

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

Why you should use this part of the toolkit

The following table sets out a checklist of the key requirements for the content and form of local plans as set out in the National Planning Policy Framework (NPPF). Guidance to supplement the NPPF is set out within [National Planning Practice Guidance](#), which is regularly updated by the Government. You should review relevant sections of the National Planning Practice Guidance and consider any implications for your policies.

This part of the Toolkit will assist by informing all plan making stages, including any visioning and scoping exercises seeking to ascertain what the plan should cover. It should be applied before consultation or publication of a local plan update. This will help to ensure that you have considered all of the key plan-making requirements in preparing your plan in accordance with the NPPF.

This part of the toolkit deals only with the local plan content requirements specified in the NPPF. Toolkit Part 1 provides more detail on carrying out a review of the need to update policies within your plan. Toolkit Part 3 sets out the process requirements for local plan preparation as set out in legislation and the NPPF. Soundness and Plan Quality issues are dealt with in Toolkit Part 4.

How to use this part of the toolkit

You can use column C in the table to record the results of your assessment against the checklist for the following plan making stages:

- Local Plan Review:** The toolkit can be used to inform the decision on whether or not your local plan policies need to be updated. In this case:
- Ask yourself whether the development plan for your area (which may comprise more than one development plan document or include a spatial development strategy and/or neighbourhood plans) still meets current NPPF requirements.
 - Identify which policy and document addresses the requirement in column C or identify why it is not relevant.

If your plan was adopted under the NPPF 2012 you might find the following quick reference colour codes helpful to identify new or revised NPPF requirements since the adoption of your plan:

Key:

New plan-making requirement of the NPPF 2019 not contained within the previous 2012 version
Revised plan-making requirement of the NPPF, containing some changes from the 2012 version
Requirement of the NPPF which has not changed from the 2012 version in relation to plan-making

Scoping your policies update: The checklist can also be used to determine the scope of your local plan policies update and ensure that content requirements are addressed. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/ planning context of your local authority area(s); and then
- consider whether your local plan policies update will need to address these content requirements or identify whether they are contained in other documents that form the development plan in your area.

Assessing your draft policies update: The checklist can also be used to ensure that your emerging draft policies update is adequately addressing content requirements of national planning policy. You can work through each section of the table to determine:

- whether the provision is relevant to your local plan policies update/planning context of your local authority area(s); and then
- if it is, whether your draft local plan policies update addresses these content requirements (or identify whether they are contained in other documents that form part of the development plan in your area).

How to use the results of this part of the toolkit

This checklist is to help you review your policies and/or develop an update to these where required. There is no requirement to publish or submit this table to the Planning Inspectorate. However, you may find it (or some elements) helpful to assist you in demonstrating how the policies update does/does not accord with the NPPF.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<i>General Requirements</i>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	Not applicable to Brighton & Hove.
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	<p>The council is confident that CPP2 will contribute to the achievement of sustainable development and will support and promote the three overarching objectives – economic, social and environmental – which are defined in the NPPF.</p> <p>CPP2 is a Part 2 plan which includes policies and site allocations to complement the strategic policy framework and support the strategic objectives already established in CPP1.</p> <p>The Plan has been subject to a Sustainability Appraisal (SA) incorporating the statutory requirements of the Strategic Environmental Assessment (SEA) Directive. The SA process ensures the plan promotes sustainable development and ensures it is an appropriate strategy when assessed against alternative options.</p> <p>The SA process has been integral to the development of policies in CPP2 and has followed the stages set out in the Regulations and NPPG guidance.</p> <ul style="list-style-type: none"> The first stage (Stage A) involved preparation of a SA Scoping Report (June 2016) which was published for consultation alongside the CPP2 Scoping Paper. The SA Scoping report established the SA framework including 19 broad SA objectives. The objectives were

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			<p>further developed with two sets of decision-making criteria developed; one for appraising the options and policies of CPP2; and one for carrying out the site appraisals.</p> <ul style="list-style-type: none"> • At the draft CPP2 (Reg 18) stage, the council published a SA report (including a non-technical summary) (June 2018) to accompany the Draft CPP2 consultation. The report sets out the findings of the assessments against the SA Framework of: the strategic objectives set out in CPP1, the alternative options for developing the policies, including the option of “no policy”, the draft policies themselves, and the sites being allocated including some sites which were then later rejected. • At the Proposed Submission (Reg 19) stage, the council published an updated SA report (including a non-technical summary) (April 2020). The updated SA re-assessed all revised policies focusing particularly on any amendments made between draft and Proposed Submission stages. In addition, the allocated sites were re-assessed taking into consideration any new evidence or information, and any omission sites put forward in response to the Reg 18 consultation were also assessed. • Following Regulation 19 consultation, the council undertook a screening exercise of all proposed changes to policies arising from the consultation and from recent national changes to the Use Classes Order (UCO) to determine whether these changes were significant. Full SA assessment of policies with significant changes was then undertaken to show the likely impacts of the amended policies. A SA Addendum forms part of the submission documents and will be consulted upon alongside any proposed modifications following the Examination.

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			<p>Overall, the SA has found that the plan will contribute towards achieving social and economic objectives through policies which support housing delivery, deliver the wider determinants of health, improve access to services, support community safety, promote equalities and support economic growth, whilst providing a policy framework that achieves environmental objectives through avoiding, reducing and addressing the likelihood of adverse environmental effects resulting from planned development.</p>
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	<p>NPPF para 11 requires that:</p> <ul style="list-style-type: none"> a) Plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: <ul style="list-style-type: none"> i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. <p>CPP1 sets out the long term vision, strategic objectives and strategic planning policy framework to guide new development across the city to 2030. CPP1 sets the overall amounts of new development to be planned for (e.g. housing, employment and retail) and the broad locations (e.g. 8</p>

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			<p>designated ‘Development Areas’) where new development will take place.</p> <p>The role of the CPP2 is to support the implementation and delivery of CPP1. This includes allocating sufficient sites to ensure delivery of the minimum housing requirements set out in CPP1 Policy CP1 Housing Delivery and employment floorspace (B1-B8) requirements in CPP1 Policy CP3 Employment Land.</p> <p>CPP2 allocates seven strategic mixed use development sites (Policies SSA1-SSA7), 39 housing & mixed use sites within the existing built-up area (Policy H1 Housing Sites and Mixed Use Sites), 16 urban fringe housing sites (Policy H2 Housing Sites – Urban Fringe), 3 sites for Purpose Built Student Accommodation (Policy H3 Purpose Built Student Accommodation) and an additional employment opportunity site (Policy E1 Opportunity Site for Business and Warehouse Uses).</p> <p>CPP2 includes a specific strategic area policy for Benfield Valley (Policy SA7) which aims to facilitate the positive and ongoing management and maintenance of its open spaces, wildlife habitats and heritage assets, and to improve public access and connectivity with adjoining urban areas and the South Downs National Park.</p> <p>CPP2 also includes development management policies which plan positively and flexibly to support and promote specific types of development in the city, e.g older persons housing (Policy DM4), built to rent housing (Policy DM6), Purpose Built Student Accommodation</p>

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			(Policy DM8), new business floorspace (Policy DM11), and hotels (Policy DM17).
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	As a Part 2 plan, the role of CPP2 is to support the implementation and delivery of CPP1 and to complement its already established strategic policy framework. As stated above, CPP2 does this by identifying and allocating additional development sites and by setting out detailed development management policies to assist in the determination of planning applications.
5.	Plans should be: Aspirational and deliverable Contain clear and unambiguous policies Accessible through the use of digital tools Serve a clear purpose avoiding duplication	NPPF Para 16	The role of CPP2 is to support the implementation of the vision and spatial strategy set out in the City Plan Part 1. Policies are aspirational and positively worded. The Plan is supported by a proportionate evidence base including establishing where local issues need to be addressed and to support the council priorities. Deliverability of site allocations have been considered through the Site Assessment process (as set out in the Site Allocations Topic Paper). Consultation at the Regulation 18 (Draft City Plan Part 2) and at the Regulation 19 (Proposed Submission City Plan Part 2) have enabled the policy wording to be tested for clarity and to ensure that they do not duplicate the provision in the NPPF or CPP1. The City Plan Part 2 is available in electronic form on the council's website and there is an interactive version of the proposed changes to the policies map.
6.	<i>Plan Content</i>		
7.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.	NPPF Para 17, 20	The broad strategic policy framework is already set out in CPP1. CPP2 is a Part 2 plan which includes mainly non-strategic policies intended to support the implementation and delivery of CPP1. The only policies in CPP2 identified as 'strategic' are Policy SA7 and Policies SSA1-SSA7.

