to road safety and air quality, but also road-related noise, in the long term.	+	+	-/+
14) Integrate health and	The Development Area is located within the Regency ward which contains the most deprived	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
community safety	LSOA (in the crime domain) in Brighton & Hove, as well as several LSOAs falling within the 20% most deprived (crime domain) in the UK (IMD 2010). The policy makes reference to the community/public safety issues associated with the West Street area located within the Development Area and seeks to ensure that any replacement leisure facilities help to ensure a more balanced range of evening economy uses in order to address these issues. In addition, the policy also specifies that contributions towards improving community and public safety in this area will be required. This should help to improve community/public safety in this area.			
15) Narrow the gap between deprived areas and rest of the city	Direct impact. Areas within the Regency ward fall within the 20% most deprived in the overall domain in the IMD 2010, with the crime and living environment domains being of particular concern. The policy seeks to address some of these concerns, particular the issue of crime and community safety. The policy should also help to secure training for local people, which would contribute towards reducing skills and employment deprivation.	+	+	+
16) Engage local communities	Indirect impact. There will be a variety of opportunities for community engagement through delivery of this policy.	+	+	+
17) Make the best of previously developed land	Direct impact. The area is all previously developed land	+	+	+
18) Sustainable energy	Direct impact. Any new development or redevelopment will lead to an increase in energy use, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the SA recognises that the policy now encourages developments to consider heat network systems, for current or future developments, and this is considered to bring about positive impacts. In addition, government targets for all non-residential development to be zero carbon by 2019 should also ensure the impact is positive in the medium to long term.	+	+	+
19) Taking account of the changing climate	No direct impact. Although situated along the coastal frontage, the area is not in a tidal flood risk area, (with climate change). In addition, the area is at low risk of surface water flooding. Therefore, development in this location is not anticipated to impact on the city's or the developments ability to adapt to climate change. Therefore, there is no direct impact. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, however CP8 requires all development to be able to respond to changing needs.			
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no longer any specific reference for development within the area to meet specific standards, including the strategic allocation. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
21) Increasing accessibility	Direct impact. The improvements to pedestrian and cyclist access through the area, as well as improvements to public transport and the requirement to improve permeability and legibility should increase accessibility both to the new developments as well as to wider central Brighton area.	+	+	+
22) Reduction of waste	Indirect impact. Redevelopment of the Brighton Centre as well as an extension to Churchill Square is likely to lead to an increase in waste at construction stage, although this would be minimised through implementation of the Construction & Demolition Waste SPD and through the requirement for a SWMP. However, it is likely that increased capacity would also cause an increase in waste at operational stage.	-	-	-

Policy DA2: Brighton Marina & Black Rock

The policy contains three strategic allocations: Brighton Marina Inner Harbour, Gas Works and Black Rock. The Inner Harbour and Gas Works sites were put forward for inclusion as strategic allocations in the Sustainable Economic Development Option Paper, October 2011. The option to specifically allocate employment sites within Development Area policies was assessed as option 4(ii) in the Options Paper against the alternative option 4(i) of not allocating employment sites. The Sustainability Appraisal found option 4(ii) to be the preferred option.

For assessment purposes, it is presumed that the quantum of development outlined in the policy are viable and will be delivered.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The Marina itself has a severe lack of green open space and biodiversity therefore development could increase the amount of biodiversity in the Marina itself, e.g. through features that enhance or encourage biodiversity. However the site is adjacent to an SSSI and three SNCIs, some of which contain habitats of International Conservation Importance (coastal vegetated shingle). There is also much maritime biodiversity that has colonised the marina environment which is now dependant on the unique micro-habitat. In addition, the National Park boundary comes to the cliffs to the east of the Marina and development has potential to have a direct or indirect negative impact on any of these designated sites. However, the SA notes that the policy makes specific references to protecting the ecological environment, enhancing the biodiversity, geodiversity and having regard to the designated sites located within or adjacent to the Marina, as well as implementing an ecological masterplan, and these requirements should ensure the protection of these key sites, as well as biodiversity in general. In addition, the policy makes a specific requirement to create links between green spaces. Therefore a -/+ score is awarded to reflect the potential risks of development in this area but the positive aspirations of the policy. In addition to the requirements of the policy, CP10 should also ensure that negative impacts are avoided.</p>	-/+	-/+	-/+
2) Improve air quality	<p>DA2 is currently situated outside the declared AQMA. The DA is currently served by public transport, however access for pedestrians and cyclists is poor. There are a number of measures contained within the policy that should help to improve access and connectivity to the wider area and thereby have a positive impact on local air quality including: improvements to public realm, enhancement of transport infrastructure, enhanced bus service and improved pedestrian/cyclist access. However, the policy includes a variety of different types of developments, with a significant number of housing units, all of which are likely to put increased pressure on transport available and may result in an increase in people travelling by car, either for visiting the Marina for leisure/work purposes or as residents, or an increase in journeys made by other</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	forms of transport, e.g. for delivering goods and so on. The amount of housing to be delivered could significantly increase local car ownership, which may worsen air quality in and around the area, unless a significant amount of car free housing is delivered, and is likely to result in sensitive receptors being located by the roadside.			
3) Maintain local distinctiveness and sites	<p>The Marina area itself does not have a coherent urban form and the areas of public realm have resulted from piecemeal, haphazard development over time. There are few buildings to note within the area, however the Kemp Town Conservation Area lies to the north west of the Marina and therefore any development must have due regard and not detract from this status. The policy is likely to lead to improvements to local distinctiveness within the Marina area itself, through creation of a sustainable mixed use district of the city containing high quality building design, whilst preserving and emphasising the traditional Marina uses.</p> <p>The policy does not allow development above cliff height, and this should ensure that the adjacent Conservation Area and SDNP are protected in relation to adverse impacts on views or their setting and this is reflected in the positive aspect of the mixed score.</p> <p>The policy specifies that open space must be provided in accordance with other city plan policies. It is presumed that this will be balanced with competing uses, however the SA considers it unlikely that the full open space needs of the future population will be able to be met on site. Open space is currently lacking on site, however the SA recognises that the site is adjacent to and within walking distance from most typologies of open space although is on the outer boundary of provision for children and young people, and is not within reasonable distance to provision of allotments, however actual access to these sites from within the Marina area is poor. The presumed inability to provide additional open space on site, is reflected in the negative aspect of the score.</p>	-/+	-/+	-/+
4) Protect South Downs	The Marina area is situated adjacent to the SDNP boundary. The policy specifies that development should not breach cliff height, which should ensure that any adverse impacts on terms of the view of or from the SDNP, as well as on the setting do not occur. The policy is therefore considered to have positive impacts on this objective.	+	+	+
5) Provide decent, affordable housing	The policy should provide 1940 residential units, some of which will be affordable in accordance with CP20 and will therefore have a significantly positive impact on this objective.	+	++	++
6) Reduce amount of car journeys	<p>The Marina is currently served by public transport, however access for pedestrians and cyclists is poor. In addition, there is currently a large free car park that encourages people to drive to the Marina for leisure or other purposes. The policy includes a variety of different types of developments, with a significant number of housing units, all of which are likely to put increased pressure on transport available and may result in an increase in people travelling by car, either for visiting the Marina for leisure/work purposes or as residents, potentially adding to existing congestion. In addition, access is limited to the Marina via the vehicular ramps which dominate the Marina environment.</p> <p>There are a number of measures contained within the policy that should help to improve</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>access and connectivity to the wider area and thereby have a positive impact on reducing the number of journeys made by car including: improvements to public realm, enhanced bus service, enhanced transport infrastructure and improved pedestrian/cyclist access. In addition, the policy now also states that proposals should maximise opportunities to reduce car ownership. However, despite the positive aspirations of the policy, the SA considers that congestion and car ownership and travel to accommodate the needs of other uses located within or around the marina will increase as a result of the policy.</p> <p>The cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures.</p>			
7) Minimise risk of pollution to water	<p>The SFRA 2012 identified the entire site to be at risk of surface water flooding in the 1 in 200 year event and the area currently dominated by the existing supermarket car park to be at risk in the 1 in 30 year event. Therefore development in this location would need to be planned in order to reduce the consequence of flood risk and to ensure that flood risk is not increased elsewhere.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>	-	-	-
8) Minimise use of water	<p>Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>The requirements of CP8 should ensure that water consumption is minimised.</p>	-	-	-
9) Promote development of contaminated land	<p>The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage. In addition, the Gas Works site has potential for significant contamination, and part of the site has already been remediated and the policy now contains a new requirement to show that potential new uses would be compatible with possible land contamination.</p>	+	+	+
10) Manage coastal defences	<p>The SFRA 2008 and 2012 indicates that Brighton Marina is situated within floodzone 3a (high probability of flooding) and therefore the impact on this objective is considered to be negative. The SFRA also found the area to be at increased risk of flooding due to climate change, due to reduction in the standard of protection provided by the inner harbour walls over time.</p> <p>All development proposals would need to carry out a site specific flood risk assessment and any development proposals for more vulnerable uses would need to pass the sequential and exception tests. The SA notes that the policy requires developments to be in accordance</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>with the Shoreline Management Plan and incorporate site specific flood risk assessments in line with recommendations set out in the SFRA.</p> <p>There is the risk that any construction works could destabilise the cliffs, however the policy requires development proposals to accord with the relevant Shoreline Management Plan which should avoid any negative impact on the sea defences and cliff stability.</p>			
11) Employment: balance needs of tourists, residents and businesses	<p>The policy is likely to have a significant positive impact on this objective in the medium to long term, through provision of a range of development uses. The policy should lead to 5,000sqm retail floorspace situated in the Inner Harbour area, 2,000sqm of industrial employment floorspace (B1 and B2) at the Gas Works area, and 10,500sqm of leisure floorspace at the Black Rock area and the Gas Works area, as well as other uses. The SA notes that the amount of industrial to be delivered has reduced based on findings of the Employment Land Study and that the amount set out in the policy is considered to be achievable given the site constraints.</p> <p>The delivery of this amount of varying uses will meet the needs of residents and tourists alike and provide opportunities for employment on site, both during construction and operation stage. There is also a requirement that some of the B1 and B2 floorspace includes a range of sizes of units, including small and start-up units, which will help to meet the needs of a variety of industries. The leisure facilities at the Black Rock site will further benefit existing shops, restaurants and others located within the Marina, with potential for increased footfall. Employment created in this location could be of particular benefit locally, and the SA welcomes the new requirement for all strategic allocations to provide training for local people, which could help reduce employment based deprivation. The SA notes that the reduction in industrial floorspace will need to be met elsewhere in the city, to ensure the city's overall needs for this type of floorspace is not compromised.</p>	+	++	++
12) Support economic development	<p>As with objective 11, the policy should be positive for a number of sectors, particularly, retail and independent retailers through helping to improve the performance of the district centre, benefiting existing shops and services, as well as providing need for additional uses as outlined above. In addition it will provide leisure and recreation facilities that attracts visitors and residents to the area, having wider economic benefits for the area. The policy also seeks to protect the existing marina related uses, benefiting the leisure and hospitality sectors and also aims to provide for varying employment needs through delivery of office and industrial, including start up units. All of these anticipated outcomes will have positive impacts and support economic development. Again, as stated under objective 11, the reduction in the amount of industrial employment floorspace delivered will need to be met elsewhere in the city, to ensure economic growth in this sector is not compromised.</p>	+	++	++
13) Improve health	<p>Overall, there should be positive implications for health resulting from delivery of this policy. This is due to the provision of housing and employment, both of which are wider determinants of health as well as the range of services that would usually be located in a district centre. In addition, the provision of a new health facility either within or in the vicinity</p>	+	+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	of the Marina will also have benefits in terms of access to health facilities, and a new community facility will have benefits in terms of access to social activities and community cohesion. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being. In accordance with CP18, a Health Impact Assessment of the strategic development would need to take place in order to ascertain impact on existing communities. However it is acknowledged that any increase in traffic could have negative impacts on health in the long term, due to reduced air quality, increased noise and road safety.			
14) Integrate health and community safety	Although improving community safety is not a key priority, the policy is likely to result in measures that prevent anti-social behaviour, through design of buildings that offer natural passive surveillance and a mixed-use community. Improvements to access for pedestrians and cyclists, as well as improvements to permeability should also lead to improvements in road safety.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The Marina is situated within the Rottingdean Coastal ward, although is situated in closer proximity to the adjacent East Brighton ward, which lies to the north of the Marina. The East Brighton ward has significant levels of deprivation, with some LSOAs situated within the ward having the highest levels of deprivation in the city in some domains, including income and education & skills. The policy is likely to have a positive impact on narrowing the gap and reducing inequalities through a variety of infrastructure that will be delivered or improved through implementation of the policy, e.g. community building, GPs practice, and additional school places. All of these will be needed to meet the needs of the predicted increase in population resulting from increased housing in the area as well as meeting existing needs. In addition, employment created in this location could be of particular benefit locally, with several local super output areas located in East Brighton area suffering from high levels of employment and income deprivation, and the new requirement for developers to provide training for local people should further enhance opportunities.	+	+	+
16) Engage local communities	The policy will allow for engagement of the local community through consultation on strategic developments coming forward.	+	+	+
17) Make the best of previously developed land	The Development Area is all previously developed land therefore the policy should have a positive impact on this objective. The policy makes a specific reference to optimising development on PDL through delivery of high density mixed development.	+	+	+
18) Maximise sustainable energy	Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the policy has a specific reference to maximising opportunities for large-scale zero and low-carbon energy technologies to serve the Marina and wider city reflecting the mixed score in the short term. In addition, the policy also encourages developers to consider heat network infrastructure, which would also have positive implications for this objective. In	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>addition, the government targets for all new homes to be zero carbon by 2016 and all new non residential development to be zero carbon by 2019, should also ensure the impact is positive,</p> <p>In addition, CP8 requires all new residential development (major development) to achieve zero carbon status, as well as requiring various standards in either CSH or BREEAM depending on the type of development.</p>			
19) Taking account of the changing climate	<p>The potential impacts of climate change include an increase in extreme weather events, e.g. droughts, storms and heavy rainfall, as well as predicted rises in sea level which will increase the likelihood of tidal flooding. The SFRA 2012 outlines areas which will be at risk of tidal flooding as a result of the effects of climate change and this includes areas situated on the developed area of the Marina. Development in this area is therefore considered to be at greater risk of the impacts of climate change, particularly coastal flooding with climate change reducing the effectiveness of the existing sea defences over time.</p> <p>New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, likely to be more prevalent in the exposed location of the Marina. CP8 requires all development to be able to respond to changing needs and CP11 ensures coastal defences are protected.</p>	-	-	--
20) Meet BREEAM / Code for Sustainable Homes	<p>Although the proposals will be expected to meet the building standards set out in CP8, there is no specific requirement within the policy, and therefore the impact on this objective is considered to be negative.</p> <p>CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.</p>	-	-	-
21) Increasing accessibility	<p>The policy should have a positive impact on this objective. Improvements to access to the area should occur, including pedestrian and cycle access, as well as improvements to public transport. In addition, the policy will also result in a variety of developments and infrastructure, including healthcare provision, a community building, housing and employment opportunities, thereby increasing provision for local people to access local services.</p>	+	++	++
22) Reduction of waste	<p>Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.</p>	-	-	-

Policy DA3: Lewes Road

The policy contains three strategic allocations: Preston Barracks and Brighton University, Woollards Field and Falmer Released Land, Former Falmer High School.

The Woollards Field site was put forward for inclusion as a strategic allocation in the Sustainable Economic Development Option Paper, October 2011, as Issue 4, option 2, although has been referred to as a site in various iterations of the document.

The Falmer Released Land reflects a recent planning application and forms part of the American Express Community Stadium's previously approved scheme.

The specific allocation of primary employment sites in Development Area policies was assessed against the alternative option of not allocating primary employment sites at Policy Options Papers stage (October 2011), and was found to be the preferred option.

For assessment purposes, it is presumed that the quantum of development outlined in the policy are viable and will be delivered.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. The policy includes the strategic allocation of a Greenfield site, Woollards Field South, which is situated to the north of the Development Area. Although separated by the A270, the site is adjacent to Stanmer Park, which is within the boundary of the SDNP, is a Historic Park & Garden, and is a proposed Local Nature Reserve (see also objective 3). The loss of any Greenfield site has potential to have adverse impacts on biodiversity, depending on the species and habitats present. It is understood that an Ecological Study was submitted as part of the planning application for The Keep, situated on the remainder of the site Woollards Field, made various recommendations in relation to retaining, or replacing and improving the existing habitats with a score of +91 nature points when assessing the proposals against the requirements of the SPD11 (Nature Conservation). Additional requirements were also made as part of the decision and includes planting and features to be implemented around the wider site.</p> <p>To the south of The Keep, the area is predominantly amenity greenspace, and is likely to be of low ecological value, however would need to be assessed as part of any planning application making the impact uncertain.</p> <p>The policy also includes the allocation of Falmer Released Land, which is a brownfield site and currently contains buildings that formed part of the former Falmer High School. This site lies adjacent to the Bevendean Down Local Nature Reserve and the Westlain Plantation SNCI. This SNCI is ancient semi-natural broad-leaved woodland, which is considered rare locally. It is understood that discussions with the council's ecologist have been taken place prior to the planning application for development of the car-park/Bridge Community Education Centre being submitted and that mitigation measures have been included to ensure the protection of this woodland area, including a 15m buffer zone around the site. The planning application also proposes management within the buffer zone to increase the</p>	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>ecological value of the buffer zone.</p> <p>The policy also includes the strategic allocation of the Preston Barracks site. The Brighton University (Watts Bank) SNCI is situated within the site boundary, and is adjacent to the Crespin Way SNCI. The Watts Bank SNCI is also an adopted Greenway.</p> <p>The SA recognises that the policy contains various references which should lead to an increase or improvement to existing biodiversity along the Lewes Road, with improvements to public realm and townscape, including greening of the route, one of the local priorities, as well as delivering biodiversity improvements contributing to Biosphere Objectives. The strategic allocations also all require development to contribute towards BAP objectives. These requirements contained within the policy should have a positive impact on biodiversity, however overall it is also considered to be uncertain as will depend on what improvements are implemented, as well as the results of site surveys.</p> <p>In addition, CP8 requires all non-residential development on Greenfield sites to meet BREEAM excellent, which includes requirements for ecology. New development elsewhere throughout the Development Area also provides the potential to enhance biodiversity through incorporation of biodiversity features in accordance with CP8 and CP10.</p>			
2) Improve air quality	<p>Direct impact. The DA was chosen due to its location on a sustainable transport corridor, therefore having good existing access to public transport (both bus and train). One of the overarching aims of the policy is to facilitate, promote and invest in sustainable transport infrastructure, which includes bus, walking and cycling as well as improve air quality along Lewes Road, including ensuring development does not increase the number of people exposed to poor air quality, for instance, by ensuring that sensitive receptors are not located by the roadside. The policy therefore contains various proposals which are considered to be beneficial for air quality. In addition, strategic allocations are also required to provide sustainable transport infrastructure to support the schemes.</p> <p>However, as the policy is concerned with significant development, including residential and employment development there is the risk that car ownership within the area or journeys by various other forms of transport, including freight, to/from and through the area could increase, which would have an associated impact on air quality.</p> <p>A significant proportion of the Lewes Road is currently located within the AQMA 2008 due to the exceedance in levels of NO₂ with 2011 monitoring within the Air Quality Progress Report 2012 showing the annual NO₂ levels to have exceeded the air quality objective at various locations on Lewes Road and this will need to be carefully monitored. The SA suggests that the area would be suitable for low-car or car-free housing due to its location. Monitoring at the diffusion tube sites will help to measure the impact on air quality.</p> <p>In addition to the priority of air quality in the policy, CP9 should help to minimise the impact on air quality.</p>	-	-	-
3) Maintain local distinctiveness	<p>The Lewes Road area contains a mixture of land uses, including housing, areas of open space, educational establishments and retail. The area as a whole has a mixed and</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>generally poor quality townscape and public realm and is separated in parts by a busy dual carriageway that carries a large volume of traffic. The townscape and public realm is likely to improve, with this being an overarching aim of the policy and the comprehensive design guidance produced for the area will ensure continuity in design. In addition, there are various references to protecting locally or nationally designated sites, such as the SDNP, SNCIs and will also include other designations.</p> <p>The policy also seeks to secure improvements in open space, with reference to Saunder's Park, William Clarke Park as well as under-used spaces in Moulsecoomb and Bevendean. The northern wards of the Development Area are within good proximity to most typologies of open space, and can meet the needs of future population levels across most typologies, however the southern wards of the Development Area don't meet the needs of existing population levels. Woollards Field is classified as amenity green space in the Open Space Study update, with the study indicating that the needs of the existing and future population, in terms of access to amenity greenspace are being met, therefore the loss of this site to development is unlikely to have any adverse impact in relation to access to this type of open space. It is understood that The Keep development on this site has secured improvements to the children's play area located at the edge of the site, as well as other open space improvements on the site.</p> <p>The Development Area is bounded by Stanmer Park to the north, which is within the SDNP, is a Historic Park and Garden and a proposed Local Nature Reserve and a Conservation Area. The Valley Gardens Conservation Area which includes the Level, is situated at the southern edge of the Development Area. There are 3 SNCIs located within the Development Area, two of which are in close proximity to the Preston Barracks site, the other situated to the north of the Falmer campus, on the edge of the Development Area. In addition, the Westlain Plantation SNCI adjoins the Falmer Released Land site.</p> <p>Overall, the impact of this policy on this objective is considered to be mixed. Although the impact is likely to be positive through improvements to townscape and protection of distinctive sites, the provision of this amount of housing in this location could have implications on open space, and meeting the open space needs of the future population, particularly in the southern part of the Development Area.</p>			
4) Protect South Downs	<p>The Lewes Road provides an important link from Brighton to the Downs. Improvements to sustainable transport along the Lewes Road is likely to lead to improved sustainable access to the Downs and now the supporting text includes a reference to improving sustainable transport access to the SDNP. Although there is a risk that development in some locations within the Development Area may impact on the setting of the National Park, the policy now contains two separate references which should ensure there are no adverse impacts on the setting of the SDNP from development. The impact is therefore considered to be positive.</p>	+	+	+
5) Provide decent, affordable housing	<p>The policy specifically states that 810 housing units, of a mix of dwelling types, tenure and sizes, will be delivered in the area over the plan period. 300 of these units will be delivered at</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>the Preston Barracks site, with the remainder spread throughout the development area (to be allocated in Part Two of the City Plan. This is less than previous iterations of the policy however is still considered to result in positive outcome against this objective. The SA assumes that housing will be increased elsewhere in the city to make up the shortfall. A proportion of affordable units in accordance with CP20 will be delivered, therefore having a positive impact on this objective. In addition, the delivery of bedspaces for students will have positive implications in relation to provision of student accommodation, as well as having indirect impacts on existing housing stock, e.g. through less need to rely on HMOs for student accommodation.</p>			
6) Reduce amount of car journeys	<p>See also Ob2. There are various positive measures within the policy including; the fact that the DA is situated on a sustainable transport corridor which is already served by good public transport; the commitment to investment in bus, cycle and pedestrian routes along and across Lewes Road and by ensuring that strategic allocations are supported by sustainable transport infrastructure. In addition, measures to improve the Falmer interchange, may help to ease congestion. The supporting text also suggests that re-routing of buses may be required in order to support major development, and this would also bring about positive impacts.</p> <p>However, as described under Objective 2, the different types of developments described within the policy may lead to an increase in car ownership in the area, or may increase the number of journeys by vehicles, that are made to/from and within the area, including employment-based journeys, such as freight. In addition, any increase in traffic is likely to result in increased noise levels, which are already high in this area, (over 75 decibels in some locations) as outlined by the DEFRA road noise mapping exercise.</p> <p>Although part of the Community Stadiums approved transport strategy and assessed as acceptable, a car park at the Falmer Released Land site will result in an increase in car journeys to the area at certain times.</p> <p>The cross-cutting policy for sustainable transport (CP9) should help to mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures.</p>	-	-	--
7) Minimise risk of pollution to water	<p>Indirect impact. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city. The development area mainly consists of urbanised areas, although is adjacent to some areas of open space. Any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, a problem in itself, and can lead to pollution of groundwater. In addition, contaminants in the soil can be disturbed during construction, which can leach into groundwater.</p> <p>The SFRA 2012 states that the site is at risk of surface water flooding in both the 1 in 30 and 1 in 200 year events. The SFRA also shows there is a major surface water flow path, mostly coinciding with the A270, with many small local streets adjacent to the A270 at risk as well as</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>the potential for significant areas of ponding around the Level. Site specific flood risk assessments would need to be carried out to ensure flood risk is not increased elsewhere as a result of development.</p> <p>The SA recognises the new requirement relating to protection of groundwater should result in positive impacts against this objective, however the risk of surface water flooding remains, resulting in a mixed score.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk and should be addressed under CP1 and CP10. Opportunities for biodiversity based SUDS should be encouraged where possible. If development is situated in areas highlighted at being of risk, then the development should be sequentially planned.</p> <p>The SA notes that the previous recommendation relating to control of runoff on Greenfield sites was implemented and is welcomed.</p>			
8) Minimise use of water	<p>Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>CP1 and SPD08 should ensure that water consumption is minimised. The SA notes that there is a requirement under Woollards Field to achieve "Excellent" BREEAM and this will ensure that high standards in terms of water reduction are met on this site.</p>	-	-	-
9) Promote development of contaminated land	<p>The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage. Further investigation at planning application stage should ensure that any contamination is identified and steps taken to remediate it.</p>	+	+	+
10) Manage coastal defences	<p>Development within this area is unlikely to have any impact on the coastline, therefore there is no impact with this objective.</p>			
11) Employment: balance needs of tourists, residents and businesses	<p>The policy is likely to have a positive impact on this objective. The policy should result in delivery of 15,600sqm additional employment floorspace over the two strategic allocations. In addition, the policy seeks to secure 16,000sqm of additional academic floorspace to be delivered over the Preston Barracks site. Development of any kind will help to bring about employment opportunities at construction stage, and additional employment floorspace will help to meet the employment/office needs of the city enabling the economic base of the city to grow. The SA also notes that the allocation on the Woollards Field site now includes some flexibility to allow for alternative employment generating uses which is considered positive in the current economic climate.</p> <p>All strategic allocations require the developers to agree to secure training for local people, which could help to reduce employment and skills based deprivation locally, as well as increase local people's long-term employment opportunities.</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	In addition, expansion of the University sites will help the Universities to continue to attract students to the city, and generate additional employment opportunities both on site and elsewhere, recognising the significant role the Universities play in the local economy.			
12) Support economic development	The policy is likely to lead to an increase in employment floorspace, making a significant contribution towards the city's assessed needs of new employment floorspace. This will lead to an increase in economic activity both at construction and operational stage and therefore have a positive impact on this objective. Expansion of the universities will lead to increase in the student economy, which is significant in Brighton & Hove. The policy recognises the fact the Lewes Road District Centre is underperforming and the comprehensive design guide for the area will help to influence future development proposals and therefore improve the local shopping environment. In addition, improvements to sustainable transport and public realm will help to revitalise the shopping district. As described in Ob11, strategic sites will be required to secure training for local people.	+	++	++
13) Improve health	Overall, in the short/medium term there should be positive implications for health resulting from delivery of this policy. The provision of housing and employment, are both wider determinants of health, and the provision of training for local people, should improve employment prospects of local people. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being, particularly through added biodiversity along the route. Improved sustainable transport infrastructure, as well as improved cycle and pedestrian routes will improve access to services and may help to reduce journeys made by car. There may be implications for health of neighbouring communities during construction of any development, however the requirement for all strategic sites to undergo a HIA in accordance with CP18 should minimise any potential impacts. However, in the long term, the potential increase in traffic remains a concern, as this could result in a negative impact on health, due to increased risk of road accidents, reduced air quality and increased road-related noise, resulting in mixed impacts in the long term, although the SA recognises that improvements to air quality and noise are priorities of the area.	+	+	-/+
14) Integrate health and community safety	One of the key local priorities is to secure improvements to community safety. Community safety is likely to be improved through proposed improvements to open spaces in the area, including Saunder's Park, William Clarke Park and under-used open spaces in Moulsecoomb and Bevendean. In addition, improvements to the public realm in the south Lewes Road area should also help to improve/reduce community safety issues as identified in the Community Safety, Crime and Drugs Audit 2004.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The Lewes Road Development Area crosses areas and neighbourhoods with varying levels of deprivation. According to the Index of Multiple Deprivation 2010, in the overall domain score, Moulsecoomb and Bevendean ward contains 2 Super Output Areas (SOA) that are within the 10% most deprived in England and are the 8 th and 10 th most deprived SOAs in the	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>city. The Hanover & Elm Grove ward contains 1 SOA that is within the 10% most deprived in England and is the 18th most deprived SOA in the city. The Hollingbury & Stanmer ward contains 3 SOA that are within the 10% most deprived in England and are the 4th, 7th and 16th most deprived in the city.</p> <p>There are numerous issues relating to inequalities found within these neighbourhoods, including high levels of obesity, teenage pregnancy and unemployment, and low educational attainment. There are positive measures that should help to reduce inequalities throughout the Development Area including securing provision of a community building and increased employment opportunities, which is one of the key local priorities for the area. In particular, strategic developments will be required to secure training for local people. Improved sustainable transport will also help to improve access to services.</p>			
16) Engage local communities	Development for the area will be subject to community engagement and public consultation.	+	+	+
17) Make the best of previously developed land	The Preston Barracks site is situated on PDL, some of which currently has no productive uses on site, and therefore re-development of this site would have a significantly positive impact on this objective. The situation is similar for the Falmer Released Land. However, Woollards Field is a Greenfield site and therefore redevelopment of this site would not be making the best of previously developed land and would have a negative impact against this objective, resulting in mixed impacts.	-/+	-/+	-/+
18) Sustainable energy	<p>Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies.</p> <p>The Preston Barracks strategic allocation requires development to be zero carbon, and this should result in positive impacts against this objective. The Woollards Field Strategic Allocation, also requires the development to be zero carbon, and be BREEAM outstanding, as it is a Greenfield site.</p> <p>Elsewhere across the development area, CP8 will require all new residential development (major development) to achieve zero carbon status, as well as requiring various standards in either CSH or BREEAM depending on the type and size of development. In addition, the SA notes the new requirement which encourages developers to consider low and zero carbon decentralised energy, in particular heat network infrastructure, which strengthens the assessment further against this objective. In addition, the government's target for all new residential development to be zero carbon by 2016 and all new non residential development to be zero carbon by 2019 will also help to ensure a positive impact against this objective in the medium to long term.</p>	+	+	+
19) Taking account of the changing climate	<p>New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change.</p> <p>The SA notes that the former SA recommendation relating to Woollards Field, which is a</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	Greenfield site, relating to runoff rates and reducing the heat island effect has been implemented, and therefore the impact on this objective is considered to be more positive, than previous iterations, however overall the impact is considered to be mixed. In addition, CP8 requires all development to be able to respond to changing needs as well as makes provision for off-site tree-planting and sustainable drainage.			
20) Meet BREEAM / Code for Sustainable Homes	Development at Woollards Field requires BREEAM Outstanding, as this is a Greenfield site. Development at Preston Barracks is required to be zero carbon, which will inadvertently require high standards to be met. Other development across the area will be required to meet standards set out in CP8. This is considered to have significant positive impacts in the medium to long term.	+	++	++
21) Increasing accessibility	The policy should have a positive impact on this objective. The Development Area is located on a sustainable transport corridor, to which improvements will be made through implementation of the policy, which will improve access to services. In addition, the policy will also result in a variety of developments and infrastructure, including a community building, housing and employment opportunities, thereby increasing provision and access. The policy should result in improvements to the retail environment and district centre, including accessibility.	+	++	++
22) Reduction of waste	Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

DA4 – New England Quarter and London Road area

Policy DA4 now contains three strategic allocations. The Strategic Allocation C1, provision for 20,000 sqm net additional B1 office floorspace names 5 sites and indicates minimum amounts of development for each site, or states where there should be no net loss. The option of delivering B1 development on a number of sites was assessed as option 2(i) in the Employment Options Paper (October 2011) against two alternative options of either identifying the Development Area as a broad location for B1 development, or the strategic allocation of two sites to accommodate the development.

