

BHCC39 - Further Information on CPP2 Implementation and Monitoring Plan targets

The extracts from the CPP2 Implementation and Monitoring Plan (SD04) below include in the final column a commentary against policies where no specific targets/ triggers were set out in the CPP2 Implementation & Monitoring Plan.

This commentary indicates where targets, triggers and actions are not considered appropriate; if the policy does not set out a specific floorspace requirement/ target, where the policy is encouraging not requiring, where the policy allows for exceptions in justified circumstances, or where it is considered that a meaningful target would be difficult to set/collect monitoring data against.

On further consideration, for a number of policies, proposed Main Modification are proposed to provide an updated indicator/ target.

Other updates may be required to the SD04 as a result of main modifications that were discussed at the hearing sessions and will be include in a full updated schedule of Main Modifications/ Additional Modifications.

DM1 - Housing Quality, Choice and Mix		Strategic Objectives: SO4, SO9, SO12, SO19, SO20			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for no Target/ reason for suggested MM
Delivery of housing meeting acceptable space standards	BHCC; developers; Registered Providers	LOI Percentage of residential units permitted¹ meeting nationally described space standards <u>Percentage of residential units permitted not meeting nationally described space standard</u>	No specific target Timescale: Ongoing monitoring through Plan Period	Not applicable	Target is set in the policy but allows for exceptions where justified therefore consider a specific target would not be applicable. Proposed MM: would be easier to monitor exceptions and allows reasons for exceptions to be analysed.
Delivery of accessible and adaptable housing	BHCC; developers; Registered Providers	LOI Percentage of residential units permitted¹ meeting minimum accessibility and adaptability standards set out in Building Regulation M4(2) <u>Percentage of residential units permitted that do not meet</u>	No specific target Timescale: Ongoing monitoring through Plan period	Not applicable	Target is set in the policy but allows for exceptions, where justified. Consider a specific target would not be applicable. Proposed MM: would be easier to monitor exceptions and

		the minimum accessibility and adaptability standards set out in the Building Regulations (M4(2)).			allows reasons for exceptions to be analysed.
--	--	---	--	--	---

DM2 – Retaining Housing and residential accommodation(C3)		Strategic Objectives: SO4, SO9, SO12, SO19, SO20			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for no target/ reason for suggested MM
Retention of existing housing stock	BHCC; developers; Registered Providers	Policy CP1 indicator Single Data List Monitor net additional homes provided per annum (number of homes lost per annum)	No specific target Timescale: Annual monitoring through Planperiod	Not applicable	Net losses taken account of via the CP1 indicator in CPP1 for Housing Delivery.

DM5 - Supported Accommodation (Specialist and Vulnerable Needs)		Strategic Objectives: SO4, SO9, SO12, SO19, SO20			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for no target/ reason for suggested MM
Provision of specialist housing/ accommodation to meet specialist and vulnerable needs	BHCC; Developers; Registered Providers	LOI Number and type of supported accommodation units ⁴ for specialist and vulnerable needs completed annually	No specific target Timescale: Annual monitoring through Plan period	Not applicable	Specific target not considered appropriate because “supported accommodation” covers a range of specialist needs which are monitored through Joint Strategic Needs Assessment. Policy provides a framework to support provision of accommodation which meets identified needs.

Policy DM6 – Build to Rent Housing		Strategic Objectives: SO4, SO9, SO12, SO19, SO20			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for no target/ reason for suggested MM
Provision of Build to Rent housing that contributes to meet identified demand/ need	Developers	LOI Number of build to rent dwellings completed annually LOI Number & percentage of affordable dwellings	No specific target Timescale: Annual monitoring through Plan period	Not applicable	There is no quantified need set out in Policy DM6, provision is market driven. CP19 indicators monitors the overall housing mix

		completed annually as part of build to rent developments			
--	--	--	--	--	--

DM9 - Community Facilities		Strategic Objectives: SO1, SO7, SO9, SO11, SO13, SO16, SO18, SO19, SO20, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Provision and retention of community facilities	BHCC; public and private sector partners; developers; landowners; commercial operators	No specific indicator – requirement for community facilities is addressed through the Infrastructure Delivery Plan (IDP)	No specific target Timescale: Ongoing monitoring through the IDP	Not applicable	Purpose of the Policy is to safeguard community facilities and resist their loss and to support the delivery of new facilities. It is not considered that a meaningful quantitative target for the protection of existing facilities can be set and no quantum of need for new facilities is set out in Policy.