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			These policies are labelled as a Special Area policy and Strategic Site Allocations.
8.	Outline which policies are 'strategic' policies	NPPF Para 21	See answer to Q7.
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	CPP2 is a Part 2 plan, so the policies cover the period to 2030 and complement CPP1. This is indicated explicitly in CPP2 Paragraph 1.5.
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	<p>CPP2 is accompanied by proposed changes to the City Plan Policies Map which shows the additions and amendments that would result from the policies and allocations proposed in CPP2 alongside the already adopted CPP1. These include the proposed site allocations, new and/or updated policy designations related to CPP2 and the removal of allocations/designations related to BHLF policies that will be superseded on the adoption of CPP2 (a schedule of the proposed changes is set out in Appendix 6).</p> <p>The updated Policies Map has been published for consultation alongside the CPP2 at both the Draft Plan and Proposed Submission stage.</p>
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	As stated above, the broad City Plan strategy for housing, employment and other forms of development to address identified needs is set out in CPP1 (in particular Policy CP1 Housing Delivery sets out the minimum housing provision to 2030 and the broad sources of housing supply to achieve this). CPP2 includes additional strategic and non-strategic allocations which will contribute towards achieving the development targets for housing, employment and other forms of development.

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			The Housing Provision Topic Paper sets out in detail how CPP2 will assist in meeting the CPP1 housing target and demonstrates that CPP2 and other identified sources together provide sufficient housing land supply to meet and exceed the minimum target set in CPP1 policy CP1.
12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	The development management policies (DM1-DM46) provide further guidance on a range of policy issues to support the strategic policies in the adopted CPP1. The need for further detailed policies was highlighted in the CPP1.
13.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57	CPP2 does not identify additional development contributions over and above those already identified in CPP1 Policy CP7 Infrastructure and Developer Contributions and the Infrastructure Delivery Plan (CPP1 Annex 2).
	<i>Housing</i>		
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	The City Plan housing provision requirements are set out in CPP1 Policy CP1 Housing Delivery which was underpinned by local housing need assessments which pre-dated the standard methodology. As CPP2 is a Part 2 plan, the council has not sought to revisit the housing requirement already established in CPP1.
15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	The broad size, type and tenure of housing is set out in CPP1 Policy CP19 Housing Mix and its supporting text, based on various detailed housing needs studies (e.g the 2012 Local Housing Requirements Update and 2015 Objectively Assessed Need for Housing).

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			<p>CPP2 includes more specific policies which complement Policy CP19 by addressing the specialist housing requirements of particular groups, for example Policy DM1 Housing Quality, Choice and Mix which provides explicit support for self and custom built housing, and Policies DM4 Housing and Accommodation for Older Persons; DM5 Supported Accommodation (Specialist and Vulnerable Needs); and DM6 Build to Rent Housing. The council commissioned specific evidence studies to support Policies DM4 and DM6. These studies - the Older People Housing Needs Assessment (Nov 2019) and the Build to Rent Viability Study (Aug 2019) - were published alongside the CPP2 Proposed Submission.</p>
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	<p>Affordable housing needs including housing unit sizes and tenure mix are already addressed in CPP1 Policy CP20 Affordable Housing and the council's Affordable Housing Brief. However, CPP2 Policy DM6 Build to Rent Housing incorporates specific policy for the provision of affordable housing as part of build to rent developments, acknowledging that the economics of build to rent development differ from build for sale. The affordable housing requirements set out in Policy DM6 have been informed by the assessment of development viability and local housing affordability considerations as set out in the Build to Rent Study. It is intended to update the Affordable Housing Brief to include the specific requirements set out in the policy.</p>
17.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 64	<p>As noted above, affordable housing policy is set in CPP1 which was adopted prior to this version of the NPPF. CPP1 Policy CP20 Affordable Housing does not specify a tenure mix, but the council's Affordable Housing Brief sets an objective that 55% of affordable housing delivered</p>

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			<p>should be rented (social rent or affordable rent) and 45% should be intermediate tenures (e,g shared ownership).</p> <p>CPP2 does not include any new affordable policy, except in Policy DM6 with respect to build to rent housing. However, build to rent is specifically identified in the NPPF (para 64a) as an exemption from the 10% home ownership requirement (the NPPF Glossary indicates that affordable housing as part of build to rent developments should normally be provided in the form of affordable private rent).</p>
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	<p>The City Plan housing requirements and overall development strategy are set in CPP1 which preceded the inclusion of this requirement in the NPPF. The broad distribution of housing planned across the city is set out in CPP1 Policy CP1 Housing Delivery, reflecting the Development Areas and strategic allocations in CPP1 and the broad quantum of housing proposed on urban fringe sites. Further strategic and non-strategic housing sites (including urban fringe sites) are allocated in CPP2. These allocations are considered sufficient to meet and exceed the City Plan housing provision target without requiring any additional allocations in neighbourhood plans.</p> <p>It should also be noted that the Plan strategy primarily reflects the opportunities and constraints across the city rather than the distribution of existing population or housing need. The city is a compact and well integrated urban area and it would be difficult to narrow down housing needs/requirements to individual neighbourhood areas</p>

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19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	<p>CPP1 Policy CP1 Housing Delivery sets out the minimum housing provision to 2030 and identifies the broad sources of housing supply to achieve this. CPP1 identifies eight Development Areas (Policies DA1 – DA8) which are the focus for the majority of new housing development and identifies strategic allocations within these areas.</p> <p>CPP2 makes provision for additional housing through mixed use strategic allocations (Policies SSA1 Brighton General Hospital Site; SSA2 Combined Engineering Depot; SSA3 Land at Lyon Close; and SSA4 Sackville Trading Estate and Coal Yard), non-strategic brownfield sites (Policy H1 Housing Sites and Mixed Use Sites) and urban fringe sites (Policy H2 Housing Sites – Urban Fringe) which will contribute towards the overall City Plan housing provision.</p> <p>The Housing Provision Topic Paper accompanying CPP2 sets out in detail how the Plan will assist in meeting the CPP1 housing target. It demonstrates that the allocations in CPP2 together with the provision in CPP1 and other identified sources (e.g windfall sites) will together provide sufficient housing land supply to meet and exceed the minimum target set in CPP1 Policy CP1.</p>
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	The overall City Plan strategy for housing development is set out in CPP1 which was adopted prior to the current version of the NPPF. However, due to the dense urban character of Brighton & Hove and constrained supply of greenfield land, the majority of identified housing opportunities in the city are on sites of less than one hectare. This is reflected in the CPP2 allocations in Policy H1 Housing Sites and Mixed Use Sites (and to a lesser extent in Policy H2 Housing Sites – Urban

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			Fringe). The housing sites allocated in CPP2 would easily exceed the NPPF requirement.
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	The council does not consider that an exception site policy would be appropriate in Brighton & Hove due to the particular sensitivity of the urban fringe in terms of its landscape, ecological and open space value and importance as the setting for the South Downs National Park. The potential for housing development on the urban fringe was subject to comprehensive and very detailed consideration in the 2014 and 2015 Urban Fringe Assessment (UFA) studies, which included specific assessment of the landscape, ecology and archaeology impacts of housing development on all sites which were considered to have housing potential. The 2014 and 2015 UFA has led to the allocation of a small number of urban fringe sites in CPP2 Policy H2 Housing Sites – Urban Fringe. The remaining sites in the urban fringe were assessed to be unsuitable for development and any housing proposals would be subject to CPP1 Policies SA4 Urban Fringe and SA5 Setting of the South Downs National Park.
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	A housing trajectory is included in CPP1 in Annex 3: Housing Implementation Strategy. The trajectory has subsequently been updated on an annual basis in the council's published Strategic Housing Land Availability Assessments (SHLAA) Updates (the most recent being the SHLAA 2020 Update published in Feb 2021). The housing sites allocated in CPP2 have been incorporated within the overall City Plan trajectory.
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	This is not relevant to Brighton & Hove.