The option to specifically allocate employment sites within Development Area policies was assessed as option 4(ii) in the Sustainable Economic Development Options Paper (October 2011) against the alternative option 4(i) of not allocating employment sites.

The Sustainability Appraisal of these options found option 2(i) and 4(ii) to be the preferred options.

For assessment purposes, it is presumed that the quantum of development outlined in the policy are viable and will be delivered.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Direct impact. There are a significant amount of open spaces and habitats surrounding the development area, including the railway sidings at Brighton Station, which are an SNCI, The Level to the south, and Preston Park to the north. The London Road/Preston Road corridor is also lined with mature street trees of a variety of species which help to create a green approach to the city. As the policy is concerned with development, some of which is significant, there may be potential to harm existing biodiversity and habitats present in the area, although development also provides the opportunity to enhance existing biodiversity if particular features are incorporated, as well as provide opportunities to create links to the existing green infrastructure network. It is considered unlikely that development/redevelopment located at the strategic allocations would have an adverse impact on biodiversity.</p> <p>As the policy contains a specific priority to ensure connections are made between existing open spaces and greenways, and enhances biodiversity in the areas, the impact on this objective is found to be positive in the medium to long term.</p> <p>CP8 and CP10 should also ensure effect of new development is positive and enhances biodiversity.</p>	-	+	+
2) Improve air quality	<p>Direct impact. The DA was chosen due to its location on a sustainable transport corridor, therefore having good existing access to existing public transport (both bus and train). However the development area is situated with the AQMA (2008) and the 2012 Air Quality Progress Report identified an exceedance in the annual mean NO2 levels at various monitoring locations in this area with diffusion tube C21 "Viaduct terrace" having the second greatest exceedance in the city. The current layout of the street particularly around the London Road Town Centre area, causes air to be trapped at street level, reducing dispersal of pollutants, known as the canyon effect.</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>The policy includes a priority relating to improving air quality, which is welcomed, and provides additional detail of how improvements to air quality will be achieved, including achieving a modal shift. However, the policy proposes certain amounts of development, including 1185 residential units and 20,000sqm of additional employment floorspace, as well as redevelopment of currently derelict or underperforming sites. This additional amount of development in the area is likely to have some impacts on the number of journeys made to the area and congestion, with potential for associated impacts on air quality either within the development area or on key roads within the surrounding area.</p> <p>The SA recommends development should ensure that sensitive receptors are located away from the roadside and also suggests that the area would be suitable for low-car or car-free housing due to its location. Monitoring at the diffusion tube sites will help to measure the impact on air quality.</p> <p>In addition to the priority of air quality in the policy, CP9 should minimise the impact on air quality.</p>			
3) Maintain local distinctiveness	<p>Direct impact. There is a range of different typologies of open space situated within or in close proximity to this development area, however as the Open Space, Sports and Recreation Study 2008 and the Open Space Study Update 2011 show, additional open space of all typologies will be needed to meet the needs of the future population in the St Peters and North Laine ward and any development of either housing or commercial uses must ensure that the open space requirements of the future population can be met. It is questioned whether the open space requirements of the increased population resulting from the increase in residential units and employment space will be able to met within the Development Area and how pressured the existing areas of open space or those near to the Development Area will become. There is no reference to provision of open space in the policy, reflecting the negative score in the medium and long term although it is recognised that the policy does require enhancements to open space, which was recommend by the SA at the last stage.</p> <p>CP16 should ensure the open space requirements are met.</p> <p>The policy should help to maintain and improve local distinctiveness, with particular emphasis on revitalising the London Road shopping area, reflecting the positive score. Any development, particularly tall buildings which have been identified as being suitable for this area, should consider the impact on neighbouring conservation areas, as well as historic buildings located within the area, including The Duke of Yorks' cinema and St Bartholemew Church. It is considered unlikely that development/redevelopment located at the strategic allocations would have an adverse impact on the historic built environment.</p> <p>In addition, CP12, CP13 and CP6 should ensure this issue is addressed.</p>	+	-/+	-/+
4) Protect South Downs	No impact. Development within the built up boundary of the city is unlikely to have any impact on the South Downs, although any tall buildings could impact on views of or from the			

SA Objective	Summary of effects	Short term	Medium term	Long term
	Downs.			
5) Provide decent, affordable housing	Direct impact. The policy states that 1185 residential units will be delivered in the area over the plan period and is based on the SHLAA update 2012. This is a small increase from previous iteration of the policy. It is understood that the majority of these are expected to come forward in the short/medium term. This will include a proportion of affordable units, therefore having a positive impact on this objective. The policy should also lead to the delivery of student housing, which not only has positive implications for the student community, but also helps to reduce the reliance on the need for privately-let HMOs.	++	++	++
6) Reduce amount of car journeys	Direct impact. Also see objective 2. As described, the situation of the development area to good existing modes of sustainable transport means that the area is well-placed to support this scale of development. In addition, the proposals to locate mixed-use development within the area should help to reduce the need to travel by car and new employment opportunities arising could potentially lead to an overall reduction in out-commuting (city-wide). However, the delivery of 1185 units of housing may cause a significant increase in car ownership in the area, unless a large proportion of units are low-car/car free or are accompanied by substantial sustainable transport options and this location is considered to be particular suitable for this type of housing. The delivery of 20,000sqm of new office floorspace, and redevelopment of 14,000 sqm at the Preston Road sites is also likely to cause an increase in people travelling to the area for employment purposes, employment-related journeys (freight etc) as could improvements to the shopping area. As this is one of the main entry points to the city for people travelling by car, the area could also suffer from further congestion from visitor-based development elsewhere in the city. It is noted that priority 7 refers to improving the pedestrian and cyclist environment and that priority 6 specifically refers to achieving a modal shift through improvements to bus, pedestrian and cyclist routes, which is welcomed, and that the importance of the National Cycle Route 20 is recognised. In addition, the cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy.	-	-	--
7) Minimise risk of pollution to water	Indirect impact. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city. The development area mainly consists of urbanised areas, although is adjacent to some areas of open space. Any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, a problem in itself, and can lead to pollution of groundwater. The SFRA 2012 shows that the eastern edge of the site along London Road and adjacent streets are more susceptible to surface water flooding in the 1 in 200 year event and that a site specific flood risk assessment would need to be carried out to ensure flood risk is not increased elsewhere. New development provides the opportunity to incorporate SUDS to help reduce the risk and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible. If development is situated in areas highlighted at	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	being of risk, then the development should be sequentially planned. In addition, contaminants in the soil can be disturbed during construction, which can leach into groundwater. Further investigation at proposal stage should ensure that any contamination is investigated and remediated.			
8) Minimise use of water	Indirect impact. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. CP8 and SPD08 should ensure that water consumption is minimised with SPD08 recommending new build residential reach level 4 CSH and non residential meet 60% BREEAM (for major developments).	-	-	-
9) Promote development of contaminated land	Direct impact. The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage. A substantial amount of remediation work has been carried out as part of the Brighton Station/New England Quarter redevelopment which is now nearing completion.	+	+	+
10) Manage coastal defences	There is no impact on this objective. The Development Area, including the strategic allocations are not situated in an area at risk of tidal flooding.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. The policy is likely to have a significant positive impact on this objective in the medium to long term, as the main aims for the area is to create a major new business quarter for the city, as well as revitalise the shopping area of London Road Town Centre, which was found to be underperforming in the Retail Study Update 2011, both of which are likely to result in employment opportunities. The policy contains three strategic allocations, over which the policy seeks to provide 20,000sqm new office floorspace, the upgrade and refurbishment of New England House, and the replacement of the existing 14,000sqm of floorspace on the 125-163 Preston Road site. Development at this level will create opportunities for employment at both construction and operation stage. The allocation of 20,000sqm now names five sites over which this will be delivered and the SA considers this is more likely to result in development being brought forward than with previous iterations of the policy where only two sites were anticipated (and not named). Strategic Allocations C1 and C3 are also both proposing mixed use development with a number of residential and are therefore not considered to have a negative impact on housing land supply. The IMD2010 shows employment deprivation to be an issue in some LSOA within the Ste Peters and North Laine ward and increased employment opportunities locally could help to reduce deprivation in this domain. The SA notes that the policy now includes a specific	++	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	requirement to provide training for local people, which would potentially help to reduce employment-based deprivation.			
12) Support economic development	Direct impact. As with Objective 11, the policy would have a significant positive impact on supporting economic development, particularly in the medium to long term. Various sectors should benefit, including the retail sector, including small independent traders through a variety of improvements including streetscape and public realm improvements thus improving the attractiveness of the area to shoppers, as well as the increased retail provision, and the creative digital and information technology industries cluster located in this area through provision of affordable and appropriate workspace, and particularly through the allocation of New England House. An increase in local population, caused by an increase in housing numbers is also likely to support economic development in the area.	++	++	++
13) Improve health	Direct impact. There should be a range of positive implications for health resulting from delivery of this policy, due to the provision of housing and employment, both of which are wider determinants of health, as well as through improved access to services through increased retail provision. Improvements to the public realm and townscape and overall appearance of the area will contribute towards improved well-being and provision of training could help improve employment prospects for local people. However, air quality is an issue in this area, particularly around the London Road corridor and any increase in traffic resulting from delivery of the policy would have implications for health, including the impact of noise on health. It is noted that the policy includes the requirement to ensure developments do not increase the number of people exposed to poor air quality or traffic noise which is welcomed, however the impact of increased traffic on air quality, noise and health remains a concern. One LSOA situated within the St Peters & North Laine ward ranked in the most 2.4% deprived in the UK (domain of health) and this should be monitored.	+	-/+	-/+
14) Integrate health and community safety	Indirect impact. The policy does not directly reference community safety, despite crime scoring highly in the IMD 2010. The Local Action Team for the area identifies a range of anti-social behaviour as being prevalent in the area, including street-drinking and drug use. New developments, particularly those of a mixed use nature, should help to increase natural surveillance, and any general improvements to the area are likely to lead to an increase in footfall, both of which can contribute to improving community safety. Improvements to public realm, pedestrian routes and cycle routes, should help to improve road safety, which is an issue in this area, particularly around the Preston Circus junction.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	Indirect impact. The area is situated within the wards of St Peters and North Laine and Preston Park. The IMD 2010 shows that there are LSOA within the St Peters and North Laine ward (E01016964) within the Development Area that have significant levels of deprivation in certain domains, including income deprivation facing older people, employment, living environment, crime, health and employment, all of which fall within the 10% most deprived in the UK and much higher in some cases. The LSOA score for	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>outdoors living environment is the worst in the city (measured by air quality and road traffic accidents).</p> <p>The shopping area in particular is likely to be the shopping destination for people from a variety of differing neighbourhoods, with different shopping needs, including those from the more affluent Preston Park ward, and those from the Mouslecoomb, Bevendean and Turner areas, as well as from within the area itself. It is important that any improvements to the retail offer continues to meet these needs in order to contribute towards reducing deprivation. The policy could help to reduce deprivation, particularly in the domains of the living environment and employment, and should make some contribution to improving health and reducing crime, as described in (13) and (14) above.</p>			
16) Engage local communities	There is significant opportunity for community engagement through delivery of this policy.	+	+	+
17) Make the best of previously developed land	Direct impact. All of the Strategic Allocations and much of the development area is situated on previously developed land, therefore the policy provides the opportunity to maximise use of PDL, particularly existing under-utilised sites.	+	+	+
18) Sustainable energy	<p>Direct impact. Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies.</p> <p>However, the new policy requirement for heat network infrastructure, based on the findings of the Energy Study, in addition to government requirements from 2016/2019 should ensure the impacts of the policy are positive, with this expected to be significantly positive in the longer term.</p>	+	+	++
19) Taking account of the changing climate	<p>Indirect impact. The area is away from the coastal frontage, therefore is not at risk of coastal flooding, however parts may be at risk to surface water flooding, which could increase as a result of climate change. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change.</p> <p>CP8 requires all development to be able to respond to changing needs.</p>	-	-	-
20) Meet BREEAM / Code for Sustainable Homes	<p>Indirect impact. New development could fail to achieve high environmental standards and there is no specific reference for development within the area to meet specific standards.</p> <p>CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.</p>	-	-	-
21) Increasing accessibility	Direct impact. The policy should have a positive impact on this objective. The policy will result in a variety of developments and infrastructure, including housing and employment opportunities, as well as an increase in the retail offer, thereby increasing provision and access. In particular, links between the development area and the North Laine will be improved, helping to link the area with central Brighton, and links between existing open space and new greenways will also be improved.	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
22) Reduction of waste	Indirect impact. Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised at source.	-	-	-

Policy DA5: Eastern Road and Edward Street

The policy contains four strategic allocations: Royal Sussex County Hospital, Edward Street Quarter, Circus Street site and Freshfield Road Business Park & Gala Bingo Hall site. The Circus Street site and Freshfield Road site were put forward for inclusion as additional strategic allocations in the Sustainable Economic Development Option Paper, October 2011.

The option to specifically allocate employment sites within Development Area policies was assessed as option 4(ii) in the Options Paper against the alternative option 4(i) of not allocating employment sites. The Sustainability Appraisal found option 4(ii) to be the preferred option.

The Freshfield Road Business Park Strategic Allocation includes the Gala Bingo Hall site, with the policy outlining that this site is expected to deliver housing and that the Freshfield Road area is unlikely to undergo re-development, but will be improved to increase efficiency.

The SA notes that the quantum of development to be delivered have been amended from the previous iteration in response to findings from up to date studies (Employment Land Review) and evidence from landowners relating to viability.

For assessment purposes, it is presumed that the quantum of development outlined in the policy are viable and will be delivered.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impacts. One of the key local priorities of the policy is to enhance urban biodiversity throughout the area, which is likely to have a positive impact on this objective, including a specific reference to increasing tree planting. The policy is concerned with new development, the majority of which will take place over the strategic sites, none of which are situated in close proximity to any SNCIs or adopted greenway. Development is therefore considered to provide the opportunity to enhance biodiversity throughout the area. In addition, CP8 and CP10 should also ensure effect of new development is positive and enhances biodiversity.	+	+	+
2) Improve air quality	Direct impact. The DA was chosen due to its location on a sustainable transport corridor, therefore having good access to public transport. There are a number of measures contained within the policy that should help to improve local air quality including: promotion and investment in sustainable transport, transfer of road carriageway, improvements to public realm, and infrastructure to allow the introduction of a rapid bus service. In addition, improving air quality is one of the area's local priorities. The strategic allocations are also required to provide improvements to sustainable transport infrastructure and the re-development of the RSCH will involve a transport feasibility study, which will consider reducing and re-routing traffic along Eastern Road, which may lead to improvements in local air quality, although may simply displace traffic and its associated	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>issues and this will need to be investigated as part of the study. Much of this area has reasonably good air quality and the majority of this transport corridor is quite wide which aids dispersal. Exceptions are opposite the hospital on Eastern Road where concentrations remain above the limit value for NO₂ however the entire area remains within the AQMA. Despite the positive measures outlined in the policy, there is a risk that air quality could worsen, either as a result an increase in private motor vehicles that could be associated with residential development in the area, or from people travelling to/from the area for employment purposes or to access hospital facilities.</p>			
3) Maintain local distinctiveness	<p>Direct impact. The area along Edward Street and Eastern Road comprises different sections with varying characteristics. The policy will seek to improve the public realm and townscape and seeks to ensure development will respect the diverse character of an area and preserve buildings of historical interest. There are a number of Conservation Areas located throughout or adjacent to the area and the strategic sites, including Valley Gardens, East Cliff and College Conservation Areas. The policy refers to the fact that the area contains various heritage assets and the SA notes that all the Strategic Allocations require either the existing townscape or historic built environment to be considered in the design of development.</p> <p>One of the local priorities for the area is to invest in open space. Currently, existing open space does not meet existing needs in the Queens Park ward across the majority of typologies and this is likely to worsen with any increase in population locally, reflecting the mixed negative and positive impacts in the long term. This should be addressed through CP16.</p>	+	+	-/+
4) Protect South Downs	There is not considered to be any direct impact on this objective.			
5) Provide decent, affordable housing	<p>Direct impact. The policy states that a minimum of 470 residential units will be delivered in the area over the plan period, which is less than previous iterations of the policy and reflects updates to the SHLAA and viability evidence. The majority of this housing is anticipated to come forward across the strategic allocations. This will include a proportion of affordable units, therefore having a positive impact on this objective. In addition, the delivery of rooms for students will have positive implications in relation to provision of student accommodation, as well as having indirect impacts on existing housing stock, e.g. through less need to rely on HMOs for student accommodation. Although the amount is lower than previous versions, the impact is still considered to be significantly positive in the medium to long term. The SA notes that the housing requirements of the city and city plan housing target still needs to be met and that the reduction in housing to be delivered in this location will need be addressed through additional housing delivered in other locations.</p>	+	++	++
6) Reduce amount of car journeys	<p>Direct impact. It is recognised that the policy contains a number of positive measures: the DA was chosen due to its location on a sustainable transport corridor, therefore having good access to public transport; and the policy proposes improvements to public realm, promotion and investment in sustainable transport (including walking and cycling) as well as ensuring</p>	-	--	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>infrastructure is in place for a rapid bus-based scheme in the long term. In addition, the policy suggest road carriageway transfer to sustainable forms of transport and requires a study into the feasibility of reducing and re-routing traffic along Eastern Road to be carried out, in conjunction with the strategic allocation of the RSCH.</p> <p>However, the policy includes a variety of different types of developments, all of which are likely to put increased pressure on transport infrastructure available, or may result in an increase in people travelling to the area, or increase car ownership in the local area (associated with residential development). In addition, the status of RSCH as a sub-regional destination for hospital services may increase car or other journeys into Brighton further. The impact is considered to be more significant in the medium term, becoming less significant in the long term due to anticipated delivery of the rapid transport scheme. Increased car journeys would also lead to an increase in noise levels produced by road traffic which have already been measured as between 65-69.9 decibels along the roadside in this area (DEFRA noise mapping), as well as potentially having other health and safety implications.</p> <p>The cross-cutting policy for sustainable transport (CP9) should mitigate against the anticipated negative impacts of this policy, through seeking to achieve modal shift throughout the city, as well as promoting other measures, including promoting car free or low car housing.</p>			
7) Minimise risk of pollution to water	<p>Indirect impacts. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city. Contaminants in the soil can be disturbed during construction, which can leach into groundwater and would need to be investigated as part of the planning process.</p> <p>The development area mainly consists of urbanised areas. Any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, a problem in itself, and can lead to pollution of groundwater. The SFRA 2012 shows that parts of the area are at risk of surface water flooding in both the 1 in 30 and 1 in 200 year event. The area around the Circus Street site is more susceptible (deeper water) to surface water flooding in the 1 in 200 year event. The area around Freshfield Road and Stevenson Road are shown to have an intermediate susceptibility to surface water flooding. The remainder of the area is not susceptible to surface water flooding.</p> <p>The SA notes that the supporting text refers to the SFRA findings for the area and requires developments to demonstrate sequential planning.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk and flood risk should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>	-	-	-
8) Minimise use of water	<p>Indirect impacts. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly</p>	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	efficient water-saving technologies. CP8 and SPD08 should ensure that water consumption is minimised.			
9) Promote development of contaminated land	Direct impacts. The policy is likely to have a positive impact on this objective as the development area contains several pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage.	+	+	+
10) Manage coastal defences	There is no direct link with this objective.			
11) Employment: balance needs of tourists, residents and businesses	Direct impacts. The policy is likely to have a significant positive impact on this objective over the plan period as the policy includes delivery of 23,200sqm of employment floorspace over the Amex and Circus Street sites, some of which will be affordable workspace, a Dance Studio and 74,000sqm of hospital floorspace, as well as additional ancillary uses, including retail. All will generate employment opportunities both at construction and operation stage. The SA notes that the amount of employment floorspace to be delivered is less than the previous iteration of the policy and reflects updates to the Employment Land Study and viability evidence from the landowner. However, this does make the potential for positive impacts to be less certain. It is understood from the Employment Land Study Update that the Freshfield Road Business Park is currently well-used and the SA notes the change of approach to this site from previous iterations to improving existing provision to make more efficient use of the site, rather than a more comprehensive re-development as was previously considered. The SA still considers that this will have positive impacts for this objective, as more efficient use of the site may potentially create job opportunities. The policy is now more likely to have a positive impact on residents, through creation of employment opportunities, rather than attracting tourists to the city, with creating employment opportunities for local communities one of the local priorities. In addition, all strategic allocations are required to secure training for local people. The SA notes that a large amount of employment floorspace will be required to meet the future needs of the city, and that the reduction in this location will need to be addressed through allocations elsewhere.	+?	++?	++?
12) Support economic development	Direct impacts. As with 11 above, the policy is likely to have a significant positive impact on this objective, with the policy delivering a large of amount of additional employment floorspace, or floorspace that will have positive impacts for the local economy, however that the potential for positive impact is uncertain, due to the reduction in employment floorspace to be delivered. Positive aspects of this policy include the benefit for other sectors, with tourism and hospitality sectors benefitting from improved access between the area and the seafront. The delivery of a dance studio, as well as affordable managed workspace will be of benefit to the creative industries sector.	+?	++?	++?
13) Improve health	Indirect impacts. On balance, there should be more positive implications for health resulting	+	+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>from delivery of this policy in the short and medium term. This is due to the provision of housing and employment, both of which are wider determinants of health. In addition, the provision of additional facilities at the RSCH and the provision of a new GP surgery will also have benefits in terms of access to health facilities. Any improvements to the public realm and townscape and overall appearance of the area will contribute towards improved mental well-being and would also support more sustainable travel, having wider benefits for health. However, should the policy result in an increase in traffic to or within the local area in the longer term, then this would have negative implications for health, including health impacts resulting from air quality, noise or safety. In addition, the re-routing of traffic from Eastern Road to alternative routes could have a negative impact on surrounding communities if the existing problem is simply displaced, rather than traffic reduced and this will need to be assessed as part of any feasibility study.</p>			
14) Integrate health and community safety	<p>Direct impact. According to the IMD2010, crime based deprivation is the 2nd worst in the city, in one of the LSOAs that is located within the Development Area. Improving community safety is a key priority for the area. In addition, the creation of active frontages can have a positive impact on crime reduction and community safety.</p>	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Indirect impact. There are three areas that were designated as neighbourhood renewal areas that are situated adjacent to the development area; Bristol Estate, Queens Park & Craven Vale, and Tarner, all of which have varying priorities and some significant levels of deprivation. The policy should help in tackling issues that have been identified as priorities within the Neighbourhood Action Plans including, tackling community safety, provision of community facilities, and lack of activities for children/young people.</p> <p>The development area is mainly situated within the Queens Park ward, which has significant levels of deprivation across various domains. Seven of the nine LSOAs that make up Queens Park ward fall within the boundary of the Development Area and six of these fall within the most 20% deprived LSOAs in the UK. However, more significant is the fact that two of the LSOAs are ranked as 2nd and 3rd most deprived in the city, (overall domain) and the most deprived in the city in the domains of employment and health.</p> <p>The policy is likely to have a positive impact on narrowing the gap and reduce inequalities through a variety of infrastructure that will be delivered or improved through implementation of the policy, e.g. community building, GPs practice, youth facilities and additional school floorspace. All of these will be needed to meet the needs of the predicted increase in population resulting from increased housing in the area as well as meeting existing needs. In addition, the policy recognises that training opportunities must be created for local people, particularly in relation to the strategic developments, which again should help reduce deprivation through improving skills and job opportunities. There may also be opportunities to reduce fuel poverty, through implementation of district heating, which could benefit people throughout the local area.</p>	+	+	+
16) Engage local	<p>Indirect impact. There is significant opportunity for engagement of the community through</p>	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
communities	delivery of this policy, particularly due to the range of community infrastructure that is planned to be delivered.			
17) Make the best of previously developed land	All of the sites identified within the policy are areas of previously developed land. The policy makes specific reference to using the land at Freshfield Business Park more efficiently. The SA notes that higher density levels in relation to housing are expected to be delivered within Development Areas, which again should make more efficient use of land.	+	+	++
18) Sustainable energy	Direct impact. Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the SA recognises that policy now contains a specific requirement to implementing district heating in the area, resulting from the findings of the Energy Study, and this should help ensure that sustainable energy systems are delivered, having wider benefits, resulting in the significant positive impact in the long term. In addition, the requirements of CP8 and government targets for new homes to be zero carbon by 2016 and non residential development to be zero carbon by 2019 should ensure the impact is also positive.	+	+	++
19) Taking account of the changing climate	Indirect impact. The area is away from the coastal frontage, therefore is not at risk of coastal flooding, however parts may be at risk to surface water flooding, which could increase as a result of climate change. The policy should lead to additional green infrastructure, including substantial tree planting, which will help the city adapt to climate change, through contributing to reducing the urban heat island effect. Therefore a mixed impact is considered likely. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. However, CP8 requires all development to be able to respond to changing needs.	-/+	-/+	-/+
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no longer any specific reference for development within the area to meet specific standards, including the strategic allocation. There is no specific requirement within the policy to meet certain standards. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-
21) Increasing accessibility	Direct impact. The policy should have a positive impact on this objective. The Development Area is focused on a sustainable transport corridor, to which improvements will be made through implementation of the policy, which will improve access to services. In addition, the policy will also result in a variety of developments and infrastructure, including healthcare provision, a community building, housing and employment opportunities, and ancillary shops and services thereby increasing provision and access.	+	++	++
22) Reduction of waste	Indirect impact. Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	stage and other existing local and national policy should ensure construction & demolition waste is minimised.			

Policy DA6: Hove Station area

Policy DA6 contains one Strategic Allocation. The option of whether to specifically allocate employment sites within Development Area policies as strategic allocations was assessed as option 4(ii) in the Sustainable Economic Development Options Paper (October 2011) against the alternative option 4(i) of not allocating employment sites.

The Sustainability Appraisal of these options found option 4(ii) to be the preferred option.

The SA notes that the quantum of development have been amended from the previous iteration.