DM10 – Public Houses		Strategic Objectives: SO13, SO16, SO18, SO19, SO20			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Retention of public houses	BHCC; developers; landowners; commercial operators	Number of planning permissions involving loss of public houses to other uses	Target: No specific target	Not applicable	Purpose of the Policy is to safeguard and to resist the loss of viable pubs. It is not considered that a meaningful quantitative target can be set.

			Timescale: Ongoing monitoring through Plan period		
--	--	--	---	--	--

DM15 - Commercial and Leisure Uses on the Seafront		Strategic Objectives: SO3, SO13, SO16, SO17, SO22, SO23			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Maintaining and enhancing the diversity and mix of uses in Special Commercial and Leisure Area	BHCC; Seafront Strategy; landowners; developers; retailers and commercial operators	LOI Number and type of uses on the seafront	No specific target Timescale: Ongoing monitoring through retail health checks	Not applicable	The policy does not seek to retain a specific proportion of the different uses. Supports a range of suitable retail, sport, leisure, cultural and recreation uses.

DM19 - Maximising Development Potential		Strategic Objectives: SO1, SO4, SO7, SO8, SO9, SO10, SO11, SO12, SO13, SO15, SO16, SO19, SO20, SO22, SO23			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Achieving efficient and effective use of land	BHCC; Area Action Plans; area-based SPDs; Urban Design Framework SPD; developers and landowners	No specific indicator - Policy CP14 indicator monitors net density across the city and within defined Development Areas (DAs)	No specific target set Timescale: Ongoing monitoring through Plan period	Not applicable	Not measurable, minimum densities and net densities delivered measured through CP14.

DM25 - Communications Infrastructure		Strategic Objectives: SO12, SO13, SO14, SO16, SO23			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Managing the location and design of telecommunications development	BHCC: telecommunication operators	LOI Appropriate implementation and siting of modern communications infrastructure Appeal success rate for applications where appearance/ impact on setting/ clutter are principal issues.	No specific target 70% <u>appeals dismissed where appearance/ impact on setting/reducing clutter are principal issues</u> Timescale: Ongoing Annual monitoring through Plan period	Not applicable	Proposed Modification to include the following target. 70% of appeals dismissed where appearance/ impact on setting/ reducing clutter principal issues in appeal.

DM34 - Transport Interchanges		Strategic Objectives: SO1, SO3, SO7, SO11, SO14, SO19, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Provision of transport interchanges	BHCC; Local Transport Plan; public transport providers; planning obligations/CIL; developers; landowners	LOI New transport interchange facilities provided	No specific target Timescale: Ongoing monitoring through plan period	Not applicable	Policy is reactive and does not set out specific facility requirements. It is not considered that a meaningful target can be set.

DM36 - Parking and Servicing		Strategic Objectives: SO1, SO7, SO11, SO19, SO20, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Delivery of appropriate parking and servicing provision	BHCC; SDP14 Parking Standards for New Development; developers	Covered under City Plan SA indicator 6 Percentage of development where cycle parking provided Percentage of residential units delivered that are car-free	No specific target Timescale: Ongoing monitoring through Plan period	Not applicable	SA Indicator 6 is reported in the AMR and monitors the percentage of development where cycle parking is provided and any trends in the data. It is not considered necessary to set an additional specific target. The policy does not require developments to be car-free in any specific circumstances so it is not considered appropriate to set a target. For motor vehicle parking provision it would be difficult to identify a specific meaningful target.
DM39 - Development on the Seafront		Strategic Objectives: SO1, SO8, SO10, SO17, SO22, SO23			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM

Ensuring coastal protection	BHCC; Shoreline Management Plan; Coastal Defence strategies; Seafront Strategy; developers; landowners	Policy CP11 indicator <u>Policy SA1 indicators</u> Single Data List Number of planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds	<u>No specific target</u> <u>Targets as per CP11 and SA1</u> Timescale: Ongoing monitoring through Plan period	<u>Not applicable</u> <u>As for Policy CP11 and SA1</u>	Addressed through indicators and targets for CPP1 policy SA1. Targets included as per CP11 and SA1.
-----------------------------	--	---	--	--	--