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24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	This is not relevant to Brighton & Hove.
25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	This is not relevant to Brighton & Hove.
<i>Economy</i>			
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	<p>CPP1 Policy CP2 Sustainable Economic Development sets out the overarching strategic policy related to the economy, recognising the need for inward investment opportunities, diversification and business resilience and the role and needs of certain sectors of the economy. The policy recognises the role of infrastructure technology in meeting the needs of enterprise and the need for apprenticeships, training and job opportunities for local residents including seeking contributions towards training. CPP1 Policies CP4 - CP6 support the retail, culture and leisure economy of the city recognising their role in the local and sub-regional economy. CPP1 Policy CP9 Sustainable Transport recognises the need to manage, maintain and improve travel and moment to support the role of the city as a sub-regional centre for jobs.</p> <p>CPP1 Policy CP3 Employment Land sets out the strategic approach to safeguarding needed employment sites and bringing forward new employment floorspace guided by the evidence base.</p> <p>The spatial strategy in CPP1 focuses development towards Development Areas (DA1-DA8) which provide opportunities for regeneration and include strategic allocations bringing forward employment floorspace to</p>

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			<p>meet a proportion of the forecast need for employment floorspace over the plan period. CPP1 acknowledges that there is a shortfall of employment sites to meet the identified needs and specifically identifies a role for CPP2 in allocating additional employment sites and mixed use allocations to ensure employment land delivery is maintained over the plan period (CP3.6).</p> <p>CPP2 Policy DM11 complements CPP1, whilst several of the strategic site allocations and the mixed use housing allocations in Policy H1 include specific provision for employment uses in accordance with CPP1 Policy CP3.6. These site allocations have been informed by the 2018 Housing and Employment Land Availability Assessment and an updated employment sites trajectory.</p>
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	<p>The overall economic vision and strategy is addressed in Paragraph 2.2 of CPP1 which sets out a clear vision for a strong and prosperous city – <i>“By 2030 Brighton & Hove will have a sustainable, resilient low carbon economy with sufficient jobs at all levels. Local residents will have the skills to enable them to progress through the labour market and earn incomes to help them live successfully within the city....”</i></p> <p>The strategic objectives SO1-SO3 set out aspirations to support the regeneration of the city and improve its economic performance.</p> <p>CPP1 Policy CP2 Sustainable Economic Development includes the stated aim to ‘positively and proactively encourage sustainable economic growth’ and the strategy for this is set out in the policy criteria.</p> <p>Preparation of CPP2 has been informed by the most recent Brighton & Hove Economic Strategy 2018-2023. The vision and strategy had regard</p>

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			<p>to the Coast to Capital Strategic Economic Plan. The Economic Strategy sets out a clear economic vision and emphasises the need to unlock the city’s capacity for growth through the delivery of homes, including affordable housing, and commercial floorspace and improving accessibility and connectivity.</p> <p>CPP2 supports this strategy through Policy DM11 New Business Floorspace; and through the allocation of sites for housing, and mixed uses including employment floorspace in Policies SSA–SSA4, SSA7 and E1 in accordance with CPP1 Policy CP3.6. Support for economic growth is also provided in Policy DM25 which promotes digital infrastructure and Policies DM33-DM36 which include sustainable transport measures.</p>
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	<p>This is primarily addressed through CPP1. CPP1 Policies CP2 Sustainable Economic Development and CP3 Employment Land seek to deliver forecast growth requirements of 112,240 sq m of office floorspace and 43,430 sq m of industrial floorspace over the plan period. CPP1 Policies DA1-DA8 identify opportunities for regeneration and include strategic allocations bringing forward employment floorspace to meet a proportion of this forecast need.</p> <p>The CPP2 complements the CPP1 by identifying further opportunities for employment floorspace in Policies SSA1-SSA4, in the mixed use housing allocations in Policy H1, and in Policy E1 in accordance with CP3.6. These allocations were informed by the Housing and Employment Land Availability Assessment 2018 and the site assessment process which is set out in the Site Allocations Topic Paper.</p>

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29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	<p>Policies in the CPP1 and CPP2 have been informed by the 2013 Employment Land Study and various Economic Strategies which have identified barriers to investment in the city: including lack of employment space, lack of homes including affordable housing, and the need to improve accessibility and connectivity.</p> <p>This is positively addressed in CPP1 through strategic policies CP1 Housing Delivery, CP20 Affordable Housing, CP2 Planning for Sustainable Economic Development, CP3 Employment Land and CP9 Sustainable Transport.</p> <p>CPP2 policies support the CPP1 through further site allocations for housing and employment uses in Policies SSA1-SSA4, SSA7, H1, H2 and E1. Support for economic growth is also provided in Policy DM25 which promotes digital infrastructure and Policies DM33-DM36 which include sustainable transport measures.</p>
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	<p>CPP1 Policy CP3 Employment Land recognises the need for flexibility and sets out in paragraph 4.31 the considerations that will be taken into account if proposals on identified sites come forward with less employment floorspace than identified; these considerations include viability and other planning benefits.</p> <p>CPP2 Policy DM11 New Business Floorspace requires new business floorspace to be designed to respond to changing economic conditions and support economic growth and to be 'future proofed' as far as possible to allow for add-on space to support enterprise growth or demand for move-on accommodation. Design features should allow for reconfiguration of internal space to suit new occupiers with different</p>

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			<p>space requirements and ensure that proposals meet the likely needs of a range of potential users.</p> <p>The sites allocated for mixed uses in Policies SA1-SSA4 and Policy H1 will allow opportunities for flexible working practices to be accommodated. The amounts of employment development in these policies are set as minima (unless otherwise specified).</p>
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	<p>The CPP1 established the approach through the Strategic Allocations for new employment floorspace provision, linked where appropriate to growth sectors of the economy, for example:</p> <ul style="list-style-type: none"> • DA3 Lewes Road – 15,600sqm employment floorspace including an Innovation Centre and a new Business School at Preston Barracks. • DA4 New England Quarter and London Road – additional office space (20,000sqm) on a range of sites – flexible space, protection of New England House to strengthen the digital media and creative industries cluster. • DA6 Hove Station – seeks a strengthening in the creative industries cluster. Whilst a reduction in employment floorspace is likely to result within strategic allocation, it should deliver equivalent number/more jobs through a shift from industrial into ‘higher density and value’ office jobs. Within DA6, outside strategic allocation an additional 1,000sqm of employment floorspace sought. • DA7 Toads Hole Valley - employment floorspace (25,000sqm) to support the knowledge-based economy; sustainable and flexible business space/ incubation space for universities.