The SA assumes that all quantum of development are viable and deliverable.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. In general, the development area itself is currently lacking in biodiversity therefore the issue that development could have a negative impact on existing biodiversity is not considered to be of significance. Further development could lead to enhancements in biodiversity, should new developments incorporate features that attract biodiversity, and the policy now makes a specific requirement to improve biodiversity. In particular, any new biodiversity could link with existing areas of open space, including Hove Park, situated to the north of the development area, as well as other existing biodiversity that surrounds the development area. CP10 sets out the requirements in terms of provision of biodiversity features in new development.		+	+
2) Improve air quality	Direct impact. The SA recognises that the development area is located around good sustainable transport links, and that it also contains proposals for mixed-use development therefore potentially reducing the need to travel by car. In addition, one of the policy priorities is to enhance the sustainable transport interchange by improving the cycling and walking network and strengthening north/south and east/west connections. The area lies within the AQMA 2008 and monitoring results outlined in the 2012 Air Quality Progress Report shows that the annual NO2 levels to have exceeded the air quality objective at the Old Shoreham Road/Sackville Road junction (W21 diffusion tube). Several junctions in the area are at or near to capacity so any additional traffic associated with this level of development is likely to add to congestion and air quality. Although DA6 is not considered to be a worst case location for air quality in the city, any proposals for residential development within 15m of the road carriageway should consider the health impacts of air quality on residents. The additional amounts of development anticipated to be delivered in this location are anticipated to worsen air quality throughout the area.		-	-
3) Maintain local distinctiveness	Direct impact. Hove Station is situated within the Hove Station Conservation Area, with Hove Station itself being of Grade II listed status. However the remaining area within the development area is mainly modern industrial. The policy specifically requires development	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>to be of high quality design and be acceptable height and mass and is likely to lead to improvements to the public realm and townscape, leading to an overall improvement in local distinctiveness. The area is considered appropriate for mid-rise buildings and care must be taken not to have an adverse impact on adjacent conservation areas and buildings of historic interest. This should be addressed under CP12/13.</p> <p>Although there are no existing areas of open space within the development area itself, the development area is within the 720m buffer of most typologies of open space, as outlined in the Open Space Sports and Recreation Study 2009, and has Hove Park and Hove Recreation Ground situated to the north. The policy also requires public open space to be provided in the area. In addition, CP16 should ensure that the open space requirements of future residents can be met locally.</p>			
4) Protect South Downs	No impact. Development within the built up boundary of the city is unlikely to have an impact on the South Downs, although medium rise buildings could impact on views of or from the Downs.			
5) Provide decent, affordable housing	The policy is likely to have a significant positive impact on this objective, with the policy and SHLAA identifying the potential to build 630 units within the development area over the plan period, a proportion of which would be affordable.		++	++
6) Reduce amount of car journeys	<p>Also see objective 2. The policy contains a range of priorities which could lead to a reduction in the need to travel by car: the Development Area was chosen due to its proximity to modes of sustainable transport; proposed enhancements to the transport interchange through improvements to cycling and walking networks, improved access to the station, as well as improvements to the public realm; and the encouragement of mixed use developments in appropriate locations. However, the policy is concerned with a significant amount of new development (residential and employment) and this may lead to an increase either in car ownership in the area or journeys to/from the area for employment purposes, leading to an increase in congestion.</p> <p>There are already high levels of congestion in the area, with associated impacts on air quality, as well as increasing noise associated with road traffic which is already high at key junctions in this area (70-74.9+ decibels at Sackville Road/Shoreham Road junction). Proximity to the railway station and various bus routes, makes this area ideal for low or car-free housing and the SA welcomes the reference in the supporting text specifying that development will have to justify any proposals for parking, given its location. The cross-cutting policy on sustainable transport should mitigate against the potential negative impacts of this policy, through aiming to achieve a modal shift and reduction in car use.</p>		-	-
7) Minimise risk of pollution to water	Indirect impact. The SA considers the impacts on this objective to be positive. This area of the city overlies the Brighton aquifer which is a major source of groundwater that provides drinking water to the city and must be protected under the requirements of the Water Framework Directive. The SA recognises that the policy now specifically seeks the protection of groundwater and this is considered to bring about positive impacts. The	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>development area mainly consists of urbanised areas and any increase in non-permeable surfaces associated with new development may increase the risk of surface water flooding, which can lead to pollution of groundwater. However, the SA recognises that the policy also requires development to address surface water flooding risks and incorporate surface water drainage measures.</p> <p>The SFRA 2012 shows that the site is at risk of deeper surface water flooding in both the 1 in 30 and 1 in 200 year event, with the area around Goldstone Retail Park particularly susceptible. There is a major surface water flood path which flows along Goldstone Retail Park down to Conway Street and any development must ensure that this flow path is maintained to reduce the risk of flood risk elsewhere. Development should be sequentially planned in areas known to be at risk of flooding and SUDS should be built into any new design.</p> <p>New development provides the opportunity to incorporate SUDS to help reduce the risk of surface water flooding and should be addressed under CP8 and CP11. Opportunities for biodiversity based SUDS should be encouraged where possible.</p>			
8) Minimise use of water	<p>Indirect impact. Water resources are already under pressure in the south east and water consumption must be minimised as far as possible. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies.</p> <p>CP8 and SPD08 should ensure that water consumption is minimised.</p>	-	-	-
9) Promote development of contaminated land	<p>Direct impact. The policy is likely to have a positive impact on this objective as the development area contains pockets of land that have been identified as having potential for contamination due to former and historic uses which may have had the potential to cause localised contamination. Further investigation would need to be carried out at planning application stage.</p>	+	+	+
10) Manage coastal defences	<p>There is no direct link with this objective.</p>			
11) Employment: balance needs of tourists, residents and businesses	<p>Direct impact. The impact is likely to be significantly positive on this objective in the long term, with key aims of the policy to secure and create a high quality employment focussed mixed use area. However, the SA notes that the policy is now allowing a loss in employment floorspace on the strategic allocation, through the retention/replacement of only 12,000sqm on Conway Street (compared to 18,700sqm existing) and therefore in the development area as a whole. This is not considered to bring about negative impacts on this objective as it is understood that higher value or greater jobs density is anticipated from new employment generating floorspace to be delivered, particularly on the Conway Street site, however has led to the positive impact being more uncertain. The policy specifies that any loss should be minimised, which should help retain as much employment floorspace as possible. The policy now seeks to create employment and training opportunities for local people, which should bring about positive outcomes locally.</p> <p>The increase in housing units to be delivered in the area compared to former iterations of the</p>	+?	+?	++?

SA Objective	Summary of effects	Short term	Medium term	Long term
	policy is not considered to have a negative impact on employment land availability, as the SA recognises that the policy promotes mixed-use development and that residential may act as enabling development and seek to facilitate regeneration of the area.			
12) Support economic development	See objective 11. The impact is likely to be significantly positive on this objective in long term, with the regeneration of the existing employment opportunities in the area to help contribute to provide for the city's needs and this will help support the local economy, however, as described under 11, the reduction and loss in floorspace to be delivered locally makes the impact more uncertain. Positive aspects of the policy include: the support for various sectors of the economy, with particular reference to meeting the requirements of small businesses, creative industries and digital media, in terms of provision of appropriate, affordable workspace, which will help to meet their needs and recognises that Hove is an attractive location for businesses in the city. In addition, any increase in different types of development in the area is likely to have added benefits for existing surrounding businesses, e.g. through increased footfall.	+?	+?	+++
13) Improve health	The policy is likely to lead to a number of improvements which will have a positive impact on health including: provision of employment and training opportunities, and provision of housing, both of which are wider determinants of health; improved townscape which has associated impacts on general well-being; improved cycling and walking networks which may encourage a reduction in car-use and congestion, and may encourage physical activity. In addition, provision of community facilities, such as schools and sports, will help to develop sustainable communities, impacting on community health. However, as described under objective 2 and 6, the policy may lead to an increase in road traffic, with potential impacts on air quality as well as increased noise levels, having associated negative impacts on health. This is considered to be more likely in the longer term. There are two LSOA that cover the majority of the area of DA6, 1 in Goldsmid and 1 in Stanford, with two further LSOAs bordering the area. The LSOA situated in Goldsmid is located within the 5% most deprived in the UK under the health domain, with scores of 4.6%. Changes to this score over time may reflect impacts of the policy.	+	+	-/+
14) Integrate health and community safety	Direct impact. According to the IMD2010 crime is not a particular issue in the area, with the highest scoring LSOA being 55.7%, although the NAP for the Portland Road and Clarendon NRA identified the area around Conway Street as having community safety issues. The policy is likely to lead to improvements in community safety, with specific reference to securing public safety improvements. In addition, mixed use developments increase natural surveillance through increased footfall at different times of the day, therefore also leading to improved community safety.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The Clarendon area, which forms part of the Portland Road and Clarendon Neighbourhood Renewal Area, is situated within the Development Area. The Neighbourhood Action Plan for this area identifies anti-social behaviour, traffic management and poor quality streetscape as	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>issues. The policy makes reference to these issues and seeks to ensure that any new development will contribute towards public safety improvements. The Development Area is located within the Goldsmid and Stanford Wards which overall do not contain any significant levels of deprivation, however contains pockets of deprivation particularly located around the Clarendon area. The LSOA covering this area are found to be in the most 20% deprived (UK) in the domains for employment (14.2%), income deprivation facing older people (5.9%), health (4.6%), and living environment (4.3%).</p> <p>The policy could help to lead to improvements in some of these areas including employment through the policy requirement, which may impact on health and deprivation.</p>			
16) Engage local communities	There are significant opportunities to engage the local community through implementation of this policy.	+	+	+
17) Make the best of previously developed land	<p>Direct impact. All of the development area is situated on previously developed land. The policy is likely to lead to a significant positive impact on this objective, with the policy making specific reference to making more efficient use of under-utilised sites, and although the policy accepts a loss of employment floorspace, it is understood that this is to be replaced by higher value or greater job density. In addition, the area has been identified as having potential for tall buildings, with the policy making specific reference to mid-rise buildings being appropriate in this location. This will also help to increase the capacity of available land space.</p>	+	++	++
18) Sustainable energy	<p>Direct impact. Any new development or redevelopment will lead to an increase in energy use, therefore contributing towards climate change, unless measures are taken, either at design stage or through the incorporation of low/zero carbon technologies. However, the policy now requires development in this area to consider low and zero decentralised energy, such as heat networks, and this is considered to have positive impacts on this objective. In addition, government targets for all new residential to be zero carbon by 2016 and non-residential to be zero carbon by 2019 should ensure the impact is positive in the medium to long term.</p> <p>CP8 requires all new residential development (major development) to achieve zero carbon status, as well as requiring various standards in either CSH or BREEAM depending on the type of development.</p>	+	+	+
19) Taking account of the changing climate	<p>Direct impact. The area is away from the coastal frontage, therefore is not at risk of coastal flooding, however parts may be at risk to surface water flooding, which could increase as a result of climate change. The SA notes that the policy now requires development to address surface water flooding risks and is therefore considered to be more positive against this objective. However, new development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change, and could also exacerbate the urban heat island effect. CP8 requires all development to be able to respond to changing needs.</p>	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to achieve high environmental standards and there is no specific reference for development within the area to meet specific standards. CP8 requires various standards of either CSH or BREEAM to be met, which should reduce any potential for negative impact.	-	-	-
21) Increasing accessibility	Direct impact. The policy is likely to have a positive impact on this objective, becoming significant in the long term through improvements to the walking/cycling network, improvements to access to Hove Park, Hove Station and the surrounding transport interchange, and through the increase in employment opportunities in the area.	+	++	++
22) Reduction of waste	Any redevelopment or development will lead to an increase in waste at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised. The SA recognises the safeguarding of the waste management site to meet the future waste management needs of the city.	-	-	-

DA7 Toads Hole Valley

The DA7 Toads Hole Valley policy was first put forward in the draft City Plan, May 2012, which was subject to widespread consultation.

History:

The option to deliver a mixed-use development on the Toads Hole Valley site was put forward in the Housing Delivery Options Paper. This was subject to SA and was subject to widespread public consultation from October to December 2011. Four options were assessed in total. Option One did not include any development on the Toads Hole Valley site. Options Two, Three and Four all included delivery of a mixed-use development on the Toads Hole Valley site, all to provide approximately 700 units of housing. This policy builds upon the preferred option, Option Two, that was put forward in the Housing Delivery Options Paper as well as the policy that was subject to consultation at draft City Plan stage.

No alternative urban fringe sites have been considered or assessed by the SA. The work on the SHLAA 2009, as well as the technical paper on Housing which supported the withdrawn submission Core Strategy included the assessment of urban fringe sites and identified potential constraints. This process has been instrumental in choosing THV as the site to include as the Strategic Allocation and identified that there are no other reasonable alternatives for strategic opportunities to this site due to the constraints identified. As there are not considered to be any reasonable alternatives to this site, the SA has not carried out an assessment of THV against alternative urban fringe sites. See Appendix F for more details on the selection of this site.

For SA purposes it is assumed that development will be delivered in the quantum outlined in the policy and that it is viable at this level. It is assumed that development in this location will happen in the medium term.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	The policy involves development on a Greenfield site, Toads Hole Valley which is situated to the north of the city. There is a designated SNCI to the western edge of the site. The loss of any Greenfield site has potential to have adverse impacts on biodiversity, the significance of which can only be determined once an assessment of the ecological value of the site has taken place. When deciding on removing the site from the SDNP, the Inspectors Report of the Inquiry into the proposed SDNP (2008) ¹¹⁶ refers to a survey that stated the site is devoid of ecological interest, however this information may be out of date and a further study would be needed to clarify this.		-?	-?

¹¹⁶ <http://archive.defra.gov.uk/rural/national-parks/south-downs/key-docs.htm>

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>The SNCI was originally designated in 1995 and in 1999 a site survey described the site as “an important site for habitat diversity with scrub, woodland, rough grassland and a pond”.¹¹⁷ Although the SNCI will remain protected, development adjacent to it may impact on the value of the designated area, however it is recognised that the policy specifically refers to retaining and enhancing the designated SNCI. The status of all existing SNCIs in Brighton & Hove are currently being reviewed and it is anticipated that the results of the review will be able to inform the types of impacts development at this site would have on its status and what opportunities for enhancement development will be able to provide.</p> <p>Overall, the impact of the policy is considered to be negative uncertain. The SA recognises that development is likely to provide the opportunity to enhance biodiversity through incorporation of various features, and will provide the opportunity to enhance the Toads Hole Valley SNCI, however until the ecological state of the site and the review of the SNCI has been complete this remains uncertain and the risk of negative impact remains.</p>			
2) Improve air quality	<p>The policy incorporates delivery of both housing and office space, as well as other uses. The site is currently well served by the existing road network and this could impact on choices made regarding car ownership/journey mode. Delivery of housing is likely to increase car ownership in the local area, however it is recognised that the policy commits the parking on site to be guided by maximum parking standards and also requires a new public transport service to serve the development. The delivery of employment floorspace will increase journeys made to the area for work, therefore potentially having a negative impact on localised air quality.</p> <p>It is recognised that the site is situated outside the existing AQMA meaning that development in this location is unlikely to increase the amount of people exposed to poor air quality and although the site is adjacent to the A27, traffic flow on this road is normally good and the nature of the landscape ensures that air pollutants are readily dispersed.</p> <p>It is recognised that the policy requires sustainable transport links to be improved to the area, however the SA considers that air quality in this area, or at junctions around this area will worsen as a result of this amount of development in this area. In addition, the potential for the employment site to be an informal site for park and ride may increase potential for adverse air quality impacts at certain times.</p>		-	-
3) Maintain local distinctiveness and sites	<p>The policy is considered unlikely to have any adverse impacts on the historic built environment, including the adjacent Conservation Area of Woodland Drive. The density levels set by the policy are higher than those in neighbouring wards, which vary from approximately 10 to 30 dph, however it is recognised that higher density levels will need to</p>		+	+

¹¹⁷ Brighton & Hove SNCI Site Summary Sheet – Toads Hole Valley 1999

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>be achieved to accommodate the required development, and that density of between 50 to 75dph is still likely to be of low-rise and is lower than other development area policies. The policy should bring about positive benefits in relation to provision of open space, with the policy specifically requiring that children's play facilities, recreational space and allotments are provided for all of which were identified as being deficient in this area by the Open Space Study Update 2011. In addition, the site has suffered from illegal use by motor-cross bikes and the habitat has remained un-managed for a number of years, impacting on the landscape value of the site itself¹¹⁸</p> <p>The potential impacts on the SNCI are discussed under objective 1, and the potential impacts on the SDNP are discussed under objective 4.</p>			
4) Protect South Downs	<p>Local Priority A3 and guidance point C1d for the strategic allocation both refer to the SDNP. These points should seek to ensure that the setting of the SDNP is respected by development, and that development has regard to the purpose of the SDNP, which should ensure the conservation of its intrinsic beauty and to promote understanding and enjoyment of it. These points are welcomed by the SA. In addition, the density range set by the policy should ensure that views of or from the SDNP are not harmed. The policy also seeks to improve links to the National Park, through the delivery a multi-use community facility, including a resource that promotes links to the SDNP that as well as through improved pedestrian and cycle links. The SA considers the policy to incorporate protection of the SDNP and its setting and is therefore considered to be positive, however remains uncertain until an impact assessment of development proposals has taken place, and this should be required at various stages of the development process.</p>		+?	+?
5) Provide decent, affordable housing	<p>The policy should bring about significant positive benefits for this objective. The policy will result in the delivery of a minimum of 700 residential units, a proportion of which would be affordable. In addition, the policy specifies that at least 50% of housing delivered across the scheme will 3 or more bedroomed properties, which will contribute to helping to address the need for family housing.</p>		++	++
6) Reduce amount of car journeys	<p>As described under objective 2, car ownership and car journeys to/from the site are considered likely to increase as a result of this policy, as a result of the significant amount of development delivered having a negative impact on this objective. This is due to the sites' relatively good access to the existing road network, yet lack of existing public transport which may impact on choices over car ownership or travel choice. Previous travel trends seem to indicate this, with the census (2001) showing that over 60% of the Hangleton & Knoll households travelled to work by car, compared to 13% travelling by bus, with similar figures for the adjoining Withdean ward (56% and 10% respectively).</p> <p>However, the SA recognises the positive aspirations of the policy in terms of improving pedestrian and cycle links to the SDNP, improving links to adjacent residential areas, and</p>		--	--

¹¹⁸ Site Appraisal for Park & Ride, Peter Brett Associates, 2004

SA Objective	Summary of effects	Short term	Medium term	Long term
	requiring maximum parking standards. The SA also notes that the policy specifically requires the various transport, highway and safety impacts of the development be addressed through proposals and to improve the operational performance of the Devil's Dyke junction.			
7) Minimise risk of pollution to water	<p>The site is located within Groundwater Source Protection zone 2 (outer) which means that activities and discharges are restricted by the EA in order to protect the abstraction. It is also noted that the SFRA 2012 shows that the western edge of the site is at risk of deeper surface water flooding in the 1 in 30 and 1 in 200 year event. Greenfield sites play an important role in absorbing water. Development in this location will increase the amount of urbanised non-permeable surfacing. This could increase surface water flood risk on the site as well as elsewhere, and may lead to pollution of groundwater unless substantial SUDS are implemented.</p> <p>The SA notes that the previous SA recommendation relating to protecting sensitive groundwater source protection zones from pollution and ensuring the reduction of surface water run off and flood risk has been included as one of the priorities of the policy. As the policy now includes a specific requirement which should help reduce the risk of flooding and water pollution, the impact is now considered to be more positive, but still uncertain.</p> <p>The SA notes that the SFRA recommends that on Greenfield sites, runoff must be controlled to maintain the Greenfield runoff rates and the SA recommends that additional wording as added to the supporting text referring to this.</p>		+?	+?
8) Minimise use of water	Delivery of housing will increase consumption of water, as will delivery of other uses. The SA recognises that the supporting text sets out what should be achieved in ensuring the development meets exemplar standards of sustainable development, and meeting requirements relating to development on Greenfield sites. This should help to ensure that water consumption is minimised through incorporation of highly efficient water saving technologies.		+	+
9) Promote development of contaminated land	The potential for contamination on this site is unknown and would need to be investigated further at application stage.		?	?
10) Manage coastal defences	The policy has no direct impact on this objective due to its location.			
11) Employment: balance needs of tourists, residents and businesses	The policy will bring about temporary positive benefits in terms of employment opportunities at construction stage. The policy will also provide employment opportunities when the site is operational, through the ancillary supporting uses located on the site. In addition, the delivery of 25,000sqm of office floorspace, to meet a variety of needs, will help to secure the floorspace required in the city to meet future needs in the city, having wider economic benefits. The SA welcomes the inclusion of the policy requirement to secure training for local people, as should improve job prospects locally.		++	++
12) Support economic development	As with objective 11, the policy should help support economic development, at both construction and operation stages. Construction based jobs will be created, service sector jobs will be created in the ancillary uses, and the office floorspace created will help to ensure		++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	Brighton remains attractive to new businesses, as well as supporting existing local business requirements. In addition, the policy requirement for the employment floorspace to be delivered alongside the residential should help contribute to economic growth.			
13) Improve health	<p>Access to affordable housing and employment opportunities are both wider determinants of health. In addition, the policy should result in provision of open space, improvements to links to existing areas of open space, and should result in provision of allotments all of which will have health benefits. The policy should also help to create a balanced community, with school provision that will also help to meet wider local needs as well as other community facilities such as a doctors surgery, again having positive impacts on the health of existing and future communities.</p> <p>As this is a strategic development, a Health Impact Assessment will be required and this will assess the impacts on existing communities. This should also assess the impacts of the A27 on the future community, particularly in relation to noise levels from traffic on the A27 as well as airborne pollution, and it is noted that this is now a requirement of the policy. The SA notes that the recommendations from the HEQIA 2012 with regards to potential health impacts have been incorporated within the policy.</p> <p>On balance, the positive impacts of this policy are considered to outweigh the potential negative impacts in relation to air quality.</p>		+	+
14) Integrate health and community safety	The policy should bring about positive benefits against this objective. Improvements to road safety in the wider area is a priority for the area In addition, new development provides the opportunity to incorporate features that design out crime.		+	+
15) Narrow the gap between deprived areas and rest of the city	The site falls within the Hangleton & Knoll ward. Several LSOAs located within this ward suffer from varying levels of deprivation under most domains. Two of the ten LSOAs situated within Hangleton & Knoll fall within the 10% most deprived SOA in the country, and the 14 th and 15 th most deprived in the city (overall deprivation). The policy now requires developers to secure training for local people, which has the potential for reducing employment based deprivation. In addition, the requirement for the development to be phased ensuring that ancillary and community uses are provided alongside and not after the development, should have wider benefits for adjacent communities, through provision of additional services and reducing pressure on existing services. The provision of sustainable energy infrastructure, and low carbon energy solutions may also help to reduce energy bills for future occupants and address any potential for fuel-based poverty.		+	+
16) Engage local communities	It is likely that development in this location will incorporate widespread community consultation and engagement, which will commence prior to any development taking place.	+	+	+
17) Make the best of previously developed land	The policy will have an indirect negative impact on this objective, as involves development on a Greenfield site.		-	-
18) Maximise sustainable energy	Any increase in development will result in an increase in energy consumption. However, the SA recognises the requirements of the policy, in relation to creating an exemplar sustainable development will impact on the design of the development, and the policy requirements for		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	the development to be zero carbon and to consider heat networks for either current or future connection, should result in the impact being positive. This is also backed up by the requirement to meet government targets relating to providing zero carbon homes and employment uses by 2016 and 2019. In addition, the requirement to consider delivering energy infrastructure, such as district heating, may also have wider benefits for adjacent communities.			
19) Taking account of the changing climate	<p>Greenfield sites have an important role to play in helping the city adapt to climate change. They help to reduce the impact of heat island effect, as well as absorb water, and temperature and rainfall are both likely to increase as a result of climate change. Development of this site therefore may potentially contribute towards reducing the city's ability to adapt to climate change.</p> <p>In addition, new development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes of temperatures and weather conditions associated with climate change, although it is recognised that the supporting text requires development to adapt to climate change.</p> <p>It is recognised that all new development, including residential and other uses will be required to meet the requirements of CP8, which include contributing to minimising the urban heat island effect through tree-planting, which will help in adaptation to climate change. However, as this Greenfield sites have an important role to play in adapting to climate change, the SA considers that the policy should be strengthened by requiring this in policy.</p>		-	-
20) Meet BREEAM / Code for Sustainable Homes	The SA notes that the former SA recommendation for the policy to refer to the standards set out in CP8 for Greenfield sites, was implemented at draft plan stage (May 2012). The SA notes that the policy now also sets specific high requirements relating to BREEAM and CSH standards which should ensure the impact is positive against this objective. In addition, the requirement to create an exemplar sustainable development will ensure that high standards are met.		++	++
21) Increasing accessibility	The strategy for development is to provide a sustainable mixed use development that will meet the needs of its residents as well as those of adjacent communities. The policy should provide housing, employment opportunities, local amenities, including health and community facilities, as well as open space. The policy should also provide access links to the wider area, and support sustainable transport. The policy should therefore ensure that the wider communities needs can be met and the requirement for the development to be phased ensuring that ancillary and community uses are provided alongside and not after the development, should have wider benefits for adjacent communities, through provision of additional services and reducing pressure on existing services. However, as the site is situated away on the outskirts of the city, the impact is not found to be significantly positive.		+	+
22) Reduction of waste	The policy will lead to an increase in waste at both construction and operation stages. Development of the site is likely to create excavation waste, which will be encouraged to be recycled through application of Waste & Minerals Local Plan policies. CP8 should ensure		-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.			

Policy DA8: Shoreham Harbour

Due to the time taken to secure investment for this work, the SA considers it unlikely that there will be any impacts in the short term. For purposes of this SA, the SA assumes that all quantum of development are viable and will be delivered, and that the essential infrastructure including flood defences and transport network improvements needed to enable the delivery of the scheme will be in place.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Within the Brighton & Hove area, the Basin Road South SNCI and habitats and species associated with this may be sensitive to impacts potentially arising as a result of any scheme. The wider JAAP area is regionally important for passage birds, of county importance for wintering birds and locally important for breeding birds.</p> <p>No ecological study has been carried out to determine the impacts of this scheme, and would be recommended as part of a wider Environmental Impact Assessment, particularly of land reclamation from within the Canal area if required.</p> <p>Development may provide the opportunity to enhance biodiversity, however also presents a risk as outlined above and therefore a negative uncertain impact for the medium and long term is awarded.</p>		-?	-?
2) Improve air quality	<p>The development area falls within the AQMA that was designated in 2008. NO₂ levels have been modelled along certain roads in Brighton & Hove and the area that runs along the A259 carriageway between Church Road and Wharf Road exceeds the annual mean air quality objective for NO₂. Within this area, NO₂ levels at the Boundary Road/Station Road junction and the Wharf Road junction are likely to continue to exceed the annual mean limit value for NO₂ in future years. Pollution levels at the Wharf Road junction can be partly attributable to the volume of HGVs that use this junction to access Wharf Road, however the width of the carriageway and streetscape in this area are better for dispersion of vehicle emissions. Poor air quality is more of an issue for sensitive receptors at the Boundary Road/A259 junction and also for those situated alongside Church Road/Trafalgar Road where the carriageway is narrower and the streetscape creates a canyon effect.</p> <p>One of the priorities for Character Area 3: North Quayside/South Portslade is to develop a new access road to the South Quayside via the existing junction at Church Road/A259/Basin Road North and linking to the existing Basin Road North. This would also link to Basin Road South and would divert HGVs from the route currently used via the Wharf Road junction. This is likely to reduce the level of exceedence and improve the existing air quality around the Wharf Road/A259 junction. The SA recommends that monitoring of air quality at the three key junctions along the A259 in this area would help to ascertain the impact on air quality.</p> <p>The policy proposes certain amounts of development, including 400 residential units within</p>		-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>the Brighton & Hove area of the Harbour, and 7,500sqm of additional employment floorspace, some of which may be used by non-port employment uses and the overall aim of the policy is to enhance the operations of the Port. This additional amount of development in the area is likely to have some impacts on number of journeys made to the area and congestion, with potential for associated impacts on air quality either within the development area or on key roads within the surrounding area.</p> <p>It is presumed that the detailed JAAP policy will set out the aims in terms of sustainable transport, which may help to mitigate against this and the SA recommends that the detailed JAAP policy should seek to ensure that sensitive receptors are located away from the roadside and that any new streetscapes are designed to avoid the canyon effect.</p> <p>A negative score is awarded as although the changes to access to the port may bring about localised improvements in air quality, overall the impact is considered to be negative. The SA notes that the recommendation put forward at draft City Plan stage (May 2012) to include a reference to improving air quality for Character Area 3 – North Quayside/South Portslade has been included.</p>			
3) Maintain local distinctiveness	<p>Poorly designed or located development can have a negative impact on the historical built environment with the wider area containing a Scheduled Ancient Monument, listed buildings and is adjacent to conservation areas, all of which will need to be considered. Some of the existing townscape and public realm in the area is of poor quality and priorities for Character Areas 2 and 3 includes improving the local townscape which should lead to a positive impact on this objective.</p> <p>The policy proposes 400 residential units which will generate demand for open space. It is not known whether the full open space requirements of future residents could be met on site and this could increase the pressure on existing areas of open space situated within the western wards of Brighton & Hove, such as Vale Park, Victoria Park, Wish Park and Hove Lagoon which are all within close proximity to this part of the Development Area. The Area Priorities for character area 5 include the improvement of the quality and access of public areas, including the beaches, which are an important component of open space in this area and should also help to bring about positive impacts against this objective. The SA recommends that reference to protection of the historic built environment and provision of open space should be made, although recognises that this may be more appropriately located in the more detailed JAAP policy.</p>		+	+
4) Protect South Downs	<p>The Shoreham Harbour and Boundary Road area were both identified as areas with potential for tall buildings in the Tall Building Study (2003). Although the location of tall buildings in this location is unlikely to impact on views of the Downs, they may impact on views from the Downs, which are an important part of the National Park designation. It is unknown what</p>		?	?