DM40 - Protection of Environment and Health – Pollution and Nuisance		Strategic Objectives: SO6, SO7, SO8, SO10, SO11, SO12, SO14, SO15, SO16, SO22, SO23			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Preventing adverse impacts on air quality	BHCC; Air Quality Action Plan; developers; landowners	Covered under City Plan SA indicator 2 Extent of air quality management area in Brighton & Hove	No specific target Timescale: Ongoing monitoring through Plan period	Not applicable	SA indicator 2 has no specific target. AMR Appendices final - April 2021.pdf (brighton-hove.gov.uk)

DM41 - Polluted Sites, Hazardous Substances and Land Stability		Strategic Objectives: SO1, SO7, SO9, SO22, SO23			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Avoiding risks to health, safety and/or the environment	BHCC; Contaminated Land Strategy; Health & Safety Executive (HSE); Environment Agency; landowners; developers	No specific indicator Partly covered by City Plan SA indicator 9 Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act	No specific target Timescale: Ongoing monitoring through Plan period	Not applicable	SA indicator 9 has no specific target: AMR Appendices final - April 2021.pdf (brighton-hove.gov.uk)

DM43 - Sustainable Urban Drainage		Strategic Objectives: SO7, SO8, SO14, SO17, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Management of surface water run off	BHCC; Strategic Flood Risk Assessment (SFRA); Sustainable Drainage SPD (when adopted); Southern Water; Environment Agency; South Downs National Park; developers; landowners	Covered under City Plan SA indicator 7 Percentage of new development incorporating SUDS within the development or beyond the development area	No specific target Timescale: Ongoing monitoring through Plan period	Not applicable	Policy requires new buildings/ car parking or hard standing to incorporate appropriate SUDS but allows for exceptions where not reasonably practicable.

DM45 – Community Energy		Strategic Objectives: SO1, SO7, SO8, SO19, SO20, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Reduction of carbon emissions	BHCC; Sustainability Checklist; developers; landowners	LOI Number of developments permitted that incorporate or link to	No specific target	Not applicable	The policy encourages but does not require community energy.

		community energy projects	Timescale: Ongoing monitoring through Plan period		
--	--	---------------------------	---	--	--

DM46 - Heating and Cooling Network Infrastructure		Strategic Objectives: SO1, SO7, SO8, SO19, SO20, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM
Promotion of sustainable energy and reduction of carbon emissions	BHCC; BEIS Heat Networks Delivery Unit; planning conditions/ obligations; developers; landowners	LOI Number of developments permitted that include integrated heat networks and/or communal heating systems	No specific target Timescale: Ongoing monitoring through Plan period	Not applicable	The policy encourages the inclusion of heat and cooling networks and that they should meet certain standards therefore difficult to set meaningful target.
SA7 – Benfield Valley		Strategic Objectives: SO10, SO14, SO15, SO22			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/ reason for suggested MM

Protection and enhancement of designated Special Area	BHCC; landowners	No specific indicator Addressed by Policies DM37, DM38 and H2 Protection of open space & biodiversity will be covered through other monitoring indicators. Improvements to management, public access etc will be recorded.	No specific target	Not applicable Addressed by Policies for Policy DM37, DM38 and H2	Target set under DM37, DM38 and H2.
---	------------------	---	--------------------	--	-------------------------------------

E1 – Opportunity Site for Business and Warehouse Uses		Strategic Objectives: SO1, SO2, SO3, SO20			
Implementation / Issue	Delivery Mechanism / Partners	Indicator Reference / Indicator	Target / Timescale	Trigger and Actions to be taken if target not being achieved	Reason for No Target/reason for suggested MM
Delivery and amount of development	BHCC; landowners; developers	LOI Delivery and amount of development in E1 (to be monitored through Policy CP3 indicators)	No specific target or timescale No consent by 2030	Not applicable Review through City Plan Part One	Whilst policy does not set a floorspace requirement include a timescale and trigger.