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			<ul style="list-style-type: none"> DA8 Shoreham Harbour - additional employment floorspace (7500sqm) reference to exploring opportunities for sustainable energy generation. <p>CPP2 further supports and complements CPP1 through provision for employment uses as part of the strategic site allocations in Policies SSA1-SSA4 and SSA7 and mixed use housing allocations in Policy H1. In addition, Policy E1 identifies an opportunity site for new industrial floorspace alongside the allocated use for a strategic waste facility.</p> <p>The creative industries, culture and tourism are important sectors in the city's economy and are also addressed through CPP1. Provision for these sectors is included in CPP2 Policy DM17 Opportunity Areas for New Hotels and Safeguarding Conference Facilities and the strategic site allocations in Policies SSA5 and SSA6.</p>
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	This is not relevant to Brighton & Hove as the Plan area includes only small areas of countryside on the city's urban fringe, with much of the council area now covered by the South Downs National Park.
33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	CPP1 Policy SA4 explicitly allows for development within the city's urban fringe where a countryside location can be justified. The supporting paragraph 3.161 indicates that this would include proposals for farm diversification. The council has also published a Planning Advice Note on Farm Diversification (PAN01).
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	The main focus of City Plan policy for the urban fringe is to protect the remaining undeveloped land as part of the city's green network and to secure environmental improvements, better management and

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			<p>improved accessibility where appropriate. However, CPP1 Policy SA4 seeks to encourage opportunities for multi-functional uses such as, appropriate recreation and cultural experience and would allow for farm diversification (see above).</p> <p>Within CPP2, Policy SA7 Benfield Valley explicitly seeks the creation of 'gateway' facilities and interpretation facilities in connection with the South Downs National Park. The policy also allows for appropriate uses of the Benfield Barn and outbuildings for non-intensive community and /or recreational facilities appropriate to the area.</p>
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	This is not relevant to Brighton & Hove.
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	This is not relevant to Brighton & Hove.
37.	<i>Town centres</i>		
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	The Council undertook an update of its assessment of retail needs in 2011 which informed the retail hierarchy set out in CPP1 Policy CP4 Retail Provision. Policy CP4 states that "New centres may come forward; particularly local centres in currently underprovided for areas (see SA6 Sustainable Neighbourhoods). Any change to the boundary, role or

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			<p>status of a centre, or a proposed new centre, will be brought forward through Development Plan Documents”.</p> <p>CPP2 proposes to allocate ten Important Local Parades in Policy DM13 as smaller centres that provide access to day-to-day necessities such as newsagents, convenience stores, off-licences, pharmacies and post offices, within walking distance from home.</p> <p>As an update to the hierarchy of shopping centres set out in CPP1 Policy CP4, the secondary frontage of the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. This centre is shown on the updated Policies Map and is detailed within Policy DM12 in CPP2.</p>
39.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	The shopping areas within the retail hierarchy have been reassessed to ensure that they remain appropriate and viable centres. The Policies Map defines the Primary Shopping Areas for these centres. Policy DM12 in CPP2 sets out the range of permitted uses within these centres.
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	CPP2 Policy DM16 Markets sets out how the council will seek to retain and enhance existing markets and how it will assess proposals for new markets. Planning permission will be refused for development which would result in the permanent loss of markets or pitches unless appropriate comparable replacement provision is made subject to the impact on existing shopping facilities and markets.
41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	The council has undertaken a recent update on its assessment of retail needs. The Retail Study Update 2011 has informed the retail hierarchy as set out in CPP1 Policy CP4 Retail Provision.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>The study forecast quantitative needs of 58,313 sq m of comparison floorspace by 2030 and 2,967 sq m convenience floorspace by 2030 and recommends that this should be directed into the redevelopment of the Brighton Centre and Churchill Square (CPP1 Policy DA1).</p> <p>The comparison floorspace need was addressed by the following retail site allocations in CPP1:</p> <ul style="list-style-type: none"> • Policy DA1 - supports the extension of Churchill Square shopping centre to provide a minimum 20,000 sq m of new retail comparisons goods floorspace. • Policy DA2 – allocation of 5,000 sq m retail development at Brighton Marina Inner Harbour. • Additional retail sites and proposed changes to retail centre boundaries to be allocated and/ or amended in Part 2 of the City Plan.
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	This is not relevant to Brighton & Hove.
43.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	CPP2 Policies DM12 and DM13 allow scope to increase the housing stock within the designated centres by increasing densities or by introducing housing on upper floors, or to the rear of commercial properties. Policy DM12 sets out that residential use may be appropriate above or to the rear of units in shopping centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved. Policy DM13 states that changes of use at

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			ground floor to residential will be permitted to the rear or on upper floors in Important Local Parades.
44.	<i>Healthy and safe communities</i>		
45.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 91	CPP1 (paragraph 2.5) sets strategic objectives for healthy and balanced communities where everyone has a right to a decent home, a good education, a job that pays for a decent standard of living, good healthcare and to feel safe in their community. Several policies in both CPP1 and CPP2 provide further policy detail, including: CP16 Open Space, CP17 Sports Provision and CP18 Healthy City in CPP1; and DM33 Safe, Sustainable and Active Travel and DM40 Protection of the Environment and Health in CPP2.
46.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	<p>CPP1 Policy SA6 Sustainable Neighbourhoods positively identifies city wide priorities for sustainable neighbourhoods, whilst CPP1 Policies CP16 and CP17 relate to the protection and provision of open spaces and sports/recreation facilities.</p> <p>CPP2 includes Policy DM9 Community Facilities which seeks to safeguard existing community facilities and support the provision of new facilities. Policy DM10 specifically seeks to protect existing public houses recognising their unique role as a focus for local communities and the difficult of replacing those which have been lost, particularly in established residential areas. Strategic Site Allocations include opportunities for community facilities.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
47.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	CPP1 (paragraph 2.5) sets out the vision for healthy and balanced communities where everyone has a right to a decent home, a good education, a job that pays for a decent standard of living, good healthcare and to feel safe in their community. CPP1 Policy CP18 Healthy City sets out how planning will support programmes and strategies which aim to reduce health inequalities and promote healthier lifestyles.
48.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	CPP2 Policy DM9 safeguards existing community facilities unless it can be demonstrated that replacement facilities are provided in an appropriate location, the facility is no longer needed, or the building no longer suitable to accommodate the current use or an alternative suitable community use and cannot be reasonably adapted to do so. Similar requirement for pubs in Policy DM10
49.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	<p>CPP2 Policy DM9 Community Facilities sets out a flexible approach to retaining such facilities allowing for partial loss of floorspace through change of use where that the operational need of the community use requires less floorspace or where continuation of the existing use would otherwise be unviable and can be sustained by cross-subsidy. Modernisation and consolidation of community facilities at Community Hubs is supported to improve accessibility.</p> <p>CPP2 Policies DM12 and DM13 set out criteria to manage the change of use of shops and other town centre uses, whilst welcoming a wide range of uses to town centres and allowing them to adapt and change. CPP2 Policy DM13 allocates ten Important Local Parades to provide for local access to day-to-day necessities such as a newsagent, convenience store</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			off-licence, pharmacies and post offices, within walking distance from home.
50.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	<p>The overall spatial strategy set out in CPP1 focuses most new development within the eight Development Areas defined in Policies DA1-DA8. These set out broad provision targets and strategic allocations to deliver a mix of housing, employment and supporting community uses.</p> <p>CPP2 identifies additional strategic allocations for a mix of uses in Policies SSA1-SSA7 and allocates additional housing sites within the built-up area in locations which either already benefit from close proximity to good sustainable transport links or are areas where accessibility can be improved.</p>
51.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	<p>CPP1 already includes a number of policies which promote and support estate regeneration, in particular Policy SA6 Sustainable Communities and this will also be assisted by some of the Development Area policies which promote major redevelopment close to residential areas (e.g DA2, DA3, DA6). CPP2 Policy H1 Housing Sites and Mixed Use Sites includes a number of housing allocations which involve the redevelopment of council-owned sites and facilities on residential estates. The council is taking a lead role in estate regeneration through its New Homes for Neighbourhoods programme and Joint Venture partnership with the Hyde Group (Homes for Brighton & Hove).</p>
52.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	<p>Several policies in CPP1 address elements of health and safety, for example Policy CP18 Healthy City, section 4 of which encourages development that works towards Lifetime Neighbourhood principles;</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>promotes health, safety and active living for all age groups, including healthy living options for older people, active space for children and encourages physically active modes of transport.</p> <p>In CPP2, Policy DM33 Safe, Sustainable and Active Travel promotes safe, active travel and Policy DM41 Polluted sites, hazardous substances & land stability requires that development proposals must ensure that they do not prejudice health, safety, natural capital and the quality of the city's environment.</p>
53.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	<p>This issue is covered in City Plan Part One. CPP1 supports the delivery of the replacement and enhancement of sports provision currently provided at the King Alfred Leisure Centre (Policy SA1) and leisure/ recreation use at the Black Rock Site (Policy DA2).</p> <p>CPP1 Policy CP16 Open Space sets out the approach to safeguarding and enhancing existing open space and sets out requirements for new development to contribute to the provision of and improve the quality, quantity, variety and accessibility of public open space to meet the needs it generates.</p> <p>CPP1 Policy CP17 Sports Provision sets out how sports services, facilities and spaces will be safeguarded, expanded, enhanced to facilitate the council's aspiration to increase participation in sports and physical activity.</p>
54.	Protect and enhance public rights of way and access.	NPPF Para 98	In CPP1, Policy CP9 Sustainable Transport seeks to improve Rights of Way and access to open spaces and the National Park, including