SA Objective	Summary of effects	Short term	Medium term	Long term
	height buildings may be in the area, however the AECOM Shoreham Harbour Capacity and Viability Study (2011) indicates that buildings may be up to 6 storeys in height. The SA does not consider that buildings of this height would significantly impact on views from the Downs, however the SA recommends that the impact should be tested at application stage and considers the impacts to be uncertain.			
5) Provide decent, affordable housing	The policy specifies delivery of 400 residential units in the Brighton & Hove part of the Development Area. The area is a broad location for housing, however the Area Priorities for Character Areas 2 (Aldrington Basin) and 3 (North Quayside/South Portslade) include residential/mixed use development in these areas, although there is no indication as to how this will be delivered and it is expected that this will be considered further by the JAAP. The impact is likely to be positive on this objective, with this becoming more significant in the long term.		+	++
6) Reduce amount of car journeys	<p>There are strong east-west links throughout the area provided by the existing railway and road network, although the road network suffers from congestion. Links north-south are more constrained. Previous transport assessments have shown that there is limited capacity for the existing road network to absorb additional journeys in the area. Vehicular access to the port is heavily constrained as is restricted to a single access point. The Harbour area is a popular route for cyclists with National Cycle Route 2 passing through the Harbour, making use of the locks and is also used for pedestrian access. The SA welcomes the priority for Character Area 5 in relation to improving the PROW and the priority for Character Area 1 for improving specific roads for cycling and walking.</p> <p>The policy proposes certain amounts of development, including 400 residential units within the Brighton & Hove area of the Harbour, as well as 7,500sqm of additional employment floorspace. This additional amount of development in the area is likely to have some traffic impacts, either as a result of the newly located residents, from people travelling to the Harbour for work, or from increased vehicles related to a potential increase in port activity and therefore a negative score is awarded.</p> <p>The priority for the North Quayside/ South Portslade area to develop a new access road may help improve access to the port and improve congestion around the Kingsway/Wharf Road junction, as well as reduce volume of heavy good vehicles between this junction and the Church Road/Kingsway junction, although this would benefit from transport modelling to ascertain impacts.</p>		-	-
7) Minimise risk of pollution to water	The SFRA 2012 shows that some areas within the site are at risk of surface water flooding in both the 1 in 30 and 1 in 200 year event. This would need to be considered when planning development. Surface water flooding can result in pollution to water resulting in a negative score against this objective. The area is also within the EA's major aquifer high vulnerability zone and consequently could be susceptible to groundwater emergence. However the SA recognises that the policy requirement to accommodate future capacity requirements relating to waste water treatment will have positive impacts on this objective. Overall the impact is		-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	therefore considered to be mixed.			
8) Minimise use of water	The South East has undergone periods of high water stress therefore measures to reduce water consumption are critical. New development of any type will increase demand for water, and therefore must be minimised through incorporation of highly efficient water saving technologies.		-	-
9) Promote development of contaminated land	The Harbour area has been subject to many phases of industry including the former Portslade Gas Works, Timber Yards, Power Stations and Coal House. These former land uses, as well as existing land uses have the potential to have caused contamination. Any development within the area has potential to remediate previously contaminated land, and therefore is likely to have a positive impact on this objective. The SA recommends that more specific wording in relation to promoting remediation of contaminated land could be contained within the detailed JAAP policy.		+	+
10) Manage coastal defences and minimise coastal erosion and coastal flooding.	The SFRA 2012 identifies that 26% of the development area is situated within flood zones 3a and 3b. In addition, the SFRA considers wave over-topping to be a significant risk in this area, and this has not been considered in the designation of the flood-zones, potentially meaning that a greater extent of the area could be at higher risk. The SFRA also found the area to be at increased risk of flooding due to climate change. The SA notes that parts of the development area are situated within flood zones 3a and 3b and therefore development situated within these areas are at high risk of flooding. The impact on this objective is therefore considered to be negative. All development proposals should carry out a site specific flood risk assessment and any development proposals for more vulnerable uses would need to pass the sequential and exception tests. The SA notes that the recommendation put forward in the previous SA of the draft City Plan (May 2012) regarding flood risk has been included.		--	--
11) Employment: balance needs of tourists, residents and businesses	Some of the LSOA located within South Portslade fall within the most 20% deprived in the UK in terms of education and skills, and also suffer from employment deprivation (IMD 2010) and the policy makes specific reference to the worsening pockets of deprivation. The policy states that 7,500sqm of additional employment floorspace will be located within the Development Area. This could be floorspace that is associated with the port-based industries, or other types of employment uses, including office space, restaurants, cafes, leisure and tourism related uses, all of which will provide employment opportunities. In addition, employment opportunities will be provide at construction stage. One of the main aims of the policy is for the Harbour to benefit existing and future communities, and it is presumed that this includes through the provision of employment opportunities and it is recommended that the JAAP policy specifies that employment opportunities will be provided for local people, particularly at construction stage.		+	++
12) Support economic development	One of the main aims for Shoreham Harbour is to maximise its potential for business and Port-users, and to enhance the operations of the Port recognising the vital role it plays in the		+	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>local economy. The delivery of mixed-use developments including employment space is also one of the aims for the area. The policy should have a positive impact on this objective through the delivery of new and improved port operational facilities, which should increase the operational use and output of the Port, through improvements to the business environment of existing non-port employers, through provision of 7500sqm additional employment floorspace (to be delivered within Brighton & Hove) for a range of uses and through the redevelopment of currently under-used spaces. In addition, the safeguarding of the wharves for minerals will also have positive impacts on economic development, with the Port being of regional importance for the landing and handling of minerals. The benefits to the local economy are likely to become more significant in the long term. The designation of the South Portslade Industrial Area as a Strategic Employment Area, potentially incorporating residential development could bring about the redevelopment of the lower-grade employment areas potentially having economic benefits and is not considered to have a negative impact on this objective. The mix of residential and employment uses in the Port may also bring about economic benefits to the nearby local centres, including the Boundary Road/Station Road District Centre.</p>			
13) Improve health	<p>Health based deprivation (measured by the IMD2010) varies widely within the South Portslade ward, ranging from being within the most 6.6% deprived LSOAs in the UK, to within the 47.1% most deprived LSOAs. The regeneration of the Harbour area to include provision of housing, employment opportunities, improved quality and access to existing open space and to other local connections and leisure opportunities should help to bring about a positive impacts, with all being wider determinants of health. However, air quality is currently an issue in this area, and air quality may worsen as a result of the traffic impacts of development, potentially bringing about negative impacts on health, and this is reflected in the mixed -/+ score. This will be dependant on where and how sensitive development is situated and could be mitigated through careful design within the Development Area, however may impact on adjacent areas that already suffer from poor air quality and that do not have the capacity to change. See ob 2.</p>		-/+	-/+
14) Integrate health and community safety	<p>There is no specific objective regarding community safety, however improvements to sustainable transport, improvements to the streetscape and public realm, and improvements to key gateway routes all have potential to bring about positive impacts.</p>		+	+
15) Narrow the gap between deprived areas and rest of the city	<p>Two of the LSOAs within the South Portslade ward are within the most 20% deprived LSOAs in the UK (overall deprivation IMD 2010) and deprivation varies widely within the ward itself. Domains where LSOA within the South Portslade ward are in the 20% most deprived in the UK include income deprivation affecting older people, health, education & skills, children & young people, housing, and living environment. Employment (at 20.1%) is also an issue in some LSOAs. Two of the LSOA in the Wish ward are situated along the eastern edge of the Development Area, with these LSOA having most significant levels of deprivation in the wider barriers and living environment domains. Regeneration of the harbour area has</p>		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	potential to reduce deprivation among some of these domains as has potential to bring about benefits to the existing local community, provided that the needs of the existing local community are met. The SA recognises that the main aims includes bringing benefits for existing as well as future residents, as well as the fact that development plans for the harbour area are driven by worsening pockets of deprivation.			
16) Engage local communities	All LDF documents include periods of public consultation. The JAAP and accompanying SA will be subject to widespread consultation.		+	+
17) Make the best of previously developed land	The entire development area is situated on previously developed land. Some of the development area includes under-used and vacant employment sites, the value of which could be improved. It is assumed that new development, and consolidation of existing development will make better use of this land.		+	++
18) Sustainable energy	In general, an increase in development is likely to lead to an increase in energy consumption. The policy itself does not set standards, in terms of BREEAM or similar, however it is assumed that the standards set out in CP8 will apply or may be detailed further in the JAAP. The policy encourages developers to consider heat network systems for current or future development, and this should also help to bring about positive impacts. In addition, government targets for all new homes to be zero carbon by 2016 and non-residential development to be zero carbon by 2019 should also help to ensure high standards in terms of energy efficiency are met and therefore overall, the policy should bring about positive benefits against this objective. Widespread re-development of existing buildings in the area also provides the opportunity to increase their energy efficiency and should be encouraged.		+	+
19) Taking account of the changing climate	The potential impacts of climate change include an increase in extreme weather events, e.g. droughts, storms and heavy rainfall, as well as predicted rises in sea level which will increase the likelihood of tidal flooding. The SFRA 2012 outlines areas which will be at risk of tidal flooding as a result of the effects of climate change and this includes areas situated within the JAAP boundary, with risks of flooding increasing with climate change. Development in this area is therefore considered to be at greater risk of the impacts of climate change, particularly coastal flooding with climate change reducing the effectiveness of the existing sea defences over time.		-	--
20) Meet BREEAM / Code for Sustainable Homes	There is no specific requirement in the policy for development to meet certain standards, however it is assumed that this will be set out in the JAAP.		-	-
21) Increasing accessibility	One of the priorities for Character Area 2 is to improve access arrangements to create better links to surrounding areas; one of the priorities for Character Area 3 is to improve connections to Boundary Road/Station Road and Church Road areas; and in addition, the priority for Character Area 5 is to improve access to the PROW corridor, beach and public areas. The policy is therefore considered to have a positive impact on this objective as should improve and increase accessibility.		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
22) Reduction of waste	In general, an increase in development will lead to an increase in production of waste both at construction and operation stages.		-	-

Policy SA1: The Seafront

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The policy includes development such as the King Alfred Site, the i360 Tower, proposals at Black Rock and Brighton Marina and the International Conference Centre, and therefore there is the possibility that an indirect negative impact on existing biodiversity could occur, which is of particular concern at designated sites.</p> <p>However, there are many aspects to the policy that will ensure the protection of existing biodiversity and have a directly positive impact on this objective. The policy recognises and makes reference to the importance of the natural assets found along the seafront, which have biodiversity and geological value and the need to protect them. The policy also makes specific reference to tree planting along the western seafront. The policy states that any proposal for regeneration/development should enhance biodiversity.</p> <p>A mixed -/+ score has been awarded to reflect the aspirations of the policy but also the risks. CP8 and CP10 should also help to address this risk.</p>	-/+	-/+	-/+
2) Improve air quality	<p>Direct impact. In general, despite the high volumes of traffic that use the seafront road, air quality along this route is generally better than less busy routes, due to the streetscape which aid dispersal. Although improving sustainable transport infrastructure along the seafront in order to achieve a modal shift is a priority for the whole seafront, as well as specific sections/junctions where air quality is poor, or where the NCR2 is below national standards is likely to result in an improvement in local air quality, the policy is also concerned with some significant developments, including 400 residential units at the King Alfred site as well as leisure facilities for the wider area, and this may worsen air quality in this area through potentially increased traffic movements. It is noted that NO2 levels at the Hove Street/Kingsway junction have been modelled and are shown to currently exceed the annual air quality objective. The short term impacts are considered to be positive as development is likely to come forward in the later stages of the plan period.</p>	+	-/+	-/+
3) Maintain local distinctiveness	<p>The policy recognises the value of historic buildings located along the seafront and makes specific reference to the Conservation Areas, historic squares and lawns that adjoin the seafront. Policy likely to have a direct positive impact on maintaining the distinctiveness of these areas, with specific reference to improving the public realm, as well as ensuring that new developments are consistent with the existing scale and roofline along certain parts of the seafront and that they respect the adjoining context. The King Alfred Strategic Allocation makes specific reference to preserving and where possible enhances the settings of the three adjacent Conservation Areas and Listed Buildings, as well as enhancing strategic views, all of which will have positive impacts on this objective.</p> <p>The policy also recognises the value of the seafront in terms of provision of open space, with it contributing to the city's network of open space, as described in Open Space, Sports and Recreation Study 2009, and the variety of opportunities it provides.</p>	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
4) Protect South Downs	Direct impact. The South Downs National Park extends down to the mean low water point in the area "East of the Marina". The policy now contains a requirement that there should be no adverse impacts on the setting of the National Park, which should help to bring about positive outcomes for this objective.	+	+	+
5) Provide decent, affordable housing	Direct impact. The King Alfred Strategic Allocation includes 400 residential units, which it is understood are essential to the viability of the scheme. This is unlikely to be brought forward until the later stages of the plan period.			++
6) Reduce amount of car journeys	Major developments proposed for the seafront may cause an increase in road traffic unless they have appropriate and sufficient methods of sustainable transport to reach them. In addition, 400 residential units proposed for the King Alfred site may dramatically increase car ownership and movements in this area. However, the SA notes that one of the priorities for the whole seafront is improving sustainable transport infrastructure in order to achieve a modal shift and has numerous other references to improving pedestrian and cycling routes, with particular reference to improving NCR2 around the Western Seafront, as well as public transport. The short term impacts are considered to be positive as development is likely to come forward in the later stages of the plan period. The measures outlined in the policy, in collaboration with CP9 should ensure that the car journeys associated with development along the seafront are reduced.	+	-/+	-/+
7) Minimise risk of pollution to water	Direct positive impact on this objective as the policy will seek to minimise the risk of flooding and will actively work in partnership with agencies to ensure protection of the coastline. Development at the King Alfred site is not considered to increase the risk of surface water flooding elsewhere, nor is it in a location of surface water flood risk. In addition, the supporting text sets out a presumption against an increase in hard-surfacing, which acts positively in reducing the risk of surface water flood risk. The policy will help to meet requirements of the Water Framework Directive.	+	+	+
8) Minimise use of water	Indirect impact. Any new development will increase demand for water, and therefore consumption must be minimised through incorporation of highly efficient water-saving technologies. CP8 should ensure that water consumption is minimised.	-	-	-
9) Promote development of contaminated land	Some of the named sites may be contaminated. Redevelopment of the named sites may require investigation of contaminated and would result in remediation where necessary however this is unknown at this stage.	?	?	?
10) Manage coastal defences	Direct positive impact. The policy recognises the fact that the coastal frontage is considered to be at risk from tidal flooding and states that the risk of flooding will be managed through work with various agencies to maintain coastal defences. Guidance outlined in CP11 will ensure that risk of coastal flooding is minimised and that only appropriate uses/developments are sited along the seafront location. It is recognised that the King Alfred Strategic Allocation is located in a seafront location, however this is behind the existing flood defences and the SFRA 2012 does not show this site to be at present or	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	future tidal flood risk, although there may be risk of wave over-topping. The policy specifically states that appropriate flood protection must be provided for.			
11) Employment: balance needs of tourists, residents and businesses	Direct positive impact. Ongoing regeneration of the seafront is likely to lead to increased opportunities for employment, through an associated increase in use by residents and tourists with a number of major developments proposed for the seafront.	+	+	+
12) Support economic development	As with objective 11. In addition, replacement of facilities at the King Alfred site could increase footfall throughout this area having wider benefits, as well as supporting employment and economic development through construction.	+	+	+
13) Improve health	Overall the policy is likely to have a direct positive impact on health. The policy recognises the significance of the seafront for recreational and leisure purposes. Protection and further enhancement of the seafront is likely to have a positive impact on health, through access to open space and the associated health impacts this can have. In addition, text in the policy specifically relates to ensuring individuals needs are met (through toilets, seating, shade etc), which will increase and improve the seafront as a leisure/recreation facility. Replacement of existing sports facilities at the King Alfred site will also have positive implications for health, and development in this location will incorporate a site based health impact assessment to ensure health impacts associated with re-development are minimised and mitigated for.	+	++	++
14) Integrate health and community safety	Direct positive impact. Health and road safety should be improved through improvements to crossing facilities for pedestrians and cyclists. In addition, lighting should improve community safety along the seafront after dark.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	The policy seeks to provide a "seafront for all", continuing to meet the needs of all communities. In addition, the policy now requires training places to be provided for local people in relation to the strategic allocation, which may help to improve education and employment prospects.	+	+	+
16) Engage local communities	There is no direct link with this objective			
17) Make the best of previously developed land	Direct positive impact. Some of the areas proposed for development are on areas of previously developed land, including the King Alfred Strategic Allocation.	+	+	+
18) Sustainable energy	New development presents the risk of increasing energy consumption. However, the policy makes specific reference to encouraging opportunities to consider small scale renewable energy provision, and also requires developments to consider heat network systems either for the current development or for future developments, and therefore the impact is considered to be positive. In addition, government targets should ensure zero carbon status is achieved for new development by 2016/2019.	+	+	+
19) Taking account of the changing climate	The policy recognises that the changing climate may have an impact on the cliffs and states that work to monitor and manage the coastline, in collaboration with other agencies will occur. In addition, opportunities to provide shade through planting will help adapt to climate change in the future.	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
20) Meet BREEAM / Code for Sustainable Homes	Indirect negative impact. New development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various BREEAM standards.	-	-	-
21) Increasing accessibility	Direct positive impact. The policy specifically refers to ensuring the seafront is accessible to all. Facilities such as toilets, shade and seating all help to increase accessibility to services. In addition, replacement of indoor and outdoor sports facilities will help to ensure continued access to these facilities.	+	+	+
22) Reduction of waste	Indirect negative impact. Construction and demolition waste likely to be associated with re-development of the King Alfred, and other key sites, in addition to increased waste at operation stage. Production of waste by visitors to the seafront is an existing issue which will continue to worsen if visitor numbers increase. Waste production is significantly higher in the summer-time, however it is recognised that the City Plan has limited ability to influence waste disposal by commercial businesses, and that this should be a wider awareness initiative. The SA notes that the policy now includes a reference to waste facilities on the seafront, which was recommended that by the SA at the previous stage of assessment.	-	-	-

Policy SA2: Central Brighton

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. The policy is unlikely to have a negative impact on this objective, due to the area that the policy relates to, and there is potential for new development to incorporate features to enhance biodiversity, although this is not stated within the policy and therefore remains uncertain. However should be met through CP8 and CP10.	+?	+?	+?
2) Improve air quality	Direct impact. Priority 7 refers to improving the urban realm, reducing congestion and improving air quality. In addition, policy will seek to focus any new significant retail development and protect existing office accommodation in the central Brighton area, which is well served by existing public transport links and therefore could reduce the need to travel by car. However, it is noted that the annual mean levels of NO2 measured at monitoring locations within the SA2 area continue to be some of the highest measured in the city (2011 monitoring results) and that this area is closed to private motor vehicles. The SA recognises the positive aspects of this policy that would help to improve air quality such as an improved urban realm, however any new development located within central Brighton could result in increased traffic, either within the locality or the surrounding area, with associated air quality impacts.	-/+	-/+	-/+
3) Maintain local distinctiveness	Direct impact. Policy seeks to protect historic buildings and recognises the distinct but interconnecting roles of the different areas that comprise the central Brighton area. In addition, policy point 3c will now allow a change of use from B1a office if it means that it will lead to protection of a listed building, having further positive impacts against this objective.	++	++	++
4) Protect South Downs	There is no link with this objective.			
5) Provide decent, affordable housing	Direct impact. The policy's main concern is to reinforce central Brighton's role as a centre for retail, tourism, cultural activities and commerce. However the amendment to policy point 5, which strengthens and shows support for housing above other uses such as retail, should have a positive impact on this objective.	+	+	+
6) Reduce amount of car journeys	Direct impact. Urban realm improvements could encourage pedestrian and cyclist movement within the city. Protection of office accommodation in central Brighton, whereby there is already good access to various modes of public transport, may also reduce the need to travel by car (compared with a situation, for example, where office accommodation was located outside the central area). However, it is recognised that for retail purposes, the central Brighton area is the main area that visitors wish to visit, and that the any further increase in retail floorspace could cause an increase in the numbers of journeys made to the city centre unless measures to promote sustainable travel, or travel by alternative means is encouraged. The cross-cutting policy on sustainable transport should ensure that a modal shift is achieved across the city with various measures to improve and encourage sustainable travel.	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
7) Minimise risk of pollution to water	Indirect impact. Any further development has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution. Groundwater resources must be protected under the requirements of the Water Framework Directive. Based on the results of the SFRA 2012, there are some areas within the Central Brighton area that are at risk of surface water flooding in a 1 in 30 year event. Areas that are at risk are predominantly located to the east of the area, around Gloucester Place, Marlborough Place, Old Steine and Pavilion. The extent increases and there are more areas that may be at risk from a 1 in 200 year event, including North Street and the SFRA recommends that a site based flood risk assessment would be required to look at all sources of flood risk and to ensure flood risk is not increased elsewhere. CP8 and CP11 should ensure that appropriate systems in place to reduce risk of surface water flooding.	-	-	-
8) Minimise use of water	Indirect impact. The policy is more concerned with protection of existing buildings and uses, however does also promote new development. Any new development will increase demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. The policy encourages refurbishment of existing property which could include measures to reduce water consumption. CP8 should ensure that water consumption is minimised.	-	-	-
9) Promote development of contaminated land	There is no link to this objective.			
10) Manage coastal defences	There is no link to this objective. According to the SFRA 2012, the Central Brighton area is not at risk of tidal flood risk.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. The main objective of the policy is to reinforce the city's role as a regional centre and therefore seeks to support and maintain economic activity, through retail, cultural activities and tourism. In addition, the policy seeks to protect B1a office accommodation located in the Central Brighton area, although sets clear criteria for when loss will be permitted. The policy is therefore likely to support opportunities for employment in various sectors, benefiting both residents and visitors alike and specifically recognises the role and needs of small independent local traders and creative industries.	++	++	++
12) Support economic development	Direct impact. As objective 11 above. The policy point that seeks to protect existing office accommodation in central Brighton is also considered to have a positive impact on this objective, as should enable the provision of office space to meet local commercial needs. The policy allows change of use from B1a office accommodation through application of clear criteria, if required, allowing for future flexibility. In addition, the policy specifically refers to meeting the needs of the creative industries sector in terms of provision of workspace, thus supporting their role in the local economy.	++	++	++
13) Improve health	Indirect impact. There may be some positive impacts on health through improvements for pedestrians and cyclists resulting from the improvements to urban realm. However, as	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	discussed under objectives 2 and 6, congestion and air quality could worsen as a result of additional development, particularly any significant new retail development, which will have implications for health.			
14) Integrate health and community safety	Direct impact. The supporting text recognises that central Brighton, and particularly the West Street area has been identified as a violent crime hotspot. The policy seeks to improve evening/night-time community safety through the encouragement of range of evening economy users and age and social groups. This should help to improve community safety. In addition, support for residential above retail/other employment uses may help to increase natural surveillance.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	There is no link with this objective.			
16) Engage local communities	There is no link with this objective.			
17) Make the best of previously developed land	There is no direct link with this objective.			
18) Sustainable energy	Direct impact. The policy is more concerned with protection of existing buildings and uses, however does also promote new development. Any new development will increase demand for energy, and therefore must be minimised through incorporation of energy efficient design and technology. Due to the findings of the Energy Study, the central Brighton area has been found to demonstrate viability for a district heating network and the policy now expects development in this area to incorporate infrastructure to support heat networks, subject to viability. This is considered to bring about positive measures in the short and medium term, becoming more significant in the long term. The policy encourages refurbishment of existing property which could include measures to reduce energy consumption. In addition, government targets should ensure new non-residential development achieve zero carbon status by 2019.	+	+	++
19) Taking account of the changing climate	Indirect impact. New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. Area not considered to be at risk to tidal flooding resulting from climate change. CP8 requires all development to be able to respond to changing needs.	-	-	-
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various BREEAM standards.	-	-	-
21) Increasing accessibility	Direct impact. Central Brighton is accessible by various modes of transport. Further improvements to urban realm should assist in increasing accessibility to the area.	+	+	+
22) Reduction of waste	Indirect impact. This area contains a high number of retail units, restaurants, cafes, clubs, theatres, as well as a number of commercial premises etc, all of which are likely to produce	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	high volumes of waste. Any new development in this area is likely to lead to an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.			

Policy SA3: Valley Gardens

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct positive impact. Policy likely to improve and enhance biodiversity with specific references to tree planting and creation of new public park and more usable open space.	+	+	++
2) Improve air quality	Direct positive impact. The policy specifies that local air quality will be improved, with the policy directly seeking to reduce the adverse and severance impact of vehicular traffic through transport improvements. Improved connectivity for neighbouring communities, improvements to public realm, improved linkages between other areas and improved crossing points for pedestrians and cyclists may also result in a reduction in movement by car, which would have an associated positive impact on air quality.	+	++	++
3) Maintain local distinctiveness	Valley Gardens is the central spine of historic Brighton and is a junction for the three major traffic routes into the town. It includes some of the earliest buildings from Brighton's fashionable Regency development phase as well as many of the town's most important listed buildings and open spaces, and extends out to the sea via the Palace Pier. Its status as a conservation area lies in the historic interest behind its development as well as the architectural interest of its buildings. The Conservation Area has been designated as "at risk" in a recent study by English Heritage. The policy should have a direct positive impact on this objective. Key aims of the policy include the enhancement of historic buildings, the creation of attractive and usable open/green spaces and to find new uses for key buildings, all of which would have a positive impact on this objective and may lead to improvements in the "at risk" status. The cultural and heritage significance of the area and the importance of the area in provision of open space are recognised in the policy.	+	++	++
4) Protect South Downs	There is no direct link to this objective.			
5) Provide decent, affordable housing	There is no direct link to this objective.			
6) Reduce amount of car journeys	As with objective 2, the policy is likely to have an overall positive impact on this objective with overall aim to reduce the adverse impact of vehicular traffic and should deliver transport improvements.	+	++	++
7) Minimise risk of pollution to water	Indirect positive impact. The policy does include opportunities for redevelopment of existing buildings or sites, however does not include proposals to develop land that is not currently urbanised. Therefore, it is unlikely that the risk of surface water flooding will be increased. In addition, maintaining the gardens as open space will help to minimise the risk of surface water flooding through enabling natural absorption of water.	+	+	+
8) Minimise use of water	Indirect negative impact as the proposals for re-development could cause an increase in water consumption. Water minimisation technologies must be incorporated into new or redevelopments in accordance with CP8.	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
9) Promote development of contaminated land	There is no link with this objective.			
10) Manage coastal defences	There is no link with this objective.			
11) Employment: balance needs of tourists, residents and businesses	Redevelopment of the existing buildings likely to provide employment opportunities, and overall improvement to the area likely to meet the needs of residents and visitors alike. Improvements to this area, including links between this and other areas likely to have a positive impact on the retail centres on the periphery (e.g. London Road and Lewes Road).	+	+	+
12) Support economic development	As objective 11.	+	+	+
13) Improve health	Direct positive impact. Improved links and connections would be of benefit to communities bordering the Valley Gardens area, through increased access to and from the area, and adjoining areas, as well as through encouragement of physical activity. Access to open space and biodiversity both have documented benefits to physical and mental health. Any reductions in traffic would lead to improvements in air quality and a reduction in road-related noise, both of which would have a positive impact on health.	+	++	++
14) Integrate health and community safety	Direct positive impact. One of the overall priorities is to provide safe and legible links to surrounding areas. In addition, anti-social behaviour recognised as a problem in certain parts of the area, particularly the Level and landscaping schemes should help to improve community safety.	+	++	++
15) Narrow the gap between deprived areas and rest of the city	Indirect positive impact. The Valley Gardens area adjoins the Hanover and Elm Grove neighbourhood of the city. This area includes some areas of significant socio-economic disadvantage including the Tarnar area. Improvements to the area would be of some benefit to residents in these neighbourhoods, particularly the creation of safe and legible links with adjoining areas, but also as quality of open space improves. The potential to use some of the space for food production may increase access to food.	+	+	+
16) Engage local communities	Direct positive impact through policy commitment for the council to work with partners and the local community.	++	++	++
17) Make the best of previously developed land	The policy includes redevelopment of areas of PDL therefore likely to have a positive impact on this objective.	+	+	+
18) Sustainable energy	The proposals for development could result in an increase in energy consumption. However the new policy requirement encouraging development to consider heat network systems is considered to bring about positive impacts on this objective. In addition, in the medium to long term, government targets should also ensure that zero carbon status is achieved, in addition to the requirements of CP8.	+	+	+
19) Taking account of the changing climate	Indirect negative impact as new development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. However, retention of areas of open space will help adaptation to climate change in the long term.	-	-	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	CP8 requires all development to be able to respond to changing needs.			
20) Meet BREEAM / Code for Sustainable Homes	Indirect negative impact as new development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various BREEAM or Code for Sustainable Homes standards.	-	-	-
21) Increasing accessibility	The policy would have a direct positive impact on this objective through the priority to create safe and legible links with adjoining areas, through improved crossing points, improved public realm, and through the reduced severance impact of traffic.	++	++	++
22) Reduction of waste	Indirect negative impact. Any new development in this area is likely to lead to an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy SA4: Urban Fringe

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impact. One of the main objectives of the policy is promotion of urban fringe as part of the green network and encouragement of uses including biodiversity conservation, which should be result in positive impacts towards this objective. Although the policy recognises that a countryside location is sometimes justified for development, in these cases the policy seeks to ensure that development must minimise all adverse impacts, which will include impacts on biodiversity, and that the development will help to meet the objectives of the policy. Therefore although development in this location creates a risk of adverse impacts, on balance the policy is considered to have positive impacts against this objective.	+	+	+
2) Improve air quality	Direct impact. One of the main objectives of this policy is to promote access to the countryside through sustainable means. The policy no longer contains any references to management of access to the city, e.g. park and ride and it is understood that gateway facilities are not intended to be park and ride sites. The impact on air quality is considered to be positive.	+	+	+
3) Maintain local distinctiveness	Direct impact. The urban fringe is an important part of open space that maintains the character of the city setting. Some of the urban fringe also makes up the city's open space provision. One of the main objectives of the policy is to protect the landscape role of the urban fringe and therefore will help to protect the setting of the city. Although the policy recognises that a countryside location is sometimes justified for development, in these cases the policy seeks to ensure that development must minimise all adverse impacts, which will include landscape impacts, and that the development will help to meet the objectives of the policy. Therefore although development in this location creates a risk of adverse impacts, on balance the policy is considered to have positive impacts against this objective.	+	+	+
4) Protect South Downs	Direct impact. The urban fringe lies between the South Downs National Park boundary and the built up area of the city. One of the main policy objectives is to ensure the protection of the setting of the SDNP, including strategic views in and out of the city. Although the policy recognises that a countryside location for development is sometimes justified, in these cases development must have regard to the downland landscape setting of the city and minimise adverse impacts, including landscape impacts, and that development must help to meet the objectives of the policy. Therefore although development in this location creates a risk of adverse impacts, on balance the policy is considered to have significant positive impacts against this objective.	++	++	++
5) Provide decent, affordable housing	There is no link to this objective.			
6) Reduce amount of car journeys	Direct impact. One of the main objectives of this policy is to promote access to the countryside through sustainable means. The policy no longer contains any references to	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	management of access to the city, e.g. park and ride, and therefore the impact on reducing car journeys is considered to be positive.			
7) Minimise risk of pollution to water	Direct impact. One of the policy's key objectives is to protect groundwater from pollution, through land management practices that reduce surface water runoff. In addition, land on the urban fringe has a natural role in absorption of water, protecting against surface water runoff elsewhere. The policy should therefore have a significant positive impact on this objective.	++	++	++
8) Minimise use of water	There is no link with this objective.			
9) Promote development of contaminated land	There is no link with this objective.			
10) Manage coastal defences	There is no link with this objective.			
11) Employment: balance needs of tourists, residents and businesses	The downland area surrounding the city is an attraction to visitors and residents. Protection of the urban fringe and wider countryside will ensure that these needs continue to be met. In addition, one of the main objectives of the policy is to create gateway facilities in connection with the SDNP to support sustainable tourism, further supporting tourism-based employment opportunities.	+	+	+
12) Support economic development	As above.	+	+	+
13) Improve health	Direct impact. The policy is likely to have a positive impact on this objective. Access to open space and wider countryside provides greater opportunities for activity which is good for physical and mental health. In addition, well-being will be maintained for those who can see green space from their homes. The policy also supports the potential use of the urban fringe for food growing purposes (e.g. allotments) which would help to improve access to fresh food.	+	+	+
14) Integrate health and community safety	There is no link with this objective.			
15) Narrow the gap between deprived areas and rest of the city	There is no link with this objective.			
16) Engage local communities	There is no link with this objective.			
17) Make the best of previously developed land	Indirect impact. As the policy seeks to protect the urban fringe, which is predominantly managed open space or agricultural land (both defined as Greenfield) it therefore will direct development to land within the built-up area boundary, and previously developed land, however recognising that development can sometimes be justified in a countryside location. Therefore a positive impact is awarded	+	+	+
18) Sustainable energy	Indirect impact. The policy could have a positive impact on this objective, although is uncertain, with the supporting text suggesting that the urban fringe could have potential for locating infrastructure for renewable energy generation.	+?	+?	+?

SA Objective	Summary of effects	Short term	Medium term	Long term
19) Taking account of the changing climate	Indirect impact. The urban fringe plays an important role in the absorption of water, which may increase as a result of climate change. The policy therefore should have a positive impact, on enabling adaptation to climate change through protection of natural landscape form.	+	+	+
20) Meet BREEAM / Code for Sustainable Homes	There is no link to this objective.			
21) Increasing accessibility	Direct impact. The policy could help to increase accessibility to the countryside, with provision of safe public access by sustainable means one of the main priorities of the policy.	+	+	+
22) Reduction of waste	There is no link to this objective.			

SA5 – The South Downs

No requirement for further assessment at this stage

SA6 – Sustainable Neighbourhoods

No requirement for further assessment at this stage

Policy CP1: Housing Delivery

Policy CP1 sets the target to deliver 11,300 new homes. This amount is considered to be reflective of Option 2 – delivery of 11,200 new homes - that was assessed against the alternative options 1) 9,800 new homes; 3) 13,500 new homes; and 4) 15,800 new homes put forward in the Housing Delivery Policy Options Paper, October 2011. The four options for housing delivery were assessed by the SA at Policy Options Paper stage and found Option 2 to be the preferred option.

This policy is linked to the Development Area policies, as it sets out the quantum of housing that are anticipated to be delivered in each Development Area. To avoid duplication, this Sustainability Appraisal only covers the broad impacts of development, and in most instances does not go into site specific details as this will be covered in more detail within the individual Development Area policy assessments.

The SA makes the assumption that housing will be delivered at the level outlined in the policy.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>The policy will result in housing development throughout the city, some of which will be at high density and some of which will be on Greenfield sites. Housing development anywhere in the city has potential to harm biodiversity existing on site and will be dependant on the actual site developed. However development also provides the potential to enhance biodiversity through incorporation of biodiversity features, although as a general principle, the denser the housing development the less opportunities there are for incorporating biodiversity into the design.</p> <p>It is likely that housing development located on Previously Developed Land could mitigate any negative impacts through incorporation of features to attract biodiversity, such as green roofs or green walls or through site specific design, e.g. avoidance of shading.</p> <p>Housing at DA7 Toads Hole Valley, which is a Greenfield site has potential to have adverse impacts on biodiversity, the significance of which can only be determined once an assessment of the ecological value of the site has taken place.</p> <p>The impact is considered to be more significant in the long term due to cumulative effects. CP8 and CP10 should ensure effect of housing is positive and enhances biodiversity.</p>	-	-	--
2) Improve air quality	<p>The policy seeks to encourage new development within accessible areas of the city. Housing development within the built up area of the city benefits from existing public transport links and options, which may influence decisions on car ownership/journey choice. However, overall, delivery of 11,300 new homes in the city is likely to have a negative impact on this</p>	-	-	--

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>objective with this becoming more significant in the long term. Much of the city is already designated as an AQMA and location of housing within the built up area may exacerbate existing air quality issues or increase the number of people exposed to poor air quality. The Toads Hole Valley site is currently well served by the existing road network however not well served by public transport and this could impact on choices made regarding car ownership/journey mode.</p> <p>The Development Area policies and CP9 Sustainable Transport should ensure that development is situated within areas of good transport links, and ensure that development schemes respond to the demand for travel that they create.</p>			
3) Maintain local distinctiveness and sites	<p>Housing development has the potential to have a negative impact on the surrounding areas if poor quality design is permitted. However, CP12 should ensure the effect is positive and that development achieves high standards of urban design. It is assumed that tall buildings will only be built in areas that have been assessed as having potential to accommodate tall buildings and therefore won't have an adverse impact on any local sites or the character of neighbourhoods. In terms of impact on the built environment, the policy has a degree of uncertainty as will depend on the site developed.</p> <p>Housing development has the potential to have a negative impact on open space, if there is an increase in pressure on existing open space due to an increase in local population. There is concern that there may be conflict over land use or that the open space requirements of the future population will not be met, with the Open Space, Sports and Recreation study indicating that additional open space is needed to meet current needs, as well as predicted future needs. This should be addressed in Part 2 of the City Plan when sites are allocated. CP16 should ensure open space is protected and that the open space standards to meet the requirements of existing and future population are met either on or off site.</p> <p>Development at DA7 could actually increase provision of accessible open space, due to the fact the site is privately owned and that public access is not currently permitted and any open space provided in this area would need to refer to the Open Space Sports and Recreation Study and Updates to ensure that the open space provided meets local needs. This gain is reflected in the medium-term score, as the development is anticipated to come forward across the short to medium term.</p>	-	-/+?	-
4) Protect South Downs	<p>Housing development either situated within the built up area, or near the boundary of the SDNP, particularly tall buildings has potential to have an adverse impact on the views from or of the Downs. Development at DA7 has the potential to have a significant negative impact on this objective due to its location, but again will dependent on the scale and height. Any development located on the urban fringe would need to be of low density to ensure that any significant negative impact in terms of views from the Downs are reduced as far as possible as well as to reflect the character of the adjacent neighbourhoods.</p>	-	--	--
5) Provide decent, affordable housing	<p>Policy likely to have a significant positive impact on this objective, through the provision of a minimum of 11,300 dwellings, a proportion of which will be affordable. The policy specifies</p>	++	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>that sites have been identified in Part 1 of the City Plan to deliver 3,635 homes. The policy confirms that Part 2 of the City Plan will allocate additional sites to deliver the housing target. The policy now sets out that the pace of housing will be adjusted according to local need, ensuring an appropriate supply of housing when and as needed.</p> <p>Housing located in the urban fringe is more likely to be of a density associated with traditional family housing, of which there is an identified need in Brighton & Hove.</p> <p>The SA recognises that the amount of housing specified in the policy is below the assessed level of local housing requirements, (GL Hearn, Local Housing Requirements Study Update - 15,800) however it is similar to the target as tested by the South East Plan, where the significant environmental constraints of Brighton & Hove were recognised. The SA does not consider this to have a negative impact on this objective, as 11,300 homes is still a significant amount of housing to be delivered, however the city council will need to undertake discussions with neighbouring authorities in relation to housing provision under the Duty to Cooperate to ensure the amount of housing required by the city is delivered.</p>			
6) Reduce amount of car journeys	<p>Delivery of housing is likely to result in increased levels of car ownership and potentially journeys made by car. Delivery of housing within the built up area will enable people to make sustainable transport choices more easily, due to proximity to sustainable transport, whereas housing delivered on the urban fringe may lead to more journeys made by car due to the location and would require investment in public transport and improvements to access.</p> <p>It is recognised that the majority of Development Areas are located in proximity of existing public transport, therefore reducing the potential for negative impact, however should new housing incorporate provision for parking, then car use is unlikely to be discouraged and therefore strong controls on parking should be promoted where possible, including car free housing for suitably located development.</p> <p>CP9 should contribute towards ensuring that development is situated within areas of good transport links, and ensure that development schemes respond to the demand for travel that they create.</p>	-	--	--
7) Minimise risk of pollution to water	<p>Any development has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution and will be dependant on the site developed. Development at DA7 could have a significant negative impact, as any sites that are in a more natural form will have an important role in absorbing water as well as potentially recharging the Brighton Chalk Aquifer and this would need to be investigated further as part of development proposals.</p> <p>CP8 and CP11 should ensure that appropriate systems are in place to reduce risk of surface water flooding. In addition, groundwater protection is addressed through SA4, although it is important to stipulate that any development on urban fringe sites should incorporate substantial SUDS.</p>	-	--	-
8) Minimise use of water	<p>Delivery of 11,300 new homes will substantially increase water consumption in the area, even with substantial measures to minimise water consumption. It is recognised that</p>	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	development on a Greenfield site is likely to require meeting higher environmental standards, due to the requirements of existing policy, however the impact is still considered to be negative overall. CP8 should ensure that water consumption is minimised as far as possible.			
9) Promote development of contaminated land	It is considered unlikely that housing would be built on previously contaminated land. Therefore there is no direct link with this objective.			
10) Manage coastal defences	Coastal defences could be jeopardised through inappropriately located development and increased risk of coastal flooding could occur through development in coastal locations. Development at DA7 will have positive benefits for this objective due to its location, however overall the majority of housing will be within the built up area, with 2,240 units built within DA2 and DA8 which are situated by the coast on the coastal frontage and in areas of higher flood risk. CP11 should ensure that development is only located in appropriate locations and that site based flood risk assessments are carried out where needed.	-	-	-
11) Employment: balance needs of tourists, residents and businesses	The delivery of this amount of housing will have temporary positive benefits on this objective through job creation at construction stage, as well as through increase in employment opportunities required to service an increased population. It is recognised that housing development could have a negative impact on the provision of employment sites, due to the availability of sites and land available for development and this issue will be addressed in the forthcoming City Plan Part 2. It is also understood that the 2011 SHLAA update recommended that mixed use would be needed on some existing employment sites in order to meet needs.	+	+	+
12) Support economic development	As with objective 11, temporary job creation at construction phase will benefit the local economy, as well as through jobs created through increased services required. Delivery of housing is intrinsically linked to economic growth with the GL Hearn Local Housing Requirements Study 2011 indicating that delivery of around 12,100 houses would support employment growth of around 9% over the plan period. It can therefore be assumed that the delivery of 11,300 homes would support a slightly reduced economic growth.	+	+	+
13) Improve health	Access to decent, affordable housing is one of the wider determinants of health. Health and well-being therefore likely to be improved through implementation of the policy. It is understood that the level of housing proposed does not meet that as assessed as required by the Local Housing Requirements Study Update, however this is not considered to have a negative impact on health, as the delivery of housing has been balanced with what the city can accommodate given its considerable constraints. It is understood that an increased amount of housing delivered would likely to impact on open space provision, as well as provision of employment sites, the loss of which would adversely impact on health, as would delivery of a much higher density of housing. Any proposals for strategic developments would incorporate a Health Impact Assessment, to ensure there is no negative impact on existing communities either during construction or	++	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	operation stage, as well as maximising the potential for positive health outcomes.			
14) Integrate health and community safety	Indirect impact. New housing development can contribute towards improving community safety through incorporating design features to design out crime. (See CP12).	+	+	+
15) Narrow the gap between deprived areas and rest of the city	Policy likely to have a direct positive impact on this objective. Barriers to Housing is one of the sub-domains by which multiple deprivation is measured, and includes measuring difficulty of access to owner-occupation due to income levels. This policy will result in a delivery of a proportion of affordable housing, which should help to increase access to housing opportunities. In addition, employment opportunities arising through construction and through economic growth linked to delivery of housing also likely to contribute towards reducing deprivation. Housing mix, which outlines the specific needs of various communities now covered by policy CP19.	+	+	+
16) Engage local communities	Communities will have the opportunity to be engaged with the planning process, through development control procedures. Significant community engagement would be anticipated for development of DA7.	+	+	+
17) Make the best of previously developed land	Previous trends indicate that a high proportion of housing has been built on PDL (99.7% in 10/11). It is likely that all housing delivered in the development areas, will be on PDL. In addition, housing development situated on major development sites within development areas (with the exception of DA7) is expected to achieve a minimum density of 100dph. Housing delivered at DA7 will be on greenfield land, however this in itself does not mean that the best use of previously developed sites in the city has not been gained. In addition, development at DA7 makes only 6.5% of the total housing delivered.	+	+	+
18) Maximise sustainable energy	New development has potential to increase consumption of energy, therefore contributing towards climate change. CP8 requires all new residential development to achieve zero carbon status and sets various other requirements. In addition, the government requires all new homes to be zero carbon by 2016 meaning that the impact is more likely to be positive in the medium to long term.	-	+	+
19) Taking account of the changing climate	New development could be unsustainable and be of limited longevity if it does not incorporate measures or features to enable it to withstand extremes of temperatures and weather conditions associated with climate change, thereby having the potential to have a negative impact on this objective. In addition, it is recognised that some of the development areas are located in coastal locations, with flood risk increasing as a result of climate change in the long term. However it is understood that all new development, including residential and mixed use is recommended to meet the requirements of CP8, which include contributing to minimising the urban heat island effect through off-site tree-planting, which will help in adaptation to climate change. The loss of a Greenfield sites could potentially exacerbate problems caused by increased	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	rainfall associated with climate change through the increase in impermeable surfacing that is unable to absorb water, and should therefore incorporate significant SUDS. CP8 requires all development to be able to respond to changing needs.			
20) Meet BREEAM / Code for Sustainable Homes	New development could fail to meet high environmental standards having a negative impact on the residents (e.g. through higher energy/water bills) as well as the wider environment. Development at DA7 would require higher environmental standards to be achieved than other areas of the city. CP8 requires new developments to meet various standards in the Code for Sustainable Homes according to size and location.	-	-	-
21) Increasing accessibility	Inappropriately located development could severely impact residents' access to various services, including transport, food and health facilities. However the Development Area policies as well as SA6, CP12, CP13, CP18, and CP9 should ensure that access to services is met. Development at DA7 would not increase accessibility to services, and investment in public transport would be necessary, as well as ensuring that there are local amenities to meet residents basic needs. However, on balance the policy is considered to have a positive impact on this objective.	+	+	+
22) Reduction of waste	Housing development highly likely to create an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy CP2 – Sustainable Economic Development
No requirement for further assessment at this stage

Policy CP3 – Employment Land

This policy incorporates various changes that were assessed against alternative options put forward in the Policy Options Papers (October 2011). The options were assessed against the Sustainability Appraisal Framework. The revisions include:

- policy point 2, the identification of Central Brighton where B1a offices will be protected (option 1(i));
- policy point 3, the naming of primary industrial estates and premises that will be protected and the flexibility to allow further uses on these sites (options 5(i)a and 5(iii));
- policy point 4, the naming of sites where employment-led mixed use will be allowed (option 5(i)b); and
- policy point 5, that sets out the protection of unallocated employment sites and premises and when release for other uses will be permitted (option 3(ii) and 6(ii)).

This policy is linked to and cross-references various other policies which include proposals for employment-based development, including DA2, DA3, DA4, DA5, DA6, DA7, DA8 and SA2. To avoid duplication, this Sustainability Appraisal only covers the broad impacts of development associated with the Development Area and Special Area policies, and in most instances does not go into site specific detail.

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. The safeguarding of existing employment land for employment uses is considered unlikely to have any impact on biodiversity. Re-development on existing sites is considered unlikely to have any adverse impacts on biodiversity, and may bring about opportunities for development to incorporate biodiversity features, having positive benefits. The policy also supports delivery of a large quantity of employment floorspace over the Development Areas, some of which will replace existing and this is unlikely to have adverse impacts on biodiversity. However, some of this will be on undeveloped/Greenfield sites and this may have adverse impacts on biodiversity depending on the site. The impacts of the Strategic Allocations and proposals within Development Areas will be assessed in more detail in the individual policy assessments. CP8 and CP10 should ensure that any upgrades and refurbishments, as well as re-development on existing sites and new developments include opportunities to enhance biodiversity.	-/+?	-/+?	-/+?
2) Improve air quality	The safeguarding and protection of existing employment land/floorspace is unlikely to have any impact on air quality. Re-development on existing sites is also considered unlikely to have any significant impact on air quality. The delivery of additional employment floorspace throughout the city is likely to have a negative impact on air quality as this may result in more journeys made to access employment or through increased economic activity. With the exception of DA7 Toads Hole Valley, it is recognised that the Development Areas are located with good links to sustainable transport and therefore present the opportunity to travel more sustainably, however they are	-	-	-

SA Objective	Summary of effects	Short term	Medium term	Long term
	also located within the AQMA where levels of NO2 already exceed the annual air quality objective at various roadside locations. DA policies and CP9 should contribute towards ensuring that development is situated within areas of good transport links, and ensure that major development schemes respond to the demand for travel that they create.			
3) Maintain local distinctiveness	The safeguarding and protection of existing employment land/floorspace is unlikely to have any impact on this objective. Re-development on existing sites is also considered unlikely to have any adverse or significant impacts, however the references for proposal of upgrades to office and industrial accommodation to include improvements to design may bring about positive impacts for this objective. However, new employment-based development has the potential to have a negative impact on the surrounding Conservation Areas and specific sites or buildings if poor quality design is permitted or is located in inappropriate locations that will impact on historic buildings/conservation areas etc. CP12 should ensure effect is positive and that development achieves high standards of urban design. Employment-based development also has the potential to have a negative impact on open space, if open space is developed for employment uses and may also increase pressure on existing open space (e.g. for use by workers). CP16 should ensure open space is protected from employment-based development.	-/+	-/+	-/+
4) Protect South Downs	Employment based development located within the city-centre Development Areas is unlikely to have any impact on the SDNP. Development at Toads Hole Valley may impact on the landscape setting of the SDNP due to its proximity, as may re-development at some of the named industrial sites, e.g Woodingdean Business Park and Hollingbury Industrial Estate, due to their proximity to the SDNP, however is generally considered to be uncertain. Mitigation in regards to the impacts of development on the SDNP associated with development within DA7 Toads Hole Valley, will be included within the policy itself.	-?	-?	-?
5) Provide decent, affordable housing	It is recognised that the protection of employment sites for employment-uses could have a negative impact on the provision of housing, due to the availability of sites and land available for development. This issue will be addressed in the forthcoming City Plan Part 2. However, it is noted that the policy allows mixed-use development (of employment and residential) on certain existing employment sites that are considered to be suitable. In addition, the policy specifies the circumstances where other sites could be allocated to alternative uses if it can be demonstrated to be redundant and incapable of meeting modern employment needs, one of which is affordable housing.	+	+	+
6) Reduce amount of car journeys	The policy should lead to an increase in employment-based floorspace, which could have both positive and negative impacts in relation to this objective. In terms of positive impacts, increased employment opportunities based within the city, could reduce the need for out-commuting and reduce the need to travel by car to work. However, journeys to work by car within the city could also increase with an increased economic activity, particularly to	-/+	-/+	-/+

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>locations that are not located within good proximity to sustainable transport modes, such as some of the industrial estates. It is noted however that the majority of the Development Areas are located along sustainable transport corridors. Mitigation in regards to the travel impacts of employment based development at DA7 Toads Hole Valley will be included within the policy itself.</p> <p>CP9 requires major developments to respond to the demand for travel they create, which should help to minimise the negative impact although is unlikely to reduce it completely. In addition, CP9 promotes a citywide modal shift, and proposes that bus based rapid transport scheme serve major employment sites.</p>			
7) Minimise risk of pollution to water	<p>Protection of existing industrial estates or mixed use development on existing employment sites are considered unlikely to increase the risk of surface water flood risk and may provide the opportunity to install SUDS. However, any new development on previously undeveloped sites has the potential to increase the urbanised non-permeable surfaces in the city and could therefore increase the risk of surface water flooding and groundwater pollution. In addition, some of the Development Areas are also located in areas of high susceptibility to surface water flood risk and will be assessed in more detail in individual policy assessments. CP8 and CP11 should ensure that appropriate systems in place to reduce risk of surface water flooding.</p>	-	-	-
8) Minimise use of water	<p>The policy states that the council will support proposals which will enable existing office accommodation and industrial estates and premises to be upgraded/refurbished and more detail is provided in the supporting text about the types of proposals that will be supported, which includes measures to improve resource efficiency, and this is likely to bring about positive impacts against this objective.</p> <p>However, the policy is also concerned with delivery of new employment-based development and this is likely to increase will increase demand for water.</p> <p>CP8 should ensure that water consumption is minimised.</p>	-/+	-/+	-/+
9) Promote development of contaminated land	<p>Some of the sites named may have potential for contamination due to their current uses, and redevelopment may provide opportunity for remediation, although this is uncertain.</p>	+?	+?	+?
10) Manage coastal defences	<p>It is recognised that DA2 Brighton Marina and DA8 Shoreham Harbour are located in areas that may be more vulnerable to tidal flooding.</p> <p>CP11 should ensure that development is only located in appropriate locations and that development in areas of high flood risk is planned sequentially to reduce the risk.</p>	-	-	-
11) Employment: balance needs of tourists, residents and businesses	<p>Safeguarding of existing, refurbishment of existing and provision of new employment space is a key aim of this policy and is therefore likely to have a significant positive impact on this objective. However, there is some degree of uncertainty as the amount of employment floorspace to be delivered is lower than the amount as assessed as required. However, overall, the policy is likely to lead to: an increase in employment floorspace, investment in existing sites and premises potentially leading to increased productivity, and creation and safeguarding of jobs in various sectors through provision of appropriate workspace that meet</p>	++?	++?	++?

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>their needs. Although the policy allows mixed use development on some named sites and other un-named sites where redundancy can be proven, the tests for redundancy set out in the Supporting Text are considered to be robust and are not considered to allow redundancy to occur.</p> <p>The policy now makes reference to allocating additional sites in Part 2 of the City Plan. This will be needed to support job and economic growth.</p>			
12) Support economic development	<p>This is a key aim of this policy and as objective 11, the policy is likely to have a significant positive impact in supporting the local economy, helping the local economy grow and supporting provision of employment opportunities, however is also considered uncertain due to the amount of employment floorspace identified being less than the assessed amount required. Naming of sites which will be protected and where redevelopment/refurbishment will be encouraged may help to bring development forward. The City Plan Part 2 will need to ensure adequate provision of employment sites, to ensure the economy is not constrained.</p>	++?	++?	++?
13) Improve health	<p>Access to meaningful employment opportunities is a wider determinant of health, therefore the policy is likely to have a positive impact on this aspect of the objective, provided that the other potentially negative impacts highlighted through the SA are minimised or reduced as far as possible, particularly the issue relating to increased congestion.</p>	+	+	+
14) Integrate health and community safety	<p>Indirect impact. New employment-based development can contribute towards improving community safety through incorporating design features to design out crime. (See CP12). In addition, it is recognised that mixed use developments contribute towards creating safer communities through encouraging natural surveillance and footfall at different times of the day.</p>	+	+	+
15) Narrow the gap between deprived areas and rest of the city	<p>The policy should lead to increased opportunities for employment throughout the city, but also in areas where employment-based deprivation is high through the Development Area policies and should therefore have positive impacts on this objective.</p>	+	+	+
16) Engage local communities	<p>There is no direct link with this objective.</p>			
17) Make the best of previously developed land	<p>As the policy is concerned with increasing employment-land provision in the city, any re-development on a site currently used for employment is likely to increase employment provision on that site, therefore make better use of PDL. In addition, re-development on existing sites that may lead to increased economic output, will also make better use of PDL.</p>	+	+	+
18) Maximise sustainable energy	<p>The policy states that the council will support proposals which will enable existing office accommodation and industrial estates and premises to be upgraded/refurbished and more detail is provided in the supporting text about the types of proposals that will be supported, which include energy efficiency, having a positive impact on this objective. However, new development has potential to increase consumption of energy, therefore contributing towards climate change.</p> <p>CP8 requires all new non-residential major development to achieve various BREEAM standards, according to size, and in addition, the government's target for all new non</p>	-/+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	residential development to be zero carbon by 2019 will have a positive impact against this objective in the medium to long term.			
19) Taking account of the changing climate	New development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. CP8 requires all development to be able to respond to changing needs.	-	-	-
20) Meet BREEAM / Code for Sustainable Homes	New development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various standards of BREEAM depending on their size or location.	-	-	-
21) Increasing accessibility	The policy is concerned with increasing provision of employment-based land and potentially increasing productivity on existing sites and therefore should help increase access to employment opportunities. It is noted that the majority of Development Areas are situated within good access to sustainable transport.	+	+	+
22) Reduction of waste	Any new development is highly likely to create an increase in waste, both during construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

Policy CP4: Retail Provision

No requirement for further assessment at this stage

Policy CP5: Culture & Tourism

No requirement for further assessment at this stage

Policy CP6: Hotel and Guest House Accommodation

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. Any new development has potential to harm biodiversity existing on site. CP8 and CP10 should ensure effect is positive and enhances biodiversity.	-	-	-
2) Improve air quality	Direct impact. The policy seeks to ensure that new development will be directed towards central Brighton, therefore potentially allowing easier access by public transport which may have an associated impact on air quality.	+	+	+
3) Maintain local distinctiveness and sites	Direct impact. The direction of new development into the core zone should help to ensure that local distinctiveness of adjacent areas is maintained. In addition, the need for redundant hotels to demonstrate that their proposed new use will be compatible with the character of the local area, should also achieve positive outcomes against this objective.	+	+	+
4) Protect South Downs	Indirect impact. As with objective 3, the direction of new development into the core zone should ensure the protection of the South Downs.	+	+	+
5) Provide decent, affordable housing	Direct impact. The policy allows change of use into residential, provided that certain tests of redundancy can be demonstrated. This may have positive implications for this objective, although is uncertain.	+?	+?	+?
6) Reduce amount of car journeys	Direct impact. As with objective 2, the direction of new development within central Brighton allows for easier access by public transport, therefore reducing the need to travel by car. In addition, a central location would also facilitate ease of access to other visitor attractions.	+	+	+
7) Minimise risk of pollution to water	Indirect impact. Any new development is likely to cause an increase in urbanised impermeable surfaces, increasing the risk of surface water flooding and potential of groundwater pollution. CP8 and CP11 -should ensure that appropriate systems in place, e.g. SUDS, to reduce risk of surface water flooding.	-	-	-
8) Minimise use of water	Indirect impact. New hotel development will cause an increase in the demand for water, and therefore must be minimised through incorporation of highly efficient water-saving technologies. CP8 should ensure that water consumption is minimised and seeks new development to aspire towards water neutrality.	-	-	-
9) Promote development of contaminated land	There is no link to this objective.			
10) Manage coastal defences	There is no link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. Retention of existing hotel and guest house accommodation as well as the building of new hotels will generate employment opportunities, both at construction and operation stage. In addition, the priority committing the council to work with the hotel industry to create apprenticeships and local jobs should help to support local employment.	+	++	++
12) Support economic development	Direct impact. The visitor economy brings in a substantial amount of money into the city. Retention of existing hotel and guest house accommodation as well as new hotel development will help to support this economic activity within the city. The policy wording regarding change of use is considered give more flexibility to hotels found within the hotel	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	core zone and is considered strong enough so as not to encourage change of use, which may have adverse impacts on the local economy. This may be required in the current economic climate and may help to bring about change of use of unviable visitor accommodation into other uses, being of benefit to the local economy. The requirement of an impact assessment for new hotel accommodation should ensure that any new build does not have a detrimental impact on existing accommodation.			
13) Improve health	There is no link to this objective.			
14) Integrate health and community safety	There is no link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	There is no link to this objective.			
16) Engage local communities	There is no link to this objective.			
17) Make the best of previously developed land	Direct impact. New development will be directed to the central Brighton area, therefore is highly likely to be situated on previously developed land.	+	+	+
18) Maximise sustainable energy	Indirect impact. New hotel development has potential to increase consumption of energy, therefore contributing towards climate change. CP8 requires all development proposals (including non-residential) to incorporate energy efficient measures and use low/zero carbon technology. In addition, government targets for all new non-residential development to be zero carbon by 2019, should ensure the impact is positive in the long term.	-	-	+
19) Taking account of the changing climate	Indirect impact. New hotel development could be unsustainable and have limited longevity if it does not incorporate measures or features to enable it to withstand extremes in weather conditions likely to occur with climate change. CP8 requires all development to be able to respond and adapt to changing needs.	-	-	-
20) Meet BREEAM / Code for Sustainable Homes	Indirect impact. New hotel development could fail to meet high environmental standards having a negative impact on the wider environment. CP8 requires new developments to meet various BREEAM or equivalent standards.	-	-	-
21) Increasing accessibility	There is no link to this objective.			
22) Reduction of waste	Indirect impact. New hotel development is likely to cause an increase in waste production, at construction and operation stage. CP8 should ensure that waste is minimised at operation stage and other existing local and national policy should ensure construction & demolition waste is minimised.	-	-	-