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>wheelchair friendly provision and Policy SA4 Urban Fringe also promotes safe public access to the countryside.</p> <p>In CPP2, Policy SA7 Benfield Valley seeks improved public access through the site and to the wider natural environment through the provision and improvement of safe pedestrian and cyclist access. Policy H2 Housing Sites – Urban Fringe requires that housing developments on allocated urban fringe sites incorporates opportunities to secure additional and /or improved publicly accessible open space provision within the proposed scheme.</p>
55.	<i>Transport</i>		
56.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	<p>Strategic Objective 11 in CPP1 seeks to provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion, reduce noise and promote active travel. Policy CP9 Sustainable Transport is the overarching citywide transport policy in the City Plan. It is set out in two parts, with Section A concerned with implementing the Transport Strategy at a regional and local level; and Section B relating to transport measures to be undertaken to manage the demand for travel.</p> <p>The overall development strategy set out in CPP1 focuses most development towards identified Development Areas (Policies DA1-DA8) which are areas of the city which either already benefit from proximity to good sustainable transport links or are areas where accessibility can be improved. Each of the DA policies sets local priorities for transport improvements including public transport, public realm, cycling and walking.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
57.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.	NPPF Para 104	As noted previously, CPP1 focuses most new development towards identified Development Areas (Policies DA1-DA8) which are proposed for a mix of housing, employment, commercial and community uses linked to sustainable transport. Within CPP2, Policies SSA1–SSA7 allocate sites for strategic development/redevelopment providing for a mix of uses and sustainable transport infrastructure and accessibility improvements.
58.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	No such sites or routes have been identified in Brighton & Hove.
59.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	Policy DM33 Safe, Sustainable and Active Travel promotes and provides for the use of sustainable transport and active travel by prioritising walking, cycling and public transport in the city. It sets out requirements to ensure that new development contributes towards the provision and enhancement of walking and cycling networks. This supports the objectives, projects and programmes set out in the Local Transport Plan, the Local Cycling and Walking Infrastructure Plan (LCWIP) and other strategy and policy documents.
60.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104	Policy DM34 Transport Interchanges provides support for larger scale transport infrastructure including facilities, coach stations and parking, lorry parking or freight consolidation centres
61.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	This is not relevant to Brighton & Hove

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
62.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	No specific need for additional overnight lorry parking has been identified. If a proposal was brought forward, it would be supported subject to the criteria in Policy DM34 Transport Interchanges.
63.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 108	<p>The strategic site allocation policies in CPP2 (Policies SSA1-SSA7) include requirements to promote and facilitate sustainable transport infrastructure and accessibility improvements. For example, Policy SSA1 Brighton General Hospital includes criterion (d) which states “Deliver sustainable transport infrastructure improvements that provide and promote public and sustainable transport and improved safe pedestrian and cyclist access to and through the site”. Similar requirements are set out in the other strategic allocation policies.</p> <p>Policy H2 Housing Sites – Urban Fringe also requires sustainable transport/accessibility improvements in connection with new housing development on allocated urban fringe sites. Specific transport requirements are not set out in Policies H1 and H3 which cover smaller non-strategic allocations within the built-up area, however development would be subject to the requirements of general policies such as Policy DM33 Safe, Sustainable and Active Travel.</p> <p>The impact of the developments proposed in CPP2 on the strategic road network has been assessed through an update to the Strategic Transport Assessment and extensive dialogue with Highways England.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
64.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	NPPF Para 109	Further modelling work has been undertaken to ensure that the cumulative impact that would be created by the additional housing development sites allocated in CPP2 does not have an unacceptable impact on the operation of the SRN (in particular the junctions on the A27) to address a representation by Highways England. City Plan Part 2 Policy DM35 Travel Plans and Transport Assessments states that planning permission will be granted for developments that meet all of the four criteria, which include criterion a) Do not create road safety problems or dangers for any road user.
65.	<i>Communications</i>		
66.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	<p>Within CPP1, Policy CP2 Sustainable Economic Development (section 4) supports the provision and delivery of the information and communication technology (ICT) infrastructure the city economy requires; in particular, affordable, competitive broadband access meeting the needs of enterprise and individuals. Further detail is set out in the Infrastructure Delivery Plan that accompanies CPP1.</p> <p>CPP2 further supports this in Policy DM25 Communications Infrastructure which provides a supportive framework for the next generation of mobile technology and requires that new development or major renovation works to existing buildings ensure that sufficient ducting space for future digital full fibre connectivity infrastructure is provided as part of the development. Ensuring the city's digital infrastructure is future ready will allow the city to maintain its role as a leading digital tech hub.</p>
67.	<i>Making effective use of land</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
68.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117	<p>CPP1 sets out the overall City Plan strategy which seeks to achieve a balanced and sustainable approach to accommodating growth, maximising the effective use of land within the context of the city's significant physical and environmental constraints. In her final report, the CPP1 examiner considered that the Plan struck the right balance between meeting the need for new housing and retaining open space and provided an appropriate framework for the allocation of sites in CPP2.</p> <p>CPP2 contains a range of policies designed to support the implementation and delivery of CPP1, including the allocation of additional housing and other development sites and detailed development management policies.</p>
69.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.	NPPF Para 117	<p>CPP1 sets out the strategic planning policy framework to guide new development across the city to 2030, including planning to meet the city's objectively assessed needs for housing and employment subject to the city's identified physical and environmental constraints. The CPP1 strategy seeks to maximise the use of brownfield land, in particular by focusing growth towards the eight designated Development Areas (seven of which comprise previously developed land within the city identified as suitable for redevelopment/regeneration). CPP1 also seeks to promote higher density development within the DAs (Policy CP14 Housing Density) and allows for taller buildings (+18m) in suitable locations (Policy CP12 Urban Design).</p> <p>CPP2 supports the implementation and delivery of CPP1, including allocating seven further strategic sites (six of which are on brownfield land) (Policies SSA1 – SSA7) and further non-strategic housing and</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>student accommodation sites (Policies H1 and H3) within the existing built-up area. In accordance with the CPP1 strategy, some limited provision is made for greenfield housing development on urban fringe sites allocated in Policy H2 Housing Sites – Urban Fringe.</p> <p>Overall, it is estimated that around 87% of planned new residential development over the City Plan period (2010-2030) will take place on brownfield land.</p>
70.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	<p>Subject to the strategic planning policy framework already set out in CPP1, CPP2 policies seek to make effective use of identified development sites for housing and other uses (e.g employment, retail, leisure, community uses and open space) whilst also delivering a range of net environmental gains.</p> <p>As set out elsewhere, CPP2 includes a range of specific development management policies which seek to ensure good design, and sustainability and high energy standards in new development, to protect and enhance green spaces/environmental assets, and to mitigate the impacts of development in terms of pollution, CO2 emissions etc.</p> <p>CPP2 includes specific site/area allocation policies which seek to ensure that planned housing and other development will deliver wider benefits for the community and environment.</p> <ul style="list-style-type: none"> • Policy SA7 Benfield Valley seeks the protection, enhancement and long term management of the valley’s open spaces, wildlife habitats and heritage assets and to improve and enhance public access and connectivity.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<ul style="list-style-type: none"> • Policies SSA1 – SSA7 allocate identified strategic sites for mixed use redevelopment/development linked to provision or enhancements to green infrastructure/open space, sustainability transport & accessibility, net biodiversity gains etc. • Policy H1 Housing Sites and Mixed Use Sites identifies where allocated sites are suitable for a mix of housing and other uses, including setting out the types and indicative scale of other uses that will be appropriate. • Policy H2 Housing Sites – Urban Fringe makes specific provision for planned housing development on the urban fringe to deliver improvements to green infrastructure/open space, site accessibility/linkages, biodiversity net gains and CO2 reductions/energy efficiency measures.
71.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.	NPPF Para 118	<p>The framework for protecting and enhancing the city’s undeveloped land as a multi-functional green infrastructure network is already established in CPP1, in particular through Policies CP10 Biodiversity, CP11 Managing Flood Risk, CP16 Open Space and SA4 Urban Fringe.</p> <p>CPP2 contains several policies which set out further specific policy requirements relating to the protection, enhancement and management of undeveloped land, in particular Policies DM37 Green Infrastructure and Nature Conservation, DM22 Landscape Design and Trees and DM43 Sustainable Drainage. Specific policy requirements are also incorporated into the CPP2 site/area allocation policies, notably H2 Housing Sites - Urban Fringe and SA7 Benfield Valley.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
72.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	As set out in response to Q69, the policies in both CPP1 and CPP2 give strong support to the effective re-use of suitable brownfield land within the overall development strategy and through the policies for urban design and housing density. The strategic and non-strategic allocations in both CPP1 and CPP2 include many currently derelict brownfield sites. These include several sites potentially subject to ground contamination such as the Gas Works site (part of the CPP1 Policy DA2 strategic allocation) and the strategic allocations in CPP2 Policies SSA1 - SSA4 (Brighton General Hospital, Combined Engineering Depot, Land at Lyon Close, and Sackville Trading Estate/Coal Yard). CPP2 includes Policy DM40 Protection of the Environment and Health – Pollution and Nuisance and Policy DM41 Polluted sites, hazardous substances & land stability, which set out specific requirements relating to the development of sites subject to pollution and ground instability. These policies are also cross-referenced in the supporting text to CPP2 Policies SSA1 – SSA4.
73.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	The overall City Plan strategy set out in CPP1 directs new development primarily towards the eight Development Areas designated in Policies DA1-DA8, seven of which are regeneration areas focused on the redevelopment and intensification of under-used or derelict land and buildings. CPP1 also seeks to promote higher density development within the DAs (Policy CP14 Housing Density) and allows for taller buildings (+18m) in suitable locations (Policy CP12 Urban Design). Policy CP14 Housing Density sets a general expectation for development to achieve a minimum net density of 50 dwellings per hectare (dph) with a minimum of 100 dph within Development Areas DA1-6 and DA8.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>CPP2 supports these principles, through the allocation of further brownfield strategic sites (six of which are on brownfield land) (Policies SSA1 – SSA7), non-strategic housing and student accommodation sites (Policies H1 and H3) within the existing built-up area.</p> <p>In addition, CPP2 Policy DM19 Maximising Development Potential specifically requires that development proposals should avoid the under-development of sites and seek to maximise opportunities for the development and use of land.</p>
74.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	As set out elsewhere, the City Plan policies promote mixed use development/ redevelopment comprising residential and commercial floorspace in many locations, including within the strategic development allocations (CPP1 DA1-DA8 and CPP2 SSA1-SSA4) and on non-strategic mixed use allocations (Policy H1). In addition, CPP2 Policy DM12 allows for residential use above or to the rear of units in designated Regional, Town, District and Local Shopping Centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved. Similarly, Policy DM13 allows for change of use to residential of upper floors in Important Local Parades.
75.	Reflect changes in the demand for land.	NPPF Para 120	Development opportunities and site availability are very constrained in Brighton & Hove and there are competing demands for land. Whilst there is a very substantial need for housing (which cannot be met in full through the City Plan), there is also demand for employment floorspace (both office and industrial) and there is a continuing need to protect and enhance key public services, community facilities and open space. The overall City Plan strategy includes policies such as CPP1 policies CP3 Employment Land and CP16 Open Space, and CPP2 Policy DM9