CP7: Infrastructure and Developer Contributions
No requirement for further assessment at this stage

Policy CP8: Sustainable Buildings

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Direct impact. The policy is likely to have a positive impact on biodiversity, as the policy requires developments to demonstrate how they will enhance biodiversity. In addition, the policy includes the requirement for developments to reduce the heat island effect, which can be achieved through planting, and requires developments to encourage food growing, which would also have positive impacts on biodiversity. In addition, meeting requirements of BREEAM/CSH will also ensure the consideration of biodiversity, with impacts considered to be more significant in the medium to long term.	+	++	++
2) Improve air quality	Direct impact. The policy is likely to have a positive impact on improving air quality, as the policy requires development to demonstrate how they will reduce air pollution. In addition the requirements of BREEAM/CSH will also ensure that air pollutants are minimised (e.g. NOx from heating systems) as well as includes sections of provision for cycle storage, which would have an indirect impact.	+	+	+
3) Maintain local distinctiveness and sites	There is no direct link with this objective.			
4) Protect South Downs	There is no direct link with this objective.			
5) Provide decent, affordable housing	Although a sustainable home which minimises energy consumption and therefore reduces the cost of living for occupants will make living in the house more affordable and therefore contribute towards reducing fuel poverty, the costs of building highly sustainable homes may conflict with the viability of providing housing, including affordable housing. Meeting high standards could jeopardise delivery of housing, particularly in the current economic climate. However, the supporting text does state that financial viability of a scheme will be a consideration.	-	-	-
6) Reduce amount of car journeys	Indirect impact. The policy is likely to have a positive impact on this objective, as BREEAM/CSH standards includes sections on provision of areas for cycle storage, although is not specific about proximity to public transport or car free housing.	+	+	+
7) Minimise risk of pollution to water	The policy is likely to have a positive impact on minimising the risk of pollution to groundwater, as the policy requires development to demonstrate how they will reduce surface water run-off and should help to meet the requirements of the Water Framework Directive. In addition CSH includes a section dedicated to surface water run-off.	+	+	+
8) Minimise use of water	The policy is likely to have a significant positive impact on this objective in the medium and long term, through the requirement to meet various high standards in reduction of water consumption as required by BREEAM or CSH, with standards increasing in line with building regulations from 2016 and 2019. The policy also requires developments to demonstrate how they will aspire to water neutrality and this, in addition to the standards required to be achieved in the short term is reflected in the positive short term score.	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
9) Promote development of contaminated land	There is no direct link to this objective.			
10) Manage coastal defences	There is no direct link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	There is no direct link to this objective.			
12) Support economic development	There is no direct link to this objective.			
13) Improve health	Indirect impact. The policy is likely to have a positive impact on health, through provision of decent housing with low energy costs and the potential for energy improvements to existing housing stock, therefore minimising the risk of fuel poverty; through enhancements to biodiversity and encouragement of food growing which can improve health and well-being; through improvements to air quality, through encouragement of use of healthy forms of transport; through protection of groundwater resources through reducing surface water run-off; and through minimising the wider health issues associated with climate change through potential reductions in carbon emissions. In addition, Code for Sustainable Homes includes a section dedicated to health and wellbeing, with sections on access to private open space, maximising natural daylight, ensuring adequate sound insulation and meeting requirements of Lifetime Homes.	+	++	++
14) Integrate health and community safety	There is no direct link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	Indirect impact. The policy is likely to have a positive impact on this objective, through the potential to reduce risk of fuel poverty, due to reduction in living costs associated with more energy efficient housing, as well as through the potential for energy efficiency improvements to existing building stock. In addition, the requirement for development to connect to or make a contribution towards decentralised energy schemes, such as district heating could also help to reduce fuel poverty.	+	+	+
16) Engage local communities	There is no direct link to this objective.			
17) Make the best of previously developed land	Direct impact. The policy is likely to have a positive impact on this objective, as the policy requires developments to demonstrate how they will make the most effective use of land.	+	+	+
18) Maximise sustainable energy	Direct impact. This is one of the objectives whereby the policy is likely to have a significant positive impact in the medium to long term, with the reduction in CO2 emissions being one of the key aims of the policy. This will be achieved through the design of buildings, as well as through energy efficiency measures that reduce consumption of energy. The policy also now makes a specific requirement for development to incorporate renewable energy technologies, and connect to or makes contributions to low/zero carbon energy schemes. Despite the change in standards in the short term, the results are still considered to be	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
	positive in the short term, as the policy still requires development to be zero carbon, and significantly positive in the medium to long term reflecting the higher standards sought. The financial offset mechanism in the policy should also assist in reducing carbon emissions associated with exiting building stock, which will also have positive impacts against this objective.			
19) Taking account of the changing climate	Direct impact. The policy is likely to have a positive impact on this objective, as the policy requires developments to demonstrate how they will address climate change adaptation and use sustainable materials.	+	+	+
20) Meet BREEAM / Code for Sustainable Homes	Direct impact. The standards have been relaxed in the short term, which brings them into line with building standards, reflected in the short term score, which is still positive, but not as significantly positive as the medium and short term score. However, post 2016 and 2019, standards increase and are reflective of previous iterations of the policy, resulting in significant positive impacts in the medium and long term against this objective.	+	++	++
21) Increasing accessibility	There is no link with this objective.			
22) Reduction of waste	Direct impact. The policy is likely to have a positive impact on the reduction of waste, as the policy requires developments to demonstrate how they will minimise waste and facilitate recycling, composting and re-use of materials. The supporting text also makes reference to aspiring towards waste neutral developments. In addition, waste is an issue addressed through CSH, which includes construction waste associated with development at construction stage.	+	+	+

Policy CP9: Sustainable Transport

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	<p>Implementation of park and ride was previously found to have a risk of adverse impacts on this objective, due to potential for harm to biodiversity on site. The SA considers that the use of existing car parks for park and ride will not have any impact on biodiversity, as the sites are already being used for this purpose and that any impacts would have been assessed at planning application stage as acceptable, however any increased capacity at these car parks may cause impacts depending on the site. Therefore the impact is considered to be uncertain.</p>		?	?
2) Improve air quality	<p>As air quality is intrinsically linked to traffic and transport, this is one the key objectives that this policy will impact upon. There are a number of measures in the policy that should bring about positive gains for air quality, including provision of cross boundary sustainable transport links, direction of development into areas with good transport links, bus priority routes, potential for increase in electric vehicles, an improved cycle network and travel plans, and a strategy to reduce the number of freight deliveries in the city centre. All these measures should help to either reduce the need to travel either by car or other vehicle (e.g. bus) or will improve existing sustainable transport provision that can have air quality benefits when compared to travel by a single occupied private motor car.</p> <p>There are many areas in the city that fall within the declared AQMA and many of these locations fall within the proposed Development Areas and the direction of significant development to these areas could worsen air quality in these areas and development in these locations should ensure that sensitive receptors are located away from the roadside. It is accepted that some vehicles, particularly heavier vehicles including HGVs and buses are more polluting than the car, and that in some locations modal shift may not achieve air quality benefits, as air quality can be influenced by a range of other factors other than volume of traffic, including streetscape and type of vehicle prevalent (e.g. with buses, HGVs and diesel vehicles more polluting than cars) however in these locations the improvements in road safety and reduced congestion that are considered likely to occur through some of the measures outlined in the policy are considered to be of equal value. In addition, a freight strategy should help to achieve positive gains for air quality in central locations.</p> <p>The SA notes that the policy contains a form of park and ride, as outlined by policy point A1b, whereby existing car parks are made use of for park and ride purposes. The impacts of this on air quality around the site are uncertain and would need to be assessed as part of a wider transport assessment, and would be dependant on a range of factors, including site location, access and existing local air quality. This form of park and ride could simply result in a displacement of the problem and would need to be monitored.</p> <p>On balance, the measures outlined in the policy are considered to have positive impacts on air quality.</p>		+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
3) Maintain local distinctiveness and sites	Implementation of park and ride was previously found to have a risk of adverse impacts on this objective, due to potential for harm to adjacent sites, such as Conservation Areas and so on. The SA considers that the use of existing car parks for park and ride will not have any impact on this objective, as the sites are already being used for this purpose and that any impacts would have been assessed at planning application stage as acceptable, however any increased capacity at these car parks may cause impacts depending on the site. Therefore the impact is considered to be uncertain.		?	?
4) Protect South Downs	Implementation of park and ride was previously found to have a risk of adverse impacts on this objective, due to potential for harm to the setting of the SDNP. The SA considers that the use of existing car parks for park and ride will not have any impact on this objective, as the sites are already being used for this purpose and that any impacts would have been assessed at planning application stage as acceptable, however any increased capacity at these car parks may cause impacts depending on the site. Therefore the impact is considered to be uncertain.		?	?
5) Provide decent, affordable housing	There is no link with this objective. The SA notes and welcomes that the policy states new guidance on parking will be produced which will include criteria for car free housing.			
6) Reduce amount of car journeys	<p>The intent of the policy is to ensure a sustainable transport system is in place to accommodate new development, will support the city in its various roles and improve accessibility. The policy infers that modal shift is promoted and that measures will be provide to facilitate this.</p> <p>The policy includes a number of positive measures which the SA believes should reduce the amount of journeys made by car including: improvements to public transport both within the city and to adjoining authorities, the requirement that bus services serve key development sites, improved public realm, implementation of an integrated cycle network, and implementation of travel plans. In addition, the direction of development to areas in the city that have good existing transport links, should also help to reduce the need to travel by car, as should the commitment to secure investment in less accessible DAs. In addition, intelligent transport systems which includes measures such as traffic signal optimisation systems for junctions and variable message signs should help to ensure the traffic flows within the city, helping to reduce congestion in some places.</p> <p>As described under 2, the use of existing car parks as park and ride sites, is one of the proposals of this policy. The SA notes that there has been a range of studies elsewhere conducted ¹¹⁹ on the environmental and economic impacts of park and ride many of which conclude that although there are benefits in terms of reducing city centre congestion, which</p>		+	+

¹¹⁹ Studies looked at include: **The Effectiveness and Sustainability of Park and Ride (RPS); Does Park and Ride assist in local transport integration (Pankhurst); and The Economic and Environmental Roles of Park and Ride (Pankhurst).**

SA Objective	Summary of effects	Short term	Medium term	Long term
	<p>has other localised benefits e.g. air quality, health and road safety in that location, that it can result in a displacement of issues, such as increased congestion, reduced air quality and road safety issues around the site itself, which would need careful monitoring. In addition, the potential benefits of park and ride will only occur if the freed up road space or parking spaces are not taken up by newly generated trips. The SA has previously suggested that unless park and ride is associated with a reduction in the number of car parking spaces in the city, then an overall increase in car usage may occur through freeing up existing capacity. The SA notes the policy point on parking should ensure that the parking capacity in central areas is not increased.</p> <p>The SA welcomes the text relating to minimising off-street car parking provision in accessible areas and the commitment to produce a policy on car free housing which is referred to in the SA assessments as providing mitigation for a range of policies in the city plan.</p> <p>The SA notes and welcomes that the policy now refers to delivery of a rapid bus-based service covering east-west and north-south routes.</p> <p>Despite the unknown impacts relating to park and ride, and the risks for displacement of problems, the SA finds the impact of the policy on this objective to be positive overall.</p>			
7) Minimise risk of pollution to water	Implementation of park and ride was previously found to have a risk of adverse impacts on this objective, due to potential to change sites from a natural form into areas of hard surfacing. The SA considers that the use of existing car parks for park and ride will not have any impact on this objective, as the sites are already being used for this purpose and that any impacts would have been assessed at planning application stage as acceptable, however any increased capacity at these car parks may cause impacts depending on the site. Therefore the impact is considered to be uncertain.		?	?
8) Minimise use of water	There is no link with this objective.			
9) Promote development of contaminated land	There is no direct link with this objective.			
10) Manage coastal defences	There is no link with this objective.			
11) Employment: balance needs of tourists, residents and businesses	The policy is likely to have a positive impact on this objective, through ability to access employment opportunities by various means both within and outside the city. In addition, increased travel choice which could facilitate visitor access to the city, e.g. for retail/tourism through the park and ride scheme would support further employment opportunities arising through people visiting Brighton.	+	+	+
12) Support economic development	As objective 11 above. In addition, a good transport system is integral to supporting economic growth. The measures outlined in the policy should ensure that congestion is reduced within the city, enables people to access employment opportunity both in and	+	+	+

SA Objective	Summary of effects	Short term	Medium term	Long term
	outside the city and enables the deliveries of goods, all helping to support economic development.			
13) Improve health	One of the main aims of the policy is to reduce the impact of car journeys on people's health, safety and quality of life and overall the impact is considered to be positive against this objective. As described under objective 6, the policy includes a range of measures that may reduce journeys made by car in the city, and this should result in positive health impacts including potential improvements in air quality, reduced traffic noise and improved road safety. In addition, the policy should result in measures that promote cycling and walking, which directly impacts on physical and mental health, and now specifically commits to providing parking provision for disabled people, recognising their needs. The delivery of policy point A1b may result in displaced impacts and result in worsened congestion and air quality around the localised sites when in use, potentially impacting on adjacent communities, and this would need to be assessed as part of any proposals and it is noted that the supporting text refers to ensuring there will be no significant adverse impacts on residential amenity.	+	+	+
14) Integrate health and community safety	Any reduction in traffic has benefits for road safety. In addition, recognition of the needs of people with mobility issues and disabled parking provision will support the safety of this sensitive community.	+	+	+
15) Narrow the gap between deprived areas and rest of the city	Lack of accessible transport is directly linked to social exclusion, with individuals facing social exclusion likely to be living in the more deprived areas of the city. The policy seeks to identify priorities for sustainable transport improvements in all residential areas and is therefore likely to result in a positive impact against this objective.	+	+	+
16) Engage local communities	The policy provides potential for significant engagement with the community, particularly in identification of priorities for safer streets, improvements to public realm and improvements to public transport in residential areas.	+	+	+
17) Make the best of previously developed land	Although there is no direct link to this objective, delivery of policy point A1b could result in increased use of existing car parks, which could be argued as making better use of existing sites.			
18) Maximise sustainable energy	There is no link to this objective.			
19) Taking account of the changing climate	Implementation of park and ride was previously found to have a risk of adverse impacts on this objective, due to potential to change sites from a natural form into areas of hard surfacing, which may reduce the city's ability to adapt to climate change and predicted increases in rainfall, or temperature. However the SA considers that the use of existing car parks for park and ride will not have any impact on this objective, as the sites are already being used for this purpose, however any increased capacity at these car parks may cause impacts depending on the site. Therefore the impact is considered to be uncertain.		?	?
20) Meet BREEAM / Code for Sustainable Homes	There is no link to this objective.			

SA Objective	Summary of effects	Short term	Medium term	Long term
21) Increasing accessibility	The policy is likely to have a significant positive impact on this objective, through improvements and increased provision of sustainable transport choices to key destinations to access services. In addition, location of significant development in areas with good existing public transport will facilitate access to services.	+	++	++
22) Reduction of waste	There is no link to this objective.			

CP10: Biodiversity

No requirement for further assessment at this stage

CP11: Flood Risk

No requirement for further assessment at this stage

Policy CP12: Urban Design

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	Indirect impact. Identification of areas/sites through Urban Design Framework likely to protect existing habitats and biodiversity (Strong links with CP13). Also, see objective 4.	+	+	+
2) Improve air quality	Indirect impact. Mixed use developments and tall buildings alongside good public transport links have the potential to reduce the need to travel by unsustainable means, potentially leading to improvements in air quality in long term.		+	+
3) Maintain local distinctiveness and sites	Direct impact and key aim of policy. Policy will ensure the preservation of strategic views, existing buildings, sites, and areas of archaeological heritage of particular character, as well as improve the standard of new architecture. Supporting text clarifies that the impact of tall building will be assessed against heritage assets.	+	++	++
4) Protect South Downs	Direct impact. Views from and of the Downs should be protected through location of tall buildings and commitment for low-medium rise development elsewhere, and also through the requirement to protect strategic views in and out of the city. Policy point 5 should also help to achieve a positive impact on this objective as should ensure development has regard to the purpose of the SDNP when it falls within its setting.	++	++	++
5) Provide decent, affordable housing	No link to this objective.			
6) Reduce amount of car journeys	Indirect impact. See objective (2).		+	+
7) Minimise risk of pollution to water	No link to this objective.			
8) Minimise use of water	No link to this objective.			
9) Promote development of contaminated land	No link to this objective.			
10) Manage coastal defences	No link to this objective			
11) Employment: balance needs of tourists, residents and businesses	Indirect impact. As high density / tall buildings may be needed for reasons of economic viability (for all types of development including residential, commercial, hotels), policy likely to have positive impact on employment and economic development.		+	+
12) Support economic development	As objective 11 above.		+	+
13) Improve health	Direct impact. Policy likely to lead to improvements in accessibility and creation of more inclusive environments, meeting the needs of all sections of the community and helping to reduce health inequalities. Areas with potential for tall buildings chosen due to location near to sustainable transport, therefore improving access to other services.		+	+
14) Integrate health and community safety	Direct impact. Policy likely to lead to improvements in community safety through incorporation of features that design out crime or reduce the fear of crime.	+	++	++

SA Objective	Summary of effects	Short term	Medium term	Long term
15) Narrow the gap between deprived areas and rest of the city	Direct impact. Some areas identified for tall buildings situated within deprived areas of the city, therefore should make a positive contribution to the regeneration of these areas. Also, see objective 13.		+	+
16) Engage local communities	No link to this objective.			
17) Make the best of previously developed land	Direct impact. Policy promotes the most effective and efficient use of land in the appropriate location and will therefore make the best use of PDL.		++	++
18) Maximise sustainable energy	No link to this objective			
19) Taking account of the changing climate	Indirect impact. Policy recognises that planted green spaces that have health benefits can also aid urban cooling. This may have greater benefits in the long term when the impacts of climate change become more apparent.			+
20) Meet BREEAM / Code for Sustainable Homes	Direct impact. Policy likely to lead to an increase in standards of architecture and design. In addition, policy likely to lead to compliance with the Lifetime Homes standard, which is also one of the key topics covered under the Health and Wellbeing issue within CSH. Links to CP8.		+	+
21) Increasing accessibility	Direct impact. Policy will increase accessibility through ensuring buildings achieve inclusive design. In addition, new development likely to lead to improvements in accessibility to services, through promotion of mixed use developments, as well as promotion of tall buildings on good sustainable transport links.		++	++
22) Reduction of waste	No link to this objective.			

CP13: Public Streets and Spaces

No requirement for further assessment at this stage

CP14: Housing Density

No requirement for further assessment at this stage

Policy CP15: Heritage

SA Objective	Summary of effects	Short term	Medium term	Long term
1) Protect and enhance biodiversity	There is no link to this objective.			
2) Improve air quality	There is no link to this objective.			
3) Maintain local distinctiveness and sites	Direct impact. The city's historic landscapes, buildings and other sites should be retained, protected and enhanced through implementation of this policy. The policy specifically references the importance of the local historic built environment and commits that existing heritage guides local distinctiveness for new development in historic areas. The policy refers to prioritising heritage assets at risk, which further strengthens the policy against this objective and now also commits the council to promoting heritage.	++	++	++
4) Protect South Downs	There is no link to this objective.			
5) Provide decent, affordable housing	There is no link to this objective.			
6) Reduce amount of car journeys	There is no link to this objective.			
7) Minimise risk of pollution to water	There is no link to this objective.			
8) Minimise use of water	There is no link to this objective.			
9) Promote development of contaminated land	There is no link to this objective.			
10) Manage coastal defences	There is no link to this objective.			
11) Employment: balance needs of tourists, residents and businesses	Direct impact. The local historic built environment plays a major role attracting tourists to the city and the city's economy. The policy will lead to protection and enhancement of historic built environment as well as maintain the cultural offer of the city that benefits residents and visitors to the city. Policy recognises the role of the South Downs and the potential role in promoting "eco-tourism".	+	+	++
12) Support economic development	As with objective 11. Direct impact. Economic activity associated with tourism likely to increase through protection of existing assets.	+	+	++
13) Improve health	There is no link to this objective.			
14) Integrate health and community safety	There is no link to this objective.			
15) Narrow the gap between deprived areas and rest of the city	There is no link to this objective.			

SA Objective	Summary of effects	Short term	Medium term	Long term
16) Engage local communities	The policy commits to a review of the Conservation Strategy as well as the Local List which will involve the local community therefore having positive impacts on this objective.	+	+	+
17) Make the best of previously developed land	There is no link to this objective.			
18) Maximise sustainable energy	There is no link to this objective.			
19) Taking account of the changing climate	The policy makes provision for how proposals, which may provide mitigation for climate change, but may cause harm to a heritage asset, will be considered.	+	+	+
20) Meet BREEAM / Code for Sustainable Homes	There is no link to this objective.			
21) Increasing accessibility	There is no link to this objective.			
22) Reduction of waste	There is no link to this objective.			

CP16 Open Space

No requirement for further assessment at this stage

CP17 Sports Provision

No requirement for further assessment at this stage

CP18 Healthy City

No requirement for further assessment at this stage

CP19 Housing Mix

No requirement for further assessment at this stage

CP20 Affordable Housing

No requirement for further assessment at this stage

CP21 Student Accommodation and Housing in Multiple Occupation

No requirement for further assessment at this stage

CP22 Traveller Accommodation

No requirement for further assessment at this stage

Appendix E Consultation Responses

Draft City Plan Part 1 – May 2012

One response was received from the Environment Agency as follows:

Representation	Response	Action
We are pleased to see that you have amended your SA Indicator for SA objective 7 'Minimise the risk of pollution of water resources in all development' to refer to Water Framework Directive status.	Comment welcomed.	No further action required.

Representations made on former stages of the City Plan/Core Strategy Sustainability Appraisals can be found in the following documents which are available to view on the Sustainability Appraisal pages on the council's website.

Policy Options Papers
Proposed Amendments Papers
Revised Preferred Options
Preferred Options
Scoping Report

Appendix F: Summary of options relating to development on the urban fringe, sustainability appraisal findings, and the identification of Toads Hole Valley as a strategic opportunity for development.

Core Strategy: Issues and Options (2005) and Preferred Options (2006)

Options for Growth

Five approaches to growth were put forward at Issues & Options stage with a view to forming the Spatial Strategy for the city. The approaches to growth were:

- A – an accessibility-led approach
- B – a regeneration-led approach
- C – an urban character-led approach
- D - limited development and expansion on the urban fringe
- E – identification of large strategic development sites to provide at least 1000 homes

Growth option D allowed for limited development on the urban fringe if justified, whilst still optimising development opportunities within the existing built up area. This would include areas of poor quality urban fringe on the outer edges of the city that were not subject to any formal designation.

Sustainability Appraisal findings

The SA considered approaches A to D, together with a business as usual scenario. Option E – identification of large strategic development sites was discarded as an overall approach to growth due to doubts over the deliverability of such an approach.

The SA concluded that none of the approaches A to D should be applied in isolation. In relation growth option D, limited development on the urban fringe may be needed to relieve pressure on the built up areas, including the historic built environment, but that mitigation would be needed to reduce negative and enhance positive impacts.

Following the Sustainability Appraisal and consultation responses, the approaches to growth options A and C were combined to form Preferred Options SS1 in the Preferred Options document. The approach to growth option D was considered in more detail as a cross-cutting theme (see Urban/Rural Fringe policy).

Employment Policy

Options put forwarded included:

- 1 – protection of existing office and industrial sites
- 2 – allocate sites capable of providing 20,000sqm additional office floorspace
- 3 – safeguard other non-allocated employment sites
- 4 – encourage the creation of flexible, affordable business space
- 5 – provide additional employment business stock on urban fringe sites on the north of the city
- 6 – Business as usual

Sustainability Appraisal findings

The SA concluded that options 1 to 4 had the most potential for positive impact. The SA found that option 5 was not the most sustainable option, due to the potential for adverse impacts, however considered that this option could be useful in the long term provided that development was restricted.

Following the Sustainability Appraisal and consultation responses, the preferred employment policy was a combination of options 1 to 4, as described above.

Urban/Rural Fringe Policy

Options put forward included:

- 1 – a pro-active approach to change within and management of the urban fringe, with the Green Infrastructure Network being the primary factor for establishing scope for change or development.
- 2 – not to have a specific policy but to rely on a combination of other policies, such as Countrywide & Open Space.
- 3 – a policy which positively supports development of some urban fringe sites for housing and employment uses as part of a long term strategy for accommodating growth.
- 4 – Business as usual

Sustainability Appraisal Findings

The SA concluded that option 1 was the most sustainable option. The SA concluded that although option 3 was not the most sustainable option, that development on the urban fringe may reduce the carrying capacity of the city and that development on some areas of urban fringe could potentially lead to environmental enhancement.

Following the Sustainability Appraisal and consultation responses, the preferred urban fringe policy was based on option 1, as described above.

Core Strategy: Revised Preferred Options 2008

Policy SA4 – Urban Fringe

Options put forwarded included:

- 1- protection and enhancement of land between the built up area and the South Downs National Park and a clear approach set out for assessing development proposals.
- 2 – to have no specific approach to the urban fringe but rely on a combination of other policies.
- 3 – to have a policy which positively supports development of some sites on the urban fringe for housing and employment uses as part of a long term strategy for accommodating growth.
- 4 – Business as usual

Sustainability Appraisal Findings

The SA concluded that option 1 was the most sustainable options and had most potential for positive impact. At the time of the assessment, option 3 was found to raise too much uncertainty and potential for negative impacts.

Following the Sustainability Appraisal and consultation responses, the preferred urban fringe policy was based on option 1, as above.

Core Strategy: Proposed Amendments Paper 2009

Findings from the Strategic Housing Land Availability Assessment (2008) indicated that the housing target required locally (as identified in the Regional Spatial Strategy) could only be met through significant reliance on windfall development. Housing development on urban fringe sites may be required in the longer term as a contingency measure should

anticipated windfall delivery, and delivery from identified sites not meet planned targets for housing. This resulted in significant changes to policies SA4 Urban Fringe and CP11 Housing Delivery and required a further stage of consultation.

Options for the policies were not put forward or assessed at this stage, as it was deemed that options for development on the urban fringe had been considered at previous stages of the Core Strategy development (as outlined above under Preferred Options and Revised Preferred Options) and had been assessed through the Sustainability Appraisal process. Draft policies which included the significant changes in policy position were published.

Policy SA4 Urban Fringe and CP11 Housing Delivery

The significant change to the above policies was: to allow for land release within the urban fringe for residential development to be considered on a contingency basis post 2020, should monitoring indicate projected shortfalls against the strategic housing requirement.

Sustainability Appraisal Findings

The Sustainability Appraisal concluded that housing development on the urban fringe could have a variety of adverse impacts including impacting on biodiversity, on the surrounding landscape, congestion and on the groundwater resource. The SA concluded that these impacts would require mitigation. The SA also concluded that housing on the urban fringe could have some positive impacts within the built up area, as may reduce the pressure to build to certain levels in this area having associated positive impacts. In addition, the SA concluded that housing on the urban fringe has potential to increase availability of usable open space, particularly through the release of some urban fringe sites which are privately owned, and would be likely to result in the delivery of family-type housing, for which there is a need locally.

The policies put forward in the Proposed Amendments Paper were carried forward into the Proposed Submission Core Strategy.

Strategic Housing Land Availability Assessment (2008)(published 2009)

In 2009, the SHLAA review included an assessment of 49 sites located in the urban fringe, which was included in a technical paper to support the Core Strategy Proposed Submission. The assessment looked at the sites' potential for housing and identified constraints including policy constraints, but also constraints to development including potential landscape impacts including impacts on the South Downs National Park, nature conservation impacts, historic or heritage impacts, the current use of the site, e.g. allotment, playing field or in other open space uses, the topography, archaeological sensitivity, contamination issues, access, and local plan designations.

Sites were coded "3" or "4". Code 3 was given to sites that were considered to have some potential for housing but where there were outstanding constraints, meaning that a timeframe for development was unable to be assigned to the site. Code 4 was given to sites that were not considered suitable for housing development. Of the 49 sites, only 7 were coded "3". Of these sites, the Toads Hole Valley site was considered to be the only site of strategic opportunity for housing development located within the urban fringe.

Strategic Housing Land Availability Assessment (2010) (published 2011)

In September 2010, consultants GVA Grimley were instructed to undertake a comprehensive update of the SHLAA for the city. This followed the suspension of the Core

Strategy Examination following concerns highlighted by the appointed Planning Inspector regarding the council's housing delivery strategy and robustness of its SHLAA. The purpose of the 2010 SHLAA was to provide an up to date and robust evidence base to help inform future plan making and particularly the process of determining local housing requirements and targets for the provision of new housing in the city. The approach taken followed the CLG Practice Guidance for undertaking SHLAAs. The assessment drew upon a long list of sites compiled from nine sources which included previous SHLAA sites; a call for sites exercise; urban fringe sites; the Open Space Study Update; allocated employment sites and additional secondary employment sites. Seven criteria were used to assess sites including 'Policy alignment' against existing local and national planning policy. The city's urban fringe and allocated employment sites scored poorly due to strong policy constraints. In terms of the potential for any development from the urban fringe, the study concluded a further review of sites would be required to identify the most suitable sites.