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>Community Facilities which aim to protect existing land uses where they remain important for the city and/or valuable to the local community, but allow for re-use of the land for other uses where it can be demonstrated that the existing use is redundant or can be replaced/enhanced elsewhere. At the same time, the City Plan seeks to promote the better and more efficient use of land through mixed use redevelopment and intensification of land uses within the Policy DA1-DA8 Development Areas and Strategic Allocations, and through general policies such as SA6 Sustainable Communities.</p> <p>This approach has informed the identification of potential site allocations in CPP2, which has been evidenced by detailed land availability studies, in particular the Strategic Housing Land Availability Assessment (SHLAA) and the Housing and Employment Land Study 2017. These studies identified a significant number of redevelopment opportunities involving sites previously used for employment, public buildings or community facilities which are now outworn or redundant. This has been followed up by the further detailed site assessments set out in the Site Allocations Topic Paper leading to the allocation of sites in CPP2. These include four strategic sites (Policies SSA1 Brighton General Hospital, SSA2 Combined Engineering Depot, SSA3 Land at Lyon Close and SSA4 Sackville Trading Estate/Coal Yard) which are allocated for residential-led mixed use development, and 39 non-strategic sites within the existing built-up area which are allocated in Policy H1 Housing Sites and Mixed Use Sites for either residential or residential-led mixed development/redevelopment.</p>
76.	Support development that makes efficient use of land, taking into account the need for different types of housing and	NPPF Para 122	The City Plan strategy and policies place strong emphasis on maximising the efficient use of land, taking account of the limited supply of suitable

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.		<p>development opportunities in Brighton & Hove. CPP1 contains a range of policies that promote high density and mixed use development (e.g Policy SA6 Sustainable Communities and Policy CP12 Urban Design), whilst identifying eight Development Areas (DA1-DA8) for major growth. More specifically, CPP1 Policy CP14 Housing Density sets a general expectation for development to achieve a minimum net density of 50 dwellings per hectare (dph) with a minimum of 100 dph within Development Areas DA1-6 and DA8.</p> <p>CPP2 strengthens this approach further through implementation/ development management policies which support higher density and mixed use development (e.g DM1 Housing Quality, Choice and Mix; DM18 High Quality Design and Places; and DM19 Maximising Development Potential) and through allocating strategic and non-strategic sites (Policies SSA1-SSA7 and H1-H3). As set out in the Site Allocations Topic Paper, all sites proposed for allocation have been subject to detailed analysis looking at factors including location and setting, the character of the surrounding area, proximity of local services, infrastructure capacity, accessibility by sustainable transport, and potential physical and environmental constraints.</p>
77.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	As noted elsewhere, the City Plan takes a strong policy approach to promote higher density housing development, in particular through CPP1 Policy CP14 Housing Density which sets a general expectation for development to achieve a minimum net density of 50 dwellings per hectare (dph) with a minimum of 100 dph within Development Areas DA1-6 and DA8.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>CPP2 Policy DM19 Maximising Development Potential strengthens CPP1 Policy CP14 further by requiring that development proposals should avoid the under-development of sites and seek to maximise opportunities for the development and use of land.</p> <p>The CPP2 housing allocations in Policy H1 Housing Sites and Mixed Use Sites and H2 Housing Sites – Urban Fringe include indicative housing numbers based on detailed site assessments undertaken by the council which are set out in the Site Allocations Topic Paper. These are intended to maximise housing potential taking account of identified site constraints and potential development impacts (set out in the Site Allocations Topic Paper).</p>
78.	<i>Design</i>		
79.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	<p>CPP1 (Section 2, paragraph 2.4) sets a vision and objectives for an attractive city; that the city is and remains a rewarding, safe and healthier place for residents, businesses and visitors alike with a higher quality built environment and a protected and enhanced natural environment.</p> <p>CPP1 Policy CP12 Urban Design sets out the general strategic design criteria required for new development, including the policy approach for the development of tall buildings.</p> <p>These strategic policies are complemented by CPP2 Policies DM18 – DM21 which provide further detailed policy guidance.</p> <ul style="list-style-type: none"> Policy DM18 High Quality Design and Places states that the council will require an integrated approach to the design process to help to