City Plan Part 1: Policy Options Papers 2011

Following withdrawal of the Core Strategy, the proposed revocation of the Regional Spatial Strategy and the requirement to set local housing targets, four Policy Options Papers were put forward at this time to consider options for Housing Delivery, Student Housing, Park & Ride and Sustainable Economic Development. In relation to Housing Delivery, the following options were considered:

- 1 – delivery of 9,800 homes all within the built up area of the city.
- 2 – delivery of 11,200 homes the majority of which would be within the built up area of the city, but also including approximately 700 houses delivered on Toads Hole Valley site situated on the urban fringe as part of a mixed use development.
- 3 – delivery of 13,500 homes including development of Toads Hole Valley as above, loss of employment sites to housing and loss of open space to housing.
- 4 – delivery of 15,800 homes including development of Toads Hole Valley as above, greater loss of employment sites and greater loss of open space to housing than option 3.

Options for different locations for development on the urban fringe were not put forward at this stage, as the identification of the Toads Hole Valley site had been informed by previous studies (notably the urban fringe review that formed part of the SHLAA 2009) and was the only strategic site of opportunity.

Sustainability Appraisal Findings

The Sustainability Appraisal concluded that Option 2 was the most sustainable option. Options 3 and 4 were found to have potential for more significant adverse impacts on a range of objectives, some of which were attributable to the amount of development anticipated, but with those of greatest significance attributable to the loss of employment sites and open space. When compared to Option 1, Option 2 had greater potential for more significant adverse impacts on some of the environmental objectives, including biodiversity, the surrounding landscape, transport, water, energy and water. However, not all of these were attributable to development on the urban fringe as some were attributable to the higher amount of development anticipated. When compared to Option 1, Option 2 had greater potential for positive impacts on the social and economic objectives and was found overall to be the preferred option but that a range of mitigation would be required.

At this stage, the Sustainability Appraisal did not carry out a site based assessment to identify constraints or opportunities of alternative urban fringe sites, as it was considered

that this has been adequately considered by the SHLAA process, which had identified Toads Hole Valley as the only site of strategic opportunity within the urban fringe.

Draft City Plan Part 1

The draft City Plan Part 1 included **Policy DA7 Toads Hole Valley**. The strategy for development of this site is to secure a modern, high quality, sustainable mixed use development, to include delivery of a minimum of 700 homes, office floor space, a secondary school, and public open space. The policy includes various criteria which will form the framework for detailed planning guidance.

Options for the policy were not put forward at this stage, as it was deemed that options for development on the urban fringe had been considered at various stages of the Core Strategy/City Plan or through other technical work.

The Proposals Map accompanying the draft City Plan Part 1 included a review of the built up area boundary, to incorporate the Toads Hole Valley site, thus removing the policy constraints as identified in the Urban Fringe Review 2009.

Sustainability Appraisal Findings

The Sustainability Appraisal assessed the emerging policy and made various recommendations including adding requirements around landscaping, reducing heat island effect, reducing surface water run-off, protecting the groundwater resource, and considering traffic impacts on the health of residents.

The Sustainability Appraisal found that the policy had potential for a range of positive impacts including delivery of affordable housing, family size housing, employment opportunities and delivery of open space, and potential for adverse impacts on air quality, local transport issues, the surrounding South Downs National Park, water resources, flood risk and biodiversity. A range of mitigation was suggested.

Urban Fringe Review (2011/12)

This is a review of the earlier (2009) assessment of urban fringe sites. Again, it identified seven sites with some potential for housing. This include the Toads Hole Valley site. The remaining six sites with potential were small sites, with limited potential and not considered able to deliver a strategic opportunity. All sites have policy constraints, as well as other site-based constraints and will be assessed and reviewed during the site allocations process which is likely to include a comprehensive review of the built-up area boundary, under the City Plan Part 2. At this point the SA will conduct a review of the long list of urban fringe sites, in order to aid identification of short-list sites. This review has re-affirmed the fact that Toads Hole Valley was identified through the SHLAA 2009 as the only urban fringe site as having potential for a significant amount of housing, albeit with policy constraints.

Appendix G: The Assessment of Reasonable Alternatives

The aim of this section is to: 1) provide details of the alternative options that have been assessed at the various stages of the plan's preparation, 2) to summarise the sustainability appraisal findings, and 3) to show how in the majority of cases, the final City Plan policy can be linked back to the most sustainable option.

Summary of all stages:

Table G1 below summarises and shows the links between the final City Plan policy and the alternative options which have been assessed throughout the preparation of the plan that have led to policy's development. The option number denotes that which is linked to the final policy. In the majority of cases, this was found to be the most sustainable by the Sustainability Appraisal at that stage of assessment. However, in some cases, the final policy is not linked to an option that was found to be the most sustainable and these are denoted by an asterix. Further explanation for each case where this applies can be found below the table.

Policy Options Stage:

Table G2 provides further details of the various options assessed at Policy Options stage and the Sustainability Appraisal findings.

Revised Preferred Options Stage:

Table G3 provides further details of the various options assessed at Revised Preferred Options stage and the Sustainability Appraisal findings.

Preferred Options stage:

At Preferred Options stage, a number of options were assessed against the SA framework against alternative options and the do nothing or business as usual scenario. The final preferred option, in most cases, was the combination of a number of different options. Therefore, the option number that is relevant to the city plan policy now has not been provided in the Preferred Options column, as there is more than one. Further details on the different options at this stage can be found in Table G4 which details the options assessed.

Options for Growth stage:

Table G5 provides further details on the Options for Growth and the Sustainability Appraisal findings.

Shoreham Harbour:

In addition to the stages outlined below, the policy for Shoreham Harbour has also been subject to two additional stages of options assessment; at Proposed Amendments Paper stage where five options were considered by the Sustainability Appraisal, and at Proposed Submission stage, where three options were considered. The final policy is linked to one of the options that was considered at Proposed Submission stage. More details can be found in Table G6.

Table G1 Summary of options assessed throughout plan preparation and link to final policy

City Plan Policy	Policy Options Papers	Revised Preferred Options	Preferred Options	Options for Growth
DA1	-	DA1 option 1	SS1, R1, CT3	-
DA2	Employment option 4ii	DA2 option 1	SS1, SC3	Growth option A and C
DA3	Employment option 4ii	DA3 option 1	SS1, L3, SC3	Growth option A and C
DA4	Employment option 2i & 4ii	DA4 option 1	SS1, SC3	Growth option A and C
DA5	Employment option 4ii	DA5 option 1	SS1, SC3	Growth option A and C
DA6	Employment option 4ii	DA6 option 1	SS1, SC3	Growth option A and C
DA7	Housing option 2i	SA4 option 3**	UF1 – Alternative Option 1****	Growth option D*****
DA8	Employment option 4ii	DA7 option 2	SH1	Growth option A and C
SA1	-	SA1 option 1	SS1, PRE4, CT4, SR1	-
SA2	Employment option 1i	SA2 option 1	S1	-
SA3	-	SA3 option 1	-	-
SA4	-	SA4 option 1	OS1, UF1	-
SA5	-	SA5 option 1	OS1, OS2	-
SA6	-	SN1 option 1 SN2 option 1	L2, SC1, S2, H5	-
CP1	Housing option 2	CP11 however option superseded by Housing Options Paper.	AH1	-
CP2	Employment options – all	CP16/CP17 option 1	E4, L1	-
CP3	Employment options 3ii, 5i and iii & 6ii	CP16/CP17 options 1, however certain aspects superseded by Employment Options Paper	AH3, E1, E2, E3,	-
CP4	-	CP15 option 1	R1	-
CP5	-	CP18 option 1	CT1,	-
CP6	-	CP19 option 1	CT2	-
CP7	-	CP9 option 1	AH2, L1, L2, L4, SC2, S3, PST2, DC1, DC2	-
CP8	-	CP1 option 1	PRE1	-

CP9	Park and Ride option 2*	CP8 option 1	PST1, PST3, PST4	-
CP10	-	CP5 option 1	-	-
CP11	-	CP10 option 1	PRE3	-
CP12	-	CP2 option 1	UDC1, UDC2, S4	-
CP13	-	CP3 option 1	UDC3, PST5	-
CP14	-	CP13 option 1	-	-
CP15	-	CP17 option 1	UDC4	-
CP16	-	CP6 option 1	OS3, OS4	-
CP17	-	CP7 option 1	H2	-
CP18	-	CP4 option 1	H1, H2, H3, H4	-
CP19	-	CP11 option 1	AH1	-
CP20	-	CP12 options 1 and 3***	AH4	-
CP21	Student Housing options A1 and B3	-	-	-
CP22	-	CP14 option 1	AH1	-

* The final policy CP9 Sustainable Transport did not carry through the preferred approach as recommended by the SA at Policy Options stage, which was option 1: no park and ride. This change in approach was due to comments raised during consultation.

** Although not directly linked to DA7 Toads Hole Valley, SA4 option 3 at Revised Preferred Options stage assessed the potential of development on some sites of urban fringe to accommodate growth, although this was not the preferred option at that time.

*** At Revised Preferred Options stage, the appraisal of the Affordable Housing policy included the assessment of option 3, which required a lower amount of affordable housing on smaller schemes. This was not carried through into the policy at that time due to concerns around viability. However, the current proposed Affordable Housing policy (CP20) now includes a contribution for affordable housing on smaller developments and is based on findings of an updated Affordable Housing Viability Study.

**** At Preferred Options stage, the alternative option to the Urban Fringe policy (UF) that allowed for development on some sites of the urban fringe to accommodate growth was assessed, although the Sustainability Appraisal did not find this to be the most sustainable approach.

***** At Options for Growth stage, the Sustainability Appraisal did not find Option D - limited development on the urban fringe to be the most sustainable approach, however stated that limited development on the urban fringe may be necessary to relieve the carrying capacity of the city.

Table G2 To show the options assessed Policy Options stage, summary of SA findings and link to City Plan policy

City Plan Policy	Policy Options Papers	Summary of findings
DA7 & CP1	<p><u>Housing Delivery Options Paper</u></p> <p>1) 9,800 new homes all within the built up area of the city.</p> <p>2) 11,200 new homes mainly within the built up area of the city, and development on a greenfield site (Toads Hole Valley).</p> <p>3) 13,500 new homes with development on Greenfield site (as option 2), plus total loss of 11.5ha of employment sites and 23ha of open space to housing.</p> <p>4) 15,800 new homes with development on a Greenfield site (as options 2 and 3), plus total loss of 23ha of employment sites and 46ha of open space to housing.</p> <p>Options 2, 3 and 4 all also included mixed use development on some employment sites and some development at Shoreham Harbour.</p>	<p>Overall the SA found option 2 to be the preferred option. Although option 1 resulted in fewer significant negative impacts than other options, it also resulted in fewer significant positive impacts and performed the least well against the housing objective. Options 3 and 4 both performed positively against the housing objective, however these options performed negatively against the employment and economic development objectives, due to the loss of employment sites, on the transport and air quality objectives, and also against the objective relating to preservation of local sites due to the loss of open space. Although positive, the performance of these options against the health objective was also the lowest. Although option 2 had potential for some negative impacts, mainly due to the development of a Greenfield site, the SA considered these could be avoided with mitigation and that overall this option had more potential for significant positive impact than other options, particularly relating to employment, economic development and health. The numerical target for housing was considered achievable given the constraints of the city.</p>
CP2 & CP3 and DA policies	<p><u>Employment Options Paper</u></p> <p>1) <u>Support for the city's office area:</u></p> <p>Option 1(i): to identify central Brighton as the city's primary office location and protect existing office accommodation.</p> <p>Option 1 (ii): to not identify the areas role in the central Brighton special area policy as the city's primary office location.</p> <p>2) <u>Accommodating the need for additional office floorspace:</u></p>	<p>1) Option 1(i) has more potential for positive impacts than option 1(ii) and in particular performed more positively on the employment and economic development objectives and on the objectives relating to air quality, transport and accessibility.</p> <p>2) Option 2(i) has more certainty than the other options as sites for development are named and relative constraints can be assessed and addressed. The naming of sites is</p>

<p>Option 2(i): Accommodate a proportion of the 20,000sqm floorspace through redevelopment and more intensive use of a variety of identified sites in the New England Rd area.</p> <p>Option 2 (ii): Through the identification of New England Road and London Road Area as the broad location suitable for accommodating 20,000sqm of additional office floorspace, with sites to be allocated in City Wide Plan Part 2.</p> <p>Option 2 (iii): Strategic Allocation of two sites within the New England Quarter and London Road Development Area.</p> <p><u>3) The supply of appropriate affordable office-space</u></p> <p>Option 3(i): protection of secondary office accommodation unless redundancy proven with no preference given to alternative uses.</p> <p>Option 3 (ii): protection of secondary office accommodation unless redundancy proven with preference for reuse given to alternative employment uses and/or affordable housing.</p> <p>Option 3 (iii): No general protection of secondary office accommodation.</p> <p><u>4) More mention of strategic employment sites in DA policies:</u></p> <p>Option 4(i): No specific allocation of primary employment sites within Development Area proposals and leave site allocations to City Wide Plan Part 2.</p> <p>Option 4(ii): Specific allocation of primary employment sites and their roles within Development Areas (with sites identified in options paper)</p> <p><u>5) Hierarchy and protection of industrial estates:</u></p> <p>Option 5 (i): Clarify the hierarchy of protection of secondary industrial estates through: (a) identifying and protecting industrial estates and business parks where business, manufacturing and warehouse development will be promoted and loss will be resisted; and (b) identify sites where</p>	<p>considered to provide clarity and more certainty for developers and businesses and may result in development being brought forward more readily than other options having a stronger positive impact than the employment, economic development and health objectives than other options. The SA also considered development of a range of smaller sites to be more viable in current economic conditions.</p> <p>3)Option 3(ii) had greater potential for positive impacts on the objectives relating to employment, economic development, housing and health than the other two options. It offers protection for office accommodation however may also result in gains for affordable housing if redundancy can be proven. The SA suggested that tests for redundancy would need to be clearly set out in the policy.</p> <p>4) Option 4(ii) has greater potential for positive impacts on a range of objectives as well as more certainty than option 4(i) due to sites being named with the relative impacts on site-based objectives able to be assessed. The naming of sites was found to provide certainty for the business community and developers and was found in particular to have potential for positive impact on the objectives relating to employment, economic development and health.</p> <p>5) A combination of options 5(i) and 5(iii) were found to be the preferred approach and to offer the most potential for positive impacts and has more certainty than option 5(ii). This is due to option 5(i) identifying sites in contrast to option 5(ii) where no sites were identified. As well as providing more certainty to the business community, this also allows the relative constraints of the sites to be assessed. In particular, option 5(i) was found to have more potential for significant positive impact than option 5(ii) on the objectives relating to</p>
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	<p>employment-led mixed use development will be permitted in order to secure good quality modern and flexible employment floorspace.</p> <p>Option 5 (ii): To not alter the overall proposed approach set out in the previous version of the plan to protecting industrial sites and premises but leave employment site allocations to City Wide Plan Part 2. (Previous version approach: Employment sites and premises will be safeguarded – no hierarchy and no sites identified).</p> <p>Option 5 (iii): Consider whether further flexibility around employment generating permitted uses should be allowed on the estates/premises outlined in Option 5(ia).</p> <p><u>6) Supply of appropriate business, manufacturing and warehouse accommodation:</u></p> <p>Option 6 (i): For all other “secondary” business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites/premises accommodation will be protected unless redundancy proven.</p> <p>Option 6 (ii): General policy of protection unless redundancy proven but preference for re-use to be given to alternative employment generating uses and affordable housing.</p> <p>Option 6 (iii): No general protection of secondary business, manufacturing and warehouse sites and premises.</p>	<p>employment, economic development and health. Option 5(iii) was found to have no link to the majority of objectives, but was found to have positive impacts on the objectives relating to employment and economic development, as further flexibility around the type of employment uses allowed on site could encourage new business on the site.</p> <p>6) Option 6(ii) was found to have the greatest potential for positive impact, particularly on the objectives for employment, economic development, housing and health, as this policy offered protection for accommodation, but could also lead to gains of affordable housing if redundancy proven. The SA suggested that the tests for redundancy would need to be very specific and clearly set out in the policy.</p>
CP8	<p><u>Park & Ride Options Paper</u></p> <ol style="list-style-type: none"> 1) No park and ride 2) Retention of park and ride and revise sustainable transport policy to include criteria for site selection 3) Retention of park and ride with no change to sustainable transport policy (e.g. no change) 	<p>Overall the SA found option 1 to be the preferred and most viable option as this option had more potential for positive or no impact, although some of the impacts were uncertain. This option was found to avoid a range of site-based adverse impacts that were found to be negative with options 2 and 3. However option 1 was found to have a potential for a negative impact on the economic development objective in contrast to options 2 and 3, where this impact was found to be more positive. Should park and ride be retained, the SA found option 2 to be preferable to option 3 as an amended policy</p>

		which included criteria for site selection may help to avoid adverse site-based impacts.
CP22	<p><u>Student Housing Options Paper</u></p> <p>A1) Adopt an Article 4 Direction to manage HMO accommodation</p> <p>A2) Do not adopt an Article 4 Direction or manage HMO accommodation</p> <p>B1) No policy for new purpose built student accommodation</p> <p>B2) Criteria based policy for new student accommodation</p> <p>B3) Criteria based policy for new student accommodation with potential sites identified</p>	<p>Overall the SA found option A1 and option B3 to be the preferred options. Although the results for options A1 and A2 were fairly mixed, option A1 presents a greater opportunity for positive impacts than option A2 particularly against the objective relating to maintaining local distinctiveness. Both options resulted in mixed impacts against the objectives for housing and economic development.</p> <p>Option B3 had greater potential for positive impacts than both options B1 and B2 and performed positively against most of the objectives. Option B3 provided more certainty than other options mainly due to the identification of sites meaning that the potential site-based impacts could be assessed.</p>

Table G3 To show the options assessed Revised Preferred Options, summary of SA findings and link to City Plan policy

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
DA1	<p>DA1</p> <p>1) To secure a redeveloped state of the art conference centre in a landmark new building to benefit the city and region and to sustain the tourism economy for the next 30 years.</p> <p>2) Refurbishment of the Brighton Centre. Less opportunity for new retail development opportunities.</p> <p>3) Business as usual – relying on a more narrowly defined area in the adopted Brighton Centre SPD.</p>	<p>The SA concluded that options 2 and 3 would not allow for retail development to come forward, would not provide opportunities for townscape or streetscape improvements and would not examine the wider place-making opportunities on surroundings streets or neighbourhood renewal areas. The SA concluded that option 1 was deemed to be the most positive approach.</p>
DA2	<p>DA2</p> <p>1) To facilitate creation of Brighton Marina as a sustainable mixed used district, creating unique high quality marina</p>	<p>The SA concluded that option 2 would lead to uncoordinated and piecemeal development and not address the place-shaping priorities identified as needing to be addressed in</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>environment that will attract residents and visitors and is well connected to the leisure and recreation facility at Black Rock.</p> <p>2) Business as usual</p>	<p>order to ensure a more sustainable mixed-use environment. The SA concluded that option 1 was deemed to be the most positive approach.</p>
DA3	<p>DA3</p> <ol style="list-style-type: none"> 1. To enhance the role of the area as part of the city's academic corridor through supporting proposals which enhance secondary, further and higher education provision in Lewes Road and facilitate improved sustainable transport links, improved air quality and enhanced townscape and public realm. 2. Business as usual 	<p>The SA found option 2 would allow piecemeal development to come forward in an uncoordinated manner which would be contrary to the aims of spatial planning. The SA concluded that option 1 was deemed to be the most positive approach.</p>
DA4	<ol style="list-style-type: none"> 1) Revitalise the London Road retail area and create a major new business quarter for Brighton & Hove consisting of high quality business accommodation connecting London Road with the New England quarter and to maintain and enhance a green gateway to the city at Preston Road West, characterised by a high quality employment-led mixed-use park land environment with local amenities. 2) Business as usual. 3) Deal with the London Road/Preston Road corridor and the Brighton Station/New England areas separately. 	<p>Options 2 and 3 would be more likely to result in a more reactive, uncoordinated approach and would be unlikely to result in improved linkages within the surrounding area and may not allow for employment creation that meets the city's identified priorities and may lose opportunities to improve community safety. The SA concluded that option 1 was deemed to be the most positive approach.</p>
DA5	<p>DA5</p> <ol style="list-style-type: none"> 1) To secure significant improvements to the public realm and townscape making the area more attractive, accessible and safer for residents, employees and visitors and contribute towards increased business investment in the area. 2) To look at a larger geographic are encompassing St James Street and Brighton University site. 3) Business as usual. 	<p>The SA found that option 2 would take the focal point away from Edward Street/Eastern Road, would reduce the emphasis on the need for comprehensive approach to improvements to the public realm, and would not address the poor townscape. The Business as Usual approach found that insufficient development and sites would be generated to warrant inclusion in the Core Strategy. The SA concluded that option 1 was deemed to be the most positive approach.</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
DA6	<p>DA6</p> <ol style="list-style-type: none"> 1) To develop the Hove Station area as an attractive and sustainable employment-led mixed-use are creating a high quality employment environment that will attract investment and new employment opportunities for the city and promote efficient use of land through mixed-use developments. 2) Consider accommodating an additional 20,000 sqm of new office floorspace in the area. 3) Business as usual 	The SA found that options 2 and 3 would be unlikely to lead to improvements in the local environment, may generate increased journeys to/from the area and would not promote the benefits of mixed-use developments. The SA concluded that option 1 was deemed to be the most positive approach.
DA7	A policy for Toads Hole Valley did not exist at this stage.	
DA8	<p>DA7 (Shoreham Harbour)</p> <ol style="list-style-type: none"> 1) Ad-hoc market-led approach. 2) To consider major regeneration at Shoreham Harbour and South Portslade with the aim to create a highly sustainable neighbourhood adhering to the latest standards for sustainable development delivery through an Area Action Plan. 	The SA found that the option 1 would not meet the open space needs of future population, is unlikely to improve transport infrastructure, may result in piecemeal residential development and result in a missed regeneration opportunity for the area, may not tackle local health inequalities nor benefit the wider community. The SA concluded that option 2 was the most positive approach.
City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
SA1	<p>SA1</p> <ol style="list-style-type: none"> 1) To work with public and private sector to continue the on-going regeneration of the seafront in an integrated and coordinated manner to accord with the council's vision for the seafront. Priorities set out for Western Seafront, Central Seafront, East of Palace Pier to the Marine and East of the Marina. 2) Business as usual. 	The SA concluded that the 'business as usual option' was not a sustainable alternative. Whilst the Appraisal recognised that option 1 would provide an integrated policy framework for the seafront the environmental implications of tourism should be addressed.
SA2	SA2	The SA concluded that the 'business as usual option' was not