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>create sustainable, attractive and successful places to live and work in our city. The policy will be supported by an Urban Design Framework SPD. The Draft UDF SPD was subject to public consultation in late 2020 and is intended to be formally adopted in Summer 2021.</p> <ul style="list-style-type: none"> • Policy DM19 Maximising Development Potential is intended to ensure the effective and efficient use of development sites in a constrained city. • Policy DM21 Extensions and Alterations requires high quality designed extensions and alterations that respond creatively to the site and its context.
80.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 127	<p>These requirements are addressed by CPP2 Policy DM18 High Quality Design and Places and Policy DM22 Landscape Design and Trees.</p> <p>CPP1 and CPP2 will be supported by an Urban Design Framework SPD which is due to be adopted in Summer 2021 and will provide detailed guidance on these matters.</p>
81.	<i>Green Belt</i>		
82.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support	NPPF Para 135	This is not relevant to Brighton & Hove.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	adjoining areas, and how new Green Belt would meet other objectives of the Framework.		
83.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136	This is not relevant to Brighton & Hove.
84.	Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the	NPPF Para 137 & 138	This is not relevant to Brighton & Hove.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	environmental quality and accessibility of remaining Green Belt land.		
85.	When defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, and define boundaries clearly.	NPPF Para 139	This is not relevant to Brighton & Hove.
86.	<i>Climate change, flooding and coastal change</i>		
87.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 149	Section 1 of CPP1 sets out the context and challenges faced locally in relation to climate change, flooding and coastal change and the strategic objectives and policies in CPP1 seek to address those challenges. The CPP1 spatial strategy focuses development in the most accessible areas of the city (the Development Areas identified in Policies DA1-DA8) where there are good existing public transport links or where there is scope for improvement and this is supported by Policy CP9 Sustainable Transport. Other CPP1 policies address the cross-cutting issues of climate change adaptation, including Policies CP10 Biodiversity, CP11 Flood Risk and CP13 Public Streets and Spaces (in relation to street trees).

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>CPP1 Policy CP8 Sustainable Buildings sets out that the council will seek that all new development 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. The policy sets out the local standards to reduce carbon emissions to help deliver national and local targets. Specifically criterion a) requires all development proposals to address climate change and adaptation. The risk of overheating is addressed in CPP1 Policy CP8 part g) and h).</p> <p>The role of landscaping and green infrastructure in mitigating and adapting to climate change is addressed further in CPP2 Policy DM22 Landscape Design and Trees and Policy DM37 Green Infrastructure and Nature Conservation.</p> <p>CPP1 Policy CP8 incorporates the Government’s ‘optional’ higher water efficiency standards (110 litres per day) in new development based on the evidence that Brighton & Hove is a water stressed area. Policy CP8 e) also ‘aspires towards water neutrality by meeting higher water efficiency standards and incorporating facilities to recycle, harvest and conserve water resources’.</p> <p>Water supply and quality is supported by CPP2 Policy DM42 Protecting the Water Environment which reflects the need to safeguard the local chalk aquifer.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>CPP1 Policy CP8 requires all development to incorporate measures to reduce greenhouse gas emissions. Part 2e of the policy supports improvements of energy efficiency in existing buildings when these are part of a planning application. The following paragraph in the policy outlines opportunities for using financial contributions as a mitigation measure when policy requirements cannot be met onsite which can include improvement of energy efficiency of existing buildings.</p>
88.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 149	This is addressed in the answer to Q87.
89.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 151	<p>CPP1 Policy CP8 Sustainable Building sets out the local standards to reduce carbon emissions to help deliver national and local targets. The priority is to minimise energy demand and then address how energy will be supplied and renewable technologies will be incorporated – without specifying a particular type of technology (given rapid changes in this area).</p> <p>CPP2 Policy DM44 Energy Efficiency and Renewables extends the 19% adopted local carbon emission standard for new residential development (at least 19% carbon emission reductions improvements against Part L) to apply to all development including conversions and change of use of existing buildings. The policy has been informed by the 2018 Brighton & Hove Energy Study and is intended to help deliver the council’s local commitment to be carbon neutral by 2030.</p> <p>Part 3 of Policy DM44 encourages opportunities to achieve greater reductions in CO2 emissions in specific areas of the city through the use</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies. Proposed modifications to Policy DM44 seek to address the Government’s published Future Homes and Buildings Standard road map.</p> <p>CPP1 identifies the opportunities for District Heating in certain development area policies of the city and encourages development to consider low and zero carbon decentralised energy and particular heat networks that either connect or ensure future connection (e.g Policy DA6 Hove Station Area and Policy DA7 Toads Hole Valley). This is supported by CPP2 Policies DM45 Community Energy and DM46 Heating and Cooling Network Infrastructure.</p>
90.	Strategic policies should manage flood risk from all sources.	NPPF Para 156	<p>CPP1 Policy CP11 Flood Risk sets out the overarching policy on flood risk. Further the strategy for accommodating growth in the CPP1 was informed by a Strategic Flood Risk Assessment. A Sequential and Exception Test was undertaken as not all sites could be located within Flood Zone 1.</p> <p>The proposed site allocations in CPP2 have been informed by an updated Strategic Flood Risk Assessment Level 1 and Level 2 Screening and an update to the Sequential and Exception Test has been undertaken to support site allocations in the CPP2. The SFRA update has used the latest climate changes allowances (SFRA addendum) and looked at all forms of flooding.</p> <p>CPP2 Policy DM39 Development on the Seafront complements CPP1 Policy CP11 Flood Risk and CPP1 Policy SA1 The Seafront, by ensuring appropriate designed and maintained coastal defences in line with</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>shoreline management strategies. The policy requires that proposals on the seafront should take account of particular conditions experienced in coastal zone and be resilient to the effects of climate change, and should be designed to avoid adverse impacts from and on coastal marine environment.</p> <p>CPP2 Policy DM43 Sustainable Urban Drainage requires Sustainable Drainage Systems (SuDS) in all new development and recognises its role in helping to deliver improved biodiversity, and enhanced landscape/ townscape. This is supported by a Sustainable Drainage SPD.</p>
91.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	<p>CPP1 Policy CP11 Flood Risk sets out the overarching policy on flood risk and in CPP1 Policy SA1 The Seafront addresses coastal management. The development strategy set out in CPP1 was informed by a Strategic Flood Risk Assessment and a Sequential and Exception Test was undertaken as not all sites could be located within Flood Zone 1.</p> <p>The proposed site allocations in CPP2 have been informed by a Strategic Flood Risk Assessment Level 1 and Level 2 Screening and an update to the Sequential and Exception Test has been undertaken. CPP2 Policy DM39 Development on the Seafront complements CPP1 Policy CP11 Flood Risk and SA1 The Seafront by ensuring appropriate designed and maintained coastal defences in line with shoreline management strategies. The policy requires that proposals on the seafront should take account of particular conditions experienced in coastal zone and be resilient to the effects of climate change, and should be designed to avoid adverse impacts from and on coastal marine environment.</p>
92.	<i>Natural environment</i>		

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
93.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 170	<p>Strategic Objective SO14 in CPP1 supports conservation and enhancement of the South Downs National Park including enhancements to downland to achieve local BAP objectives. CPP1 Policy SA5 The Setting of the South Downs National Park sets out policy to protect the setting of the National Park include policy to ensure that any development is consistent with the purposes of the National Park.</p> <p>More generally, CPP1 Policy SA4 Urban Fringe promotes and supports the careful use and management of land within the city’s urban fringe, seeks to protect and enhance the wider landscape role of the urban fringe, promotes the urban fringe as part of city’s green network, and protects sensitive groundwater source protection zones.</p> <p>Strategic Objective SO10 in CPP1 supports implementation of Biosphere Reserve objectives and seeks to conserve and enhance biodiversity. CPP1 policy CP10 Biodiversity provides overarching strategic policy which sets out the intention to develop programmes and strategies which aim to conserve, restore and enhance biodiversity and promote improved access. The policy also requires development proposals to achieve net biodiversity gains, support the achievement of Biosphere objectives and requires all development proposals to contribute towards ecosystem services.</p> <p>CPP2 supports these strategic policies in Policy DM37 Green Infrastructure and Nature Conservation. The policy seeks to safeguard existing green infrastructure to ensure retention of this natural capital and ecosystem services provided; and to conserve and enhance various nature conservation features including those of biodiversity and</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>geodiversity value. It also sets out specific criteria against which development proposals affecting designated sites of international, national and local importance; protected species and biodiversity in the wider environment will be assessed.</p> <p>With regard to the coastal and marine environment, CPP1 Policy SA1 The Seafront includes a priority relating to the importance of conserving coastal habitats and improving the marine environment, including sea water quality and coastal zone management. CPP2 Policy DM37 Green Infrastructure and Nature Conservation seeks to enhance marine and coastal biodiversity.</p>
94.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 171	<p>CPP1 Policy CP10 Biodiversity sets out overarching strategic policy which seeks to improve, conserve, restore and enhance biodiversity and promote improved access. Part 3 of the policy indicates that criteria-based policies will be established in CPP2 against which development proposals affecting designated sites of international, national and local importance; protected species and biodiversity in the wider environment will be judged.</p> <p>Within CPP2, Policy DM37 Green Infrastructure and Nature Conservation sets out the hierarchy of internationally, nationally, and locally designated sites of biodiversity or geodiversity importance including SACs, SSSIs, NNRs, LGS, LWS, and LNRs and establishes criteria against which proposals affecting designated sites will be assessed.</p> <p>The South Downs Way Ahead Nature Improvement Area (NIA) incorporates parts of the urban area, urban fringe, seafront and surrounding downland (identified as the Green Network). CPP1 Policy</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>CP10 sets out how, in partnership with the neighbouring authorities, the council will achieve landscape-scale improvements to biodiversity within the NIA including linking and repairing habitats and conserving, restoring and recreating priority habitats within it. CPP2 policy DM37 expects development to support and enhance the NIA.</p> <p>The city and surrounding area is designated as the Brighton & Lewes Downs UNESCO Biosphere Reserve, a partnership project crossing local authority boundaries which seeks to demonstrate conservation and sustainable development. Implementation of the objectives of the Biosphere Reserve is referred to within Strategic Objective 10. CPP1 Policy CP10 and CPP2 Policy DM37 both seek to ensure the natural capital of the area is retained and enhanced and complements achieving Biosphere objectives.</p>
95.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 173	This is not relevant to Brighton & Hove.
96.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 174	<p>The South Downs Way Ahead NIA and designated sites of international, national and local biodiversity and geodiversity value are mapped on the Policies Map.</p> <p>Strategic Objective SO10 in CPP1 seeks to conserve and enhance biodiversity. CPP1 Policy CP10 Biodiversity provides overarching strategic policy which sets out the intention to develop programmes and strategies which aim to conserve, restore and enhance biodiversity including within the NIA to achieve landscape-scale improvements as well as priority habitats and species. The policy requires development proposals to conserve existing biodiversity and achieve net biodiversity</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>gains and contribute towards ecosystem services. Policy CP8 Sustainable Buildings also expects all development to enhance biodiversity.</p> <p>Within CPP2, Policy DM37 Green Infrastructure and Nature Conservation seeks to safeguard green infrastructure, conserve and enhance biodiversity features ensuring that a net gain is achieved, priority species and habitats are protected, and invasive species are controlled. The policy provides for the protection and enhancement of important nature conservation features such as the NIA, protected species and habitats, ancient woodland, protected trees, the National Elm collection and marine and coastal biodiversity.</p>
97.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 178 & 180	<p>Strategic Objective SO22 in CPP1 seeks to ensure pollution is minimised and improvements in water, land and air quality are sought. CPP1 Policy CP8 Sustainable Buildings encourages all development to reduce land pollution.</p> <p>Within CPP2, Policy DM41 Polluted Sites, Hazardous Substances and Land Stability seeks to ensure that proposals do not prejudice health, safety, natural capital and the environment. The policy sets out requirements that must be met including ensuring that development takes account of ground conditions and land instability; that hazardous substances and installations have been addressed; and that remediation of polluted land to ensure end-users and future occupants are safeguarded and the environment is protected.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
98.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	<p>Strategic Objective SO11 in CPP1 supports the provision of an integrated, safe and sustainable transport system to improve air quality. In addition, Strategic Objective SO22 seeks to ensure pollution is minimised and improvements in water, land and air quality are sought. CPP1 Policy CP8 Sustainable Buildings encourages all development to reduce air pollution and Policy CP9 Sustainable Transport sets out various measures to address air quality issues including through bus and rail network improvements; improving traffic flow and congestion and promoting the use of alternative fuels; improving the public realm, cycle network and rights of way to encourage walking and cycling; and a coordinated approach to parking provision.</p> <p>Several of the Development Area policies in CPP1, including Policies DA1, DA3, DA4, and DA5 also seek to improve air quality, including policy references to implementing the Air Quality Action Plan and ensuring new development proposals take account of local air quality issues.</p> <p>Within CPP2, Policy DM40 Protection of the Environment and Health – Pollution and Nuisance sets out criteria against which development proposals will be assessed. This includes supporting implementation of the local Air Quality Action Plan and meeting air quality targets; providing an Air Quality Impact Assessment; having a positive impact on air quality when located in or close to an AQMA and preventing certain combustion and CHP plants from being implemented near sensitive receptors including the AQMA. Paragraph 2.308 refers to ensuring that cumulative impacts are taken into account, including with those arising from development beyond the City Plan area.</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
99.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	CPP2 Policy DM40 Protection of the Environment and Health – Pollution and Nuisance sets out criteria which require proposals liable to cause or be affected by material nuisance (e.g. noise pollution) will not compromise the current or future operation of existing uses. This includes ensuring the site is suitable for the proposed use and will not compromise neighbouring uses, the incorporation of measures to attenuate or mitigate existing or potential problems, and giving appropriate regard to the potential cumulative impact of committed developments in addition to existing nuisance sources.
100.	<i>Historic Environment</i>		
101.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	<p>CPP1 Policy CP15 Heritage provides overarching city wide policy reflecting the council’s Conservation Strategy (which was updated in 2015). The policy refers positively to the issue of putting heritage assets to viable use (within the context of prioritising heritage at risk). The council maintains a register of those listed buildings considered to be ‘at risk’ or ‘vulnerable’.</p> <p>CPP2 includes several policies which provide more detail: DM26 Conservation Areas DM27 Listed Buildings DM28 Locally Listed Heritage Assets DM29 The Setting of Heritage Assets DM30 Registered Parks and Gardens DM31 Archaeological Interest DM32 The Royal Pavilion Estate</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>These policies aim to protect the extensive and varied built heritage of the city and to ensure that new development in historic settings contributes positively to its sensitive context, recognising that there will be appropriate opportunities for sympathetic modern design in conservation areas. The specific policy on the Royal Pavilion Estate will help to ensure that the planned restoration and improvement of the historic gardens and buildings is carefully managed through a supportive planning policy.</p> <p>Site specific heritage considerations are also addressed in several of the CPP2 site allocation policies, e.g Policy SA7 and Policies SSA1, SSA5 and SSA6.</p>
102.	<i>Minerals</i>		
103.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	This is not relevant for the City Plan. Mineral and waste policies are set out in the Waste and Minerals Local Plan which is jointly prepared by East Sussex County Council, BHCC and the South Downs National Park Authority.
104.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	As above
105.	Safeguard mineral resources by defining Mineral Safeguarding Areas.	NPPF Para 204	As above

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
106.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	As above
107.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	As above
108.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	As above
109.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 204	As above
110.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	As above.