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>1) To reinforce central Brighton’s role as the city’s vibrant thriving regional centre for shopping, tourism cultural and commercial facilities. Through setting out the approach to the cultural quarter, new retail development, a balanced range of complementary evening and night-time economy uses, mixed use development, safeguarding employment and securing urban realm improvements. To ensure that workspace, particularly that located in North Laine area remains affordable.</p> <p>2) Business as usual.</p>	<p>a sustainable alternative but suggested that there were also uncertainties with option 1 when appraised against the sustainability objectives. These uncertainties related to biodiversity, sustainable urban drainage, water efficiency measures, renewable energy and waste minimisation. Uncertainties should be addressed through other core policies.</p>
SA3	<p>SA3</p> <p>1) To work with public and private sector partners to enhance and regenerate the Valley Gardens area in an integrated manner that reinforces its strategic significance, emphasises its historic and cultural character, reduces the adverse impact of vehicular traffic, improves air quality and creates a continuous green boulevard that reconnects the area to the surrounding urban realm.</p> <p>2) Business as usual.</p>	<p>The SA concluded that the ‘business as usual option’ was not a sustainable alternative. It recognised that as a key gateway to the city, a coordinated approach would be a more sustainable approach to tackle townscape and public realm improvements in the area. However there were uncertainties with the preferred option when considered against certain sustainability objectives. These related to biodiversity, sustainable urban drainage, water efficiency measures, renewable energy and waste minimisation. Uncertainties should be addressed through other core policies.</p>
SA4	<p>SA4</p> <p>1) Land between the built up area boundary and the proposed South Downs National Park boundary will be protected and enhanced and the approach to assessing development proposals will be set out along with priorities for enhancement: green network opportunities; improving sustainable transport access; environmental improvements; protecting groundwater and the wider landscaping role.</p> <p>2) To have no specific policy approach to the urban fringe</p>	<p>The SA concluded that option 1 was the most sustainable, compatible overall with the sustainability objectives and in contrast with alternative options considered the wider landscape role of the urban fringe. The option of some development post 2016 was found to raise too much negativity and uncertainty. The Appraisal did not recommend any changes to the revised preferred option but did suggest ensuring housing and affordable housing in particular is delivered elsewhere in the city.</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>but to rely on a combination of other proposed policies.</p> <p>3) To have a policy which would positively support development on some sites of urban fringe for housing and employment in the period 2016-2026, as part of the long term strategy for accommodating growth.</p> <p>4) Business as usual.</p>	
SA5	<p>SA5</p> <p>1) Following the establishment of the National Park Authority, work in partnership with the National Park Authority and adjoining authorities and landowners to protect and enhance the natural beauty of the South Downs National Park recognising the council priorities for the national park land that falls within the city's administrative area.</p> <p>2) Do nothing</p>	<p>The SA concluded that option 1 is the most sustainable one showing overall compatibility with the sustainability objectives. The Appraisal did not recommend any changes to the preferred option but did suggest ensuring housing and affordable housing in particular is delivered elsewhere in the city.</p> <p>Option 2, do nothing, was not assessed as was not considered to be a reasonable alternative.</p>
SA6	<p>SN1 – Sustainable Neighbourhoods</p> <p>1) Contribute to creating and maintaining sustainable neighbourhoods by working with partners, developers and local communities. The focus will be for viable shopping centres and parades, a good balance and mix of uses in local centres, new/enlarged community facilities provided in areas of need; appropriate mix of size and type of housing; protecting distinctive and important neighbourhood character; opportunities for safer streets; open space, sports and recreation improvements, encouraging a greater range of services and facilities for learning and training; encourage environmental sustainability improvements and encourage community engagement and neighbourhood arts.</p> <p>2) To identify specific neighbourhoods to prioritise</p>	<p>SN1:</p> <p>The SA concluded that option 1 was compatible with the sustainability objectives. The alternative was considered less likely to ensure that all neighbourhoods across the city become sustainable neighbourhoods and the 'business as usual' would not set out an integrated approach to creating and maintaining sustainable neighbourhoods.</p> <p>SN2:</p> <p>The SA concluded that option 1 was compatible with the sustainability objectives and should have positive outcomes against a range of objectives. Mitigation concerns related to any potential new development and how these would impact on biodiversity, sustainable urban drainage, water efficiency measures, renewable energy and waste management. New</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>improvements outlined in Option 1.</p> <p>3) Business as usual.</p> <p>SN2 – Residential Renewal Areas</p> <p>1) Contribute to creating a city of opportunities by ensuring a better quality of life for the most disadvantaged communities by reducing inequalities and addressing the factors which exclude people from full engagement with community life.</p> <p>2) Business as usual.</p>	<p>development should meet the High Level Code for Sustainable Homes/ BREEAM ‘Excellent’ standard. Business as usual was not deemed to be sustainable, as there is no current adopted planning policy relating to residential renewal areas and would lead to direction of improvement in existing designated residential renewal areas only.</p>
City Plan Policy	Revised Preferred Options Policy and options	Summary of SA findings:
CP1	<p>CP11</p> <p>1) Outline the strategy for the planned location of new housing (in accordance with the South East Plan target of 570 homes annually), the mix of housing and to ensure proposals for residential development demonstrate how the additional demand for associated infrastructure and local services will be met.</p>	<p>The SA considered the preferred approach and found that the development of new housing across the city raised several uncertainties and negativities towards some of the sustainability objectives, however to plan for housing needed was positive.</p> <p>No alternative option was put forward, as a “do nothing” option would not be acceptable as government guidance set out specific requirements for the delivery of new housing within local planning authority areas.</p>
CP2	<p>There was no separate policy for promoting sustainable economic development at RPO stage.</p>	
CP3	<p>CP16</p> <p>1) In order to meet the need of the city to 2026, a strategic list of employment sites will be identified, safeguarded and promoted for industrial and business use for office and high tech uses. The New England Quarter will be identified as the location for 20,000 sqm of new office floorspace and the council will promote refurbishment and</p>	<p>CP16</p> <p>Option 2 was found to be less compatible with the sustainability objectives than option 1, would be unnecessary development on greenfield sites and would not make the most of previously developed land. It would also be likely to lead to an increase in private car use, congestion and air pollution. There were uncertainties with option 3 around whether it</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>upgrade of sites and premises through enabling development and encourage the creation of flexible and affordable business space to support the city's key employment sectors.</p> <ol style="list-style-type: none"> 2) Allocate the 20,000 sqm of new office floorspace on the Urban Fringe. 3) Allow more flexibility of employment uses on identified employment sites. 4) Business as usual. <p>CP17</p> <ol style="list-style-type: none"> 1) Other employment sites in the city will be protected and not released to other uses unless the site or premise can be demonstrated to be both redundant and incapable of meeting the needs of alternative modern employment uses. Where release is permitted preference will be given to live/work units or affordable housing. 2) Not to protect the above sites. 3) Not to specify alternative uses if sites are no longer needed. 4) Business as usual. 	<p>might result in the loss of cheap industrial uses and not having defined use classes might result in a lack of balance of types of employment uses. It was recommended option 1 was the preferred option and required a range of mitigation.</p> <p>CP17</p> <p>Option 1 was considered the most sustainable as the alternative of not protecting other employment sites was not recommended because these sites would be needed for sustainable economic development. Not specifying alternative employment uses could lead to inappropriate development. The 'business as usual' option was considered similar in effects to option 1, however offering less flexibility to upgrade sites.</p>
CP4	<p>CP15</p> <ol style="list-style-type: none"> 1) Maintain and enhance current hierarchy of shopping centres. Regional shopping centre will be the focus of any significant future retail development and applications for new retail development within defined shopping centres will be permitted subject to consideration of scale and mix of uses whilst applications for new edge and out of town centre retail development will be required to meet the tests of PPS6. 2) Absorb all the identified retail capacity through existing 	<p>Option 1 was considered to be the most sustainable option, however it was identified that congestion levels are high in central Brighton at the weekends and any increase in retail floorspace is likely to lead to an increase in traffic entering the city. However, as found with the assessment of option 3, by keeping the main shopping area in a central location, sustainable modes of transport will be more prevalent and access easier having wider benefits. The alternative options 2 and 3 were found not to be sustainable due to queries over access and transport and uncertainty over where new centres</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>centres and through creating new centres.</p> <p>3) To absorb new development in edge of centre/out of centre sites.</p> <p>4) Business as Usual.</p>	<p>would be created.</p>
CP5	<p>CP18</p> <p>1) Set out the standards that will be expected of a new visitor attractions and support the upgrading and enhancement of existing visitor facilities. Recognise the role of the South Downs. Promote the provision of arts and creative industries workspaces. Preserve and enhance the historic built environment. Review the Conservation Strategy to provide a framework for future conservation area management.</p> <p>No other options were considered.</p>	<p>Option 1 was found to be compatible with the sustainability objectives. A do nothing option was not considered a reasonable alternative as the currently adopted Local Plan does not reflect the priorities in the 2008 Refreshed Tourism Strategy or reflect good practice guidance on planning for tourism development. The role of Brighton & Hove as a creative industries cluster is also not recognised in the current Local Plan.</p>
CP6	<p>CP19</p> <p>1) Proposals for new major hotel facilities will be assessed in line with the policies in PPS6 and the sequential approach to site selection for new hotel development directed firstly to central Brighton. The policy also sets out how existing guest house and hotel accommodation located within a defined “Hotel Core Zone” will be protected.</p> <p>2) Identify specific sites for new hotel accommodation.</p> <p>3) To not have a Hotel Core Zone” that is used to protect existing accommodation. Instead rely on general policy of protection.</p> <p>4) Business as usual.</p>	<p>The SA found option 2 did not reflect the findings of the Hotel Futures Study that found that there was not a strong need for further hotel developments over and above that which is already planned up to 2016. The business as usual option also did not reflect the findings of the 2007 Hotel Future Study which indicated that the current hotel accommodation zone contained number of anomalies and given limited availability of suitable sites a sequential approach following national guidance may be more appropriate. Removing the Hotel Core Zone could lead to uncertainties and would also not reflect the findings of the Hotel Futures Study which indicated that the Hotel Core Zone provide a clear sign and certainty around protection of existing accommodation and its removal could leave the council expose to residential pressures. Option 1 was therefore seen as the most sustainable.</p>
CP7	CP9	<p>The SA concluded that the business as usual option was not</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<ol style="list-style-type: none"> 1) Require all new development to be accompanied by the necessary provision of social and physical infrastructure. Any infrastructure required before the development is occupied should be provided on time. 2) Business as usual. 	<p>deemed to be the most sustainable and would be contrary to government guidance which requires that the Local Development Framework contain an up to date policy regarding developer contributions and further details of its application set out in a Supplementary Planning Document. Overall option 1 was deemed compatible with the sustainability objectives.</p>
CP8	<p>CP1</p> <ol style="list-style-type: none"> 1) To require all development to deliver levels of building sustainability in advance of those set out nationally in order to avoid expansion of the city’s ecological footprint and to mitigate against climate change. 2) Business as usual. 	<p>The SA concluded that the alternative business as usual option was not the most sustainable as relying on national/ regional targets could risk standards being applied that do not adequately reflect the distinctive local environmental circumstances. Option 1 was found to be compatible but it was indicated in the Appraisal that the potential cost of building to high sustainability standards may conflict with the viability of providing affordable housing.</p>
CP9	<p>CP8</p> <ol style="list-style-type: none"> 1) Outline the sustainable transport priorities for the city to ensure that future development in the city does not increase the pressure on the city’s road network and encourages a shift to non car modes of transport. Ensure new development is located in areas with good transport links and responds to the demand for travel they create. 2) To disperse development across the city rather than concentrate it on sustainable transport corridors to reduce levels of congestion. 3) Business as usual. 	<p>The SA concluded that the dispersal option was unlikely to reduce congestion and improve air quality. The SA noted that option 2 also goes against the findings of the assessment of the “Approaches to Growth” which found the accessibility approach to be generally positive. Option 1 was found to be the most compatible with the sustainability objectives.</p>
CP10	<p>CP5</p> <ol style="list-style-type: none"> 1) Conserve and enhance biodiversity and promote improved access to green spaces through the establishment of a green network which will enable a 	<p>The SA concluded that the business as usual option was not deemed to be the most sustainable as it would not allow for the concept of a green network across the city to be introduced or reflect the local biodiversity context relevant to</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>strategic approach to nature conservation enhancement.</p> <p>2) Business as usual.</p>	<p>the city. Option 1 was overall found to be compatible with the sustainability objectives.</p>
CP11	<p>CP10</p> <p>1) Set out the approach to managing flood risk to accord with the recommendations of the SFRA and PPS25 and ensure development incorporates where appropriate flood defences and suitable arrangements for sustainable surface water drainage.</p> <p>2) Business as usual.</p>	<p>The SA concluded the business as usual approach would not reflect the new guidance or requirements of national planning guidance on Flood Risk or reflect the recommendations of the Strategic Flood Risk Assessment (SFRA). The SA found Option 1 to be informed by the findings of the SFRA which recommends a number of measures of mitigation should development be located in an area that is designated as medium or high risk and to be the most sustainable.</p>
CP12	<p>CP2</p> <p>1) Set out the general strategic design criteria expected of new development and to require the highest standards of design. Prepare city-wide urban design framework which will identify that have potential for taller developments.</p> <p>2) Business as usual.</p> <p>3) Not to identify areas suitable for tall buildings either: treat all planning applications on their merit or reject all proposal over 6 storeys.</p>	<p>The SA concluded that option 3 would create many uncertainties and did not reflect the council's adopted Tall Building Guidance that had considered potential locations on sustainable transport nodes or for their lack of visual intrusion. The do nothing option would not adequately capture the particular local context for urban design or reflect area specific opportunities for tall buildings. It was therefore concluded that option 1 was the most sustainable and compatible overall with the sustainability objectives.</p>
CP13	<p>CP3</p> <p>1) To comprehensively improve the quality, legibility and accessibility of the city's public urban realm. Proposals will be expected to achieve consistent aims and standards and make an appropriate contribution to achieving these requirements.</p> <p>2) Business as usual.</p>	<p>The SA concluded that the business as usual option was not deemed to be the most sustainable as it risks losing opportunities to improve the public realm and to take forward the recommendations from the Public Life and Public Spaces study. Option 1 was compatible with sustainability objectives but it was suggested that the option includes the planting of street trees and other suitable street planting as part of improving the public realm.</p>
CP14	CP13	The SA concluded that option 1 would be compatible with the

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<ol style="list-style-type: none"> 1) Outline the criteria for assessing the higher residential developments and in order to make the full and effective use of land available set a minimum density of 50 dph city wide and 100 dph within Development Areas. 2) To set a lower minimum density requirement across the city including the Development areas to the PPS3 minimum of 30 dph. 3) Business as usual. 	<p>sustainability objectives and would make the best use of previously developed land and potentially prevent the need to develop on greenfield sites around the city as well as providing specific targets relating to residential density in contrast to the 'business as usual' option; although the impacts were considered to be the same. The lower density option raised uncertainty as to whether the city's housing target could be met and would be a less efficient use of brownfield sites.</p>
CP15	<p>There was no separate policy for Heritage at RPO stage. See CP5.</p>	
CP16	<p>CP6</p> <ol style="list-style-type: none"> 1) Safeguard, enhance and promote access to the city's green and open spaces and beaches and promote active living. Local open space standards for quantity, quality and accessibility will be set out and development will be expected to contribute to the provision of and improve the quality, quantity and accessibility of open space. 2) Business as usual. 	<p>The SA concluded that a business as usual option would not be the most sustainable as it would be contrary to national guidance which seeks to ensure that open space is retained/ provided and expects local authorities to undertake open space, sports and recreation facility assessment and to develop local standards and policies. Option 1 was found to be overall compatible with the sustainability objectives.</p>
CP17	<p>CP7</p> <ol style="list-style-type: none"> 1) Safeguard, enhance and promote access to the city's sports and recreation facilities. 2) Business as usual. 	<p>The SA concluded that a business as usual option would not be the most sustainable as it would be contrary to national guidance which seeks to ensure that sport and recreation facilities are retained/ provided and expects local authorities to undertake open space, sports and recreation facility assessment and to develop local standards and policies. Option 1 was found to be overall compatible with the sustainability objectives.</p>
CP18	<p>CP4</p> <ol style="list-style-type: none"> 1) Ensure developments and programmes and strategies 	<p>The SA concluded that the business as usual option was not deemed to be the most sustainable as the Healthy City</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	<p>are tested to ensure they reduce adverse impacts on health, maximise positive impact on health and promote health, safety and active living for all age groups. Safeguard allotments and encourage joint working with health providers.</p> <p>2) Business as usual.</p>	<p>agenda is important for the city and is a key theme of the Sustainable Community Strategy. Option 1 was found to be compatible overall with the sustainability objectives.</p>
CP19	<p>There was no separate policy for housing mix at RPO stage. See CP1 which incorporated housing mix.</p>	
CP20	<p>CP12</p> <ol style="list-style-type: none"> 1) To set out a plan wide target to secure an annual average of 230 units of affordable housing over the plan period from all mechanisms. Informed by an updated Viability Study, the council will negotiate with developers to secure up to a 40% element of affordable housing on all larger development sites with criteria set out to assess the proportion and type of affordable housing proposed informed by up to date assessments of local housing needs and site/neighbourhood characteristics. 2) To have a higher percentage target of affordable housing provision than the current Local Plan 40% for sites capable of delivering 10 units or more. 3) To include a requirement for affordable housing for sites less than 10 units in size. 4) Business as usual. 	<p>The SA concluded that option 2 would not be a viable option as the 2007 Affordable Housing Viability Study found that this would stretch viability too far and may therefore jeopardise development. Whilst the option of a 'sliding scale' of contributions to affordable housing was recommended by the 2007 Viability Study, the Strategic Housing Market Assessment (2008) suggested that the cost and resource implications of negotiations would need to be weighed against the financial contributions to affordable housing of this approach. Therefore the appraisal concluded that option 1 would be the most sustainable as this would reflect the nature of housing sites available for housing in the city. Uncertainty was expressed as to whether the cost of providing affordable housing may conflict with the cost of providing sustainable homes.</p>
CP21	<p>There was no policy for student housing at RPO stage.</p>	
CP22	<p>CP14</p> <ol style="list-style-type: none"> 1) Provision will be made to meet the local need for gypsy and traveller caravan pitches in accordance with the South East Plan targets. Set out the relevant planning considerations and criteria for the location of gypsy and traveller sites which may be used to guide the formal 	<p>The SA considered a 'business as usual' option but recognised that due to government guidance it was not a viable option. Option 1 was found to be compatible with sustainability objectives.</p>

City Plan Policy	Revised Preferred Options Policy and Options	Summary of findings
	consideration and allocation of sites. 2) Business as usual.	

Table G4 To show the options assessed at Preferred Options, summary of SA findings and link to City Plan policy

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
<p>Promoting Resource Efficiency: PRE1 – to require developments to achieve highest standards of sustainable building design. PRE2 – produce SPD specifying minimum performance targets. PRE3 – to set out how flood risk will be managed. PRE4 – take forward recommendations relating to maintaining the existing defended coastline. Do nothing</p>	<p>Two recommendations emerged from the Sustainability Appraisal process: given their distinct nature, issues of flood risk and coastline defence were to be considered separately and the issue of adaptability to climate change was lacking in the definition of ‘environmental and ecological properties’ in Preferred Option 1. Preferred Options 3 and 4 emerged in response to the first recommendation and the incorporation of ‘adaptability to climate change’ was added to the definition of environmental and ecological properties in Preferred Option 1, in response to the second recommendation. The SA concluded that the preferred options would be the most sustainable option.</p>	<p>CP8 CP11 SA1</p>
<p>Urban Design & Conservation UDC1 – To raise the density of development in the built-up area and make most efficient use of areas with potential for tall buildings. UDC2 – Produce an urban design framework to set out areas to be preserved and those suitable for enhancement. UDC3 – to improve quality, legibility and accessibility of public realm. UDC4 – to preserve and enhance heritage assets. Do nothing</p>	<p>The SA concluded that no changes were necessary to the options and that the ‘business as usual’ option was not a sustainable alternative. It suggested some mitigation measures to Options 1 and 2 to ensure that new development is environmentally sustainable. The Appraisal also suggested that development in the identified higher-density areas should be subject to a Health Impact Assessment. With regard to Option 4, the Appraisal notes the need to balance the issues of preserving the visual quality of the historic built environment and promoting micro-generation technologies etc.</p>	<p>CP12 CP13 CP15</p>
<p>Countryside & Open Space OS1 – to retain beauty and character of the countryside. OS2 – to conserve & enhance AONB/National Park. OS3 – to facilitate and improve access to various types of open space for variety of purposes. OS4 – to ensure future developments enhance and</p>	<p>The SA concluded that the ‘business as usual’ option was not a sustainable alternative. The SA concluded that no significant changes were necessary to the options. A minor amendment was suggested in respect of the first option relating to the addition of a reference to sustainable public transport.</p>	<p>SA4 SA5 CP16</p>

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
contribute towards provision of additional open space. Do nothing		
<p>Housing & Affordability</p> <p>AH1 – Plan to provide new housing in accordance with South East Plan target.</p> <p>AH2 – to proactively secure contributions from development for local services and facilities.</p> <p>AH3 – to help secure affordable housing by allowing greater flexibility on some employment sites.</p> <p>AH4 – to increase the proportion of affordable housing required from new development.</p> <p>Do nothing</p>	<p>The Sustainability Appraisal considered Preferred Options 1, 3 and 4, together with a ‘business as usual’ option. It did not recommend any changes to the options and concluded that the ‘business as usual’ option was not a sustainable alternative. Preferred Option 2 was appraised as part of the preferred options on Developer Contributions in Part Six of this document. In terms of Preferred Option 1, the Appraisal noted that until the final housing target for Brighton & Hove is known, it is not possible to measure the full effects of the target in terms of resource use, impacts on the city’s ecological footprint and any other potentially detrimental impacts of additional development. In respect of Preferred Option 3, the Appraisal noted that overall this option is likely to secure positive sustainability impacts. It suggests that the policy should indicate the type and the location of employment sites that would be suitable for some enabling housing development.</p> <p>In respect of Preferred Option 4, the Appraisal noted that the scale of housing need is such that new delivery and conversions are unlikely to meet levels of need and this may result in growing levels of unmet need each year. It also noted that an increase in the percentage of affordable housing may have economic/viability implications for the development industry. The Appraisal recommends that the final policy should state clearly the percentage of affordable housing that will be required in new housing developments.</p>	<p>CP1 CP19 CP22 CP7 CP3 CP20</p>
<p>Employment</p> <p>E1 – to protect existing office and industrial sites, but allow enabling development on some sites</p>	<p>The Sustainability Appraisal considered the preferred options, together with the alternative option and a ‘business as usual’ option, and concluded that no changes were needed to the</p>	<p>CP3 CP2</p>

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
<p>E2 – allocate sites capable of generating an additional 20,000m² of office floorspace</p> <p>E3 – to safeguard other non-allocated sites</p> <p>E4 – encourage the creation of flexible, affordable business space</p> <p>Alternative Option – provide additional business stock on northern fringes of the city</p> <p>Do nothing</p>	<p>Preferred Options and that these were more sustainable than the other alternatives. It was considered that more detail on identified office sites to meet future office needs was required before the precise effects of the policy can be determined. Such more detailed assessment of sites will take place through the Site Allocations DPD preparation process. The Appraisal recommended taking account of the Urban Characterisation Study when intensification of existing industrial estates is being considered and that mitigation measures may be required with any intensification of sites.</p>	
<p>Retail</p> <p>R1 – to direct all new retail development to existing defined centres and require edge or out of centre schemes to carry out impact assessments.</p> <p>Do nothing</p>	<p>The Sustainability Appraisal considered the preferred option, together with the ‘business as usual’ option. It concluded that no changes are necessary, and that the ‘business as usual’ option is not a sustainable alternative. It suggested that some mitigation measures be taken to the preferred option to ensure that new development is environmentally sustainable; and that the results of the Urban Characterisation Study should be used to determine areas that will be able to support further development.</p>	<p>CP4 DA1</p>
<p>Culture & tourism</p> <p>CT1 – emphasise the importance of improving the quality of existing cultural and tourist offer.</p> <p>CT2 – to set the strategy for protection of hotel accommodation and approach towards new hotel accommodation.</p> <p>CT3 – to plan for replacement of the Brighton Centre.</p> <p>CT4 – to have a flexible approach to the Cultural Quarter to be able to respond to economic and diverse needs of the area.</p>	<p>The Sustainability Appraisal considered the preferred options, together with a ‘business as usual’ option, and concluded that a change was needed to two options and that the ‘business as usual’ option is not a sustainable alternative. It suggested that Preferred Option 1 be more specific as to the requirements of high environmental standards. It suggested that the link with the preferred environmental sustainability options should be addressed through the proposed Supplementary Planning Document on Sustainable Building Design. It further suggested that the policy approach for the Brighton Centre be reworded to</p>	<p>CP5 CP6 DA1 SA1</p>

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
Do nothing	include the requirement to 'incorporate the highest standard of environmental design'. The Appraisal highlighted that whilst tourism is a significant benefit to the local economy, the environmental implications need to be addressed, in particular concerning resource consumption.	
<p>Learning</p> <p>L1 – to require major development to provide training opportunities for local people</p> <p>L2 – for existing education establishments to provide a greater range of services and facilities</p> <p>L3 – promote expansion of higher education through the development of an academic corridor</p> <p>L4 – to ensure that appropriate education facilities are in place to serve new development</p> <p>Do nothing</p> <p>Alternatives to L2: to allow unlimited expansion of the universities; or allow no expansion at all.</p>	<p>The Sustainability Appraisal considered the preferred options, together with the alternatives and a 'do nothing' option. Preferred Options 1 and 2 have either no significant effect or a positive impact, largely through reducing the need to travel and increasing local skills.</p> <p>The potential negative effects of Preferred Option 3 need to be reduced or mitigated through general policies, which should apply to all development. The Appraisal highlighted two particular issues that need addressing:</p> <ul style="list-style-type: none"> • Air Quality Management issues on Lewes Road related to traffic congestion. This will be dealt with by other policies in the LDF and the Local Transport Plan. • The expansion of the universities could result in an increased demand for housing. To overcome this, Preferred Option 3 has been amended to require any expansion of the universities to be in conjunction with the provision of further student housing. <p>The preferred options represent the best sustainable options overall compared to alternative options. Preferred Option 4 was appraised as part of the Developer Contributions preferred option.</p>	CP2 CP7 SA6 DA3
<p>Strengthening Communities</p> <p>SC1 – to support implementation of priorities outlined in</p>	The Sustainability Appraisal considered preferred options 1, 2 and 3, together with a 'business as usual' option, and concluded	SA6 CP7

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
<p>Neighbourhood Action Plans SC2 – to seek developer contributions for community facilities where there is an identified shortfall SC3 – identify key sites for future Area Action Plans Do nothing</p>	<p>that no changes were necessary to the options and that the ‘business as usual’ option is not a sustainable alternative. It suggested some mitigation measures to option 3; that social issues raised in consultation should be considered to help determine if the Neighbourhood Renewal Areas could cope with an increase in residential accommodation and noted that the concerns of particular Communities of Interest raised during community involvement have not been covered by these preferred options.</p>	<p>DA policies</p>
<p>Reducing Crime and Improving Safety S1 – to help deliver a safer city, particularly at night in areas with established night-time uses S2 – to include a policy for identified neighbourhood renewal areas which supports community safety. S3 – require planning contributions to go towards community safety improvements. S4 – to require secured by design from appropriate development proposals. Alternative Option to S1 – to disperse late night uses to a wider area Do nothing</p>	<p>The Sustainability Appraisal considered Preferred Option 1 against the alternative option of allowing late night uses across a wider area. It was concluded that the alternative option would not be sustainable due the wider impact on health, safety and the amenities of a residents citywide. There may also be an impact on local distinctiveness. The Sustainability Appraisal considered preferred options 1, 2 and 4 against a ‘do nothing’ approach and concluded that such an approach is not sustainable. Preferred Option 3 was appraised as part of the preferred options on Developer Contributions.</p>	<p>SA2 SA6 CP7 CP12</p>
<p>Improving Health & Well-being H1 – to require Health Impact Assessment from major developments H2 – to support provision or expansion of community, health and sports and recreation facilities H3 – to encourage design that promotes health, safety and active living for all groups H4 – to retain allotments and small scale agriculture in appropriate areas H5 – to activity support provision of or access to</p>	<p>The Sustainability Appraisal considered the preferred options together with a ‘business as usual’ option, and concluded that no changes are necessary to options 1 and 2 and that the ‘business as usual’ option is not a sustainable alternative. The Appraisal recommended one change to Preferred Option 4 to include reference to ‘locally produced’ food options. The Appraisal suggested that Preferred Option 5 could be combined with Preferred Option 2 by reference to deprived areas. This suggestion was not incorporated in view of the importance of narrowing the clear health gap that exists between the identified</p>	<p>CP18 SA6</p>

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
community facilities and access to open space in identified deprived areas. Do nothing	deprived areas and the rest of the city; this is considered to warrant a separate policy option.	
Promoting Sustainable Transport PST1 – to direct development to areas of the city which have good public transport and ensure development is located where improvements to sustainable transport can take place PST2 – development should contribute towards provision and maintenance of sustainable transport facilities PST3 – to require transport assessments from developers to assess impacts PST4 – to prioritise access in the city centre for pedestrians and public transport PST5 – to improve the public realm Alternative option – to not constrain private motor vehicles to allow access throughout the city however this considered to be the “do nothing” approach	The Sustainability Appraisal considered the five preferred options together with a ‘do nothing’ or ‘business as usual’ option. (Preferred Option 2 was appraised as part of the Developer Contributions preferred options. The Appraisal found that the ‘do nothing’ option is not a sustainable alternative. It recommended a minor change to Preferred Option 5 to include reference to “sustainable” materials and to refer to “best” practice rather than good practice. The Appraisal recommended a number of environmental mitigation measures to Preferred Option 1 and for Preferred Option 4, it recommended that Health Impact Assessments should be carried out on any Park and Ride and Rail Transfer Station schemes.	DA policies CP9 CP7 CP13
Seafront Regeneration SR1 – to support the ongoing regeneration of the seafront south of the A259 from the Marina to Hove lagoon which encourages development of key seafront sites. Do nothing	The Sustainability Appraisal considered the preferred option, together with the Culture and Tourism preferred options and a ‘business as usual’ option, and concluded that no change was needed to the option and that the ‘business as usual’ option is not a sustainable alternative.	SA1
Shoreham Harbour SH1 – to support the long term regeneration of the harbour area to provide jobs, homes and leisure facilities. Do nothing	The Sustainability Appraisal considered the preferred option together with a ‘business as usual’ option and noted that the two do not differ greatly. In view of the fact that the long term effects, and the deliverability, of regenerating the Harbour are currently unknown, the Appraisal recommends a change of policy wording to state that the Core Strategy will include:	DA8

Preferred Options Policy and Options	Summary of SA findings	City Plan Policy of relevance
	<p>“A policy that recognises the long term regeneration of Shoreham Harbour could be viable to providing a significant amount of new jobs, homes and leisure facilities as long as the social, economic and environmental deliverability can be shown”. In response, this proposed change was not accepted as the wording is not considered to be pro-active or supportive enough, given the findings of community involvement, and does not accord as well with the Adur District Council Preferred Options</p>	
<p>The Urban Fringe UF1 – to support a holistic and pro-active approach to change within and management of the urban fringe. Alternative Option 1 – To have no specific policy approach but rely on other policies Alternative Option 2 – To have a policy that would positively support development on some sites Do nothing</p>	<p>The Sustainability Appraisal considered the preferred option together with the two alternative options and a ‘business as usual’ option. It concludes that the preferred option is the most sustainable one, particularly in view of its consideration of the wider landscape role of the urban fringe as a whole. The Appraisal does not recommend any changes to the preferred option but does suggest various mitigation measures with regard to the protection of natural resources, sustainable transport and community safety.</p>	SA4
<p>Developer Contributions DC1 – to consider the identified priorities from the other preferred options with regard to where contributions should be sought. DC2 – to include a policy which broadens the Local Plan policies for infrastructure and developer contributions Do nothing</p>	<p>The Sustainability Appraisal considered the preferred options together with a ‘business as usual’ option. It recommended no changes to the preferred options and considered such options to be necessary and essential. The ‘business as usual’ option was not considered to be a sustainable alternative.</p>	CP7

Table G5 To show the options assessed at the Approaches to Growth stage and summary of SA findings

Nb: the approaches to growth stage helped to form the Spatial Strategy, Preferred Option SS1, which identified ten areas as having potential for significant mixed-use, high density development. These were then continued in the various stages of the City Plan as both the Spatial Strategy and Development Area policies.

Approach to Growth	Summary of SA findings
<p>A – accessibility led approach B – regeneration-led approach C – urban character-led approach D – limited development on the urban fringe E – identification of large strategic development sites Business as usual approach – e.g. continue with approach set out in Local Plan.</p>	<p>Approach E – identification of large strategic sites was rejected and therefore not appraised as an option. This was due to doubts over deliverability of such an approach at the time. In addition, it was considered that the city only has a small number of such sites and therefore there would be limited potential in the approach.</p> <p>The SA considered approaches A-D and the business as usual approach. The main findings of the appraisal were:</p> <ul style="list-style-type: none"> • None of the approaches should be applied in isolation. • Approach C should form part of the preferred option and should take into account the Open Space Study findings. • Approach A had the greatest potential for reducing car use but could have wider negative impacts if applied in isolation. • The identified deprived areas (approach B) should be included in the preferred option, but not for significant higher-density housing until social and employment issues had been addressed. • It may be necessary to allow limited development on the urban fringe to relieve the carrying capacity of city. • Protection of natural resources and environmental enhancement should be an integral part of the preferred approach. • The business as usual approach is not a sustainable one in the longer term.

Table G6 to show the various options considered for Shoreham Harbour

It should be noted that the options considered at Proposed Amendments Paper, were new options to be considered due to the location being identified as a Growth Point and Strategic Development Area in the South East Plan capable of delivering 10,00 homes. Following removal of Growth Point status, a different set of options for Shoreham Harbour were put forward in Proposed Submission.

Options considered:	Summary of SA findings
<p>Proposed Amendments Paper options:</p> <ul style="list-style-type: none"> 1 – Employment led regeneration with numbers of housing and jobs to be agreed 2 – 5,500 dwellings 3 – 8,000 to 8,700 dwellings 4 – 10,000 dwellings 5 – no development, reliance on windfall 	<p>Option 2, which suggests significant levels of development, but not enough to generate critical infrastructure, such as flood and transport, was found to be unviable and performed negatively against all objectives.</p> <p>Option 5 was found to perform negatively against most objectives, as may not deliver affordable housing, would be unlikely to generate additional infrastructure and would miss the regeneration potential of the port.</p> <p>Options 1, 3 and 4 had more potential for positive impacts particularly amongst the more social and economic objectives, assuming that levels of development were sufficient to deliver critical infrastructure, however were found to have more scope for more significant negative impacts against the environmental objectives, with negative impacts increasingly significant with option 4. Overall the SA found there to be a critical point at which development becomes feasible and viable due to provision of infrastructure, however development shouldn't be significantly above this level to minimise the potential for environmental impacts.</p>
<p>Proposed Submission options:</p> <ul style="list-style-type: none"> 1 – comprehensive large scale redevelopment, with land reclamation from the sea 2 – comprehensive large scale redevelopment, without reclamation from the sea 3 – smaller scale redevelopment without reclamation from the sea 	<p>The SA found option 1 likely to deliver greater amounts of housing and other development than options 2 and 3, but had much greater potential for significant environmental impacts due to land reclamation. There were also concerns over viability of this option.</p> <p>The SA found option 2 to still have significant potential for positive social and economic impacts, but again found the adverse environmental impacts to also be of significance. Again, studies indicate that the level of development associated with this option may not be enough to generate the significant level of infrastructure required.</p> <p>The SA found option 3 likely to achieve positive social and economic impacts, but that these would not be as significant as the other options. Again, adverse environmental impacts were considered likely, although not as significant as other options.</p>

	<p>The SA stated that without the completion of studies, and information on the amounts of development to be delivered, that it was difficult to complete an accurate assessment, however stated that an option that did not include reclamation from the sea would be more environmental preferable.</p>
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**Brighton & Hove
City Council**