Toad's Hole Valley draft SPD

Strategic Environmental Assessment

January 2017

Contents

Appendices

Section 1 Introduction

1.1 Background to this Report

1.1.1 Brighton & Hove City Council is in the process of preparing a Supplementary Planning Document (SPD) for the Toad's Hole Valley site.

1.1.2 As part of the Toad's Hole Valley SPD preparation process, a Strategic Environmental Assessment (SEA) has been undertaken. This report presents the process and findings of the SEA of the Toad's Hole Valley SPD.

1.2 Background to and Purpose of the Toad's Hole Valley SPD

1.2.1 The Toad's Hole Valley SPD provides further guidance in respect of the requirements of the City Plan Part 1 Policy DA7. DA7 identified the area as the location of major mixed-use development to provide a minimum of 700 dwellings and sites for other uses including B1 office, education and open space, as well as ancillary supporting uses. The majority of the site is covered by a Strategic Allocation, recognising the strategic importance of the site.

1.2.2 Policy DA7 indicates the council's commitment to prepare detailed planning guidance for the site. In order to fulfil this requirement, the SPD addresses a range of planning, design and delivery issues. The SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and it does not introduce any new policies.

1.3 Background to and Purpose of the SEA Report

1.3.1 SEA has been undertaken on the Toad's Hole Valley SPD throughout its development. SEA is a tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the SPD. SEA is an iterative process and follows a series of stages (see Section 2). This includes the appraisal of the Toad's Hole Valley SPD against Sustainability Objectives, to encourage the selection of the most sustainable options and to ultimately improve the sustainability of the guidance and the development delivered.

1.3.2 This SEA Report provides a summary of the process and presents the findings and recommendations of the assessment of the Toad's Hole Valley SPD, including the Issues & Options stage assessment and the draft SPD stage assessment. The key aims are to:

- Provide information on the Toad's Hole Valley SPD and the SEA process;
- Present the key existing social, economic and environmental conditions within the Toad's Hole Valley and wider Brighton & Hove area, in the context of existing plans, programmes and environmental protection objectives, together with relevant baseline information;

- Identify, describe and evaluate the likely significant effects of the Toad's Hole Valley SPD; and
- Recommend measures to avoid, reduce or offset any potentially significant adverse effects.

1.4 Structure of this Report

The following table provides an outline of the contents and structure of this SEA Report.

Table 1 Contents and Structure of the SEA Report

Section of SA Report	Outline Content
Non-Technical Summary (separate document)	Summary of the SEA process and SEA Report
1: Introduction	Provides the background to and purpose of the Toad's Hole Valley SPD, the SEA Report and presents the structure of the SEA Report.
2: Strategic Environmental Assessment	Outlines the legal requirements. Provides a summary of the key elements of the SEA process including the methodology for appraising the effects of the Toad's Hole Valley SPD. Provides an overview of the consultation requirements.
3: Appraisal of the Toad's Hole Valley Issues and Options	Outlines the options that were considered at the Issues and Options stage and summarises the appraisal.
4: Appraisal of the draft Toad's Hole Valley SPD	Provides a summary of the appraisal of the individual elements of the draft Toad's Hole Valley SPD against the SEA Framework and sets out the mitigation and recommendations that may be required to minimise adverse effects.
5: Cumulative Impacts & Mitigation	Presents an appraisal of the potential cumulative effects of the SPD
6: Monitoring	Identifies the indicators that could be used to monitor the significant effects of the SPD,
7: Next Steps	Identifies the next steps in the SEA process, following consultation on this SEA Report. Details of how to comment upon this SEA Report are also provided.
Appendix A	Analysis of relevant plans, programmes and environmental protection objectives (initially presented in the Scoping Report).
Appendix B	Baseline data (initially presented in the Scoping Report).
Appendix C	Scoping Report consultation comments and responses.
Appendix D	Options Appraisal
Appendix E	Draft SPD appraisal

Section 2 Strategic Environmental Assessment

2.1 Legal Requirements

2.1.1 There is no longer a legal requirement[1] for SPDs to be subject to Sustainability Appraisal and therefore this appraisal does not meet the requirements of Sustainability Appraisal. The basis for SEA legislation is European Directive 2001/42/EC which was transposed into English law by the Environmental Assessment of Plan and Programmes Regulations (2004), or "SEA Regulations"[2].

2.1.2 The aim of the SEA is to *'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'* (Article 1 of the SEA Directive).

2.1.3 Some plans and programmes are exempt from the SEA requirements. This is dependent on a number of factors, including for example whether the plan will result in significant effects. An initial screening exercise was undertaken at the early stages of the production of the SPD to determine whether an SEA should be undertaken. This concluded a SEA was required without the need to carry out a full screening exercise to determine whether there would be significant effects. This is because it was considered that the SPD falls under the following criteria "*the plan is for town and country planning purposes and sets the framework for future consent of projects listed in Annexes 1 or 11 of the EIA Directive".* This automatically triggers the requirement for SEA without the need for further assessment at screening stage (Regulation 9).

2.1.4 It is understood that there is a degree of interpretation around the wording of this criteria. However, the wording "sets the framework" is considered to be of relevance to the SPD, as although the SPD will not set policy, the SPD will be a material consideration. It is accepted and acknowledged by the council that the policy for the area is set in the City Plan Part 1 and that the SPD will provide further guidance, but not additional policy and will be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.2 Stages in the SEA Process

2.2.1 The SEA Regulations (Schedule 2 and Regulation 12 (2) and (3)) sets out the information that should be provided in a SEA Report as well as requirements for consultation. These are identified in Table 2.

[1] The legal requirement to carry out a Sustainability Appraisal on all SPDs was removed by the Planning Act 2008.
[2] http://www.legislation.gov.uk/uksi/2004/1633/contents/made

Table 2: SEA Requirements

Regulation	SEA Requirements	Relevant Section of Scoping / SEA Report
SCOPING STAGE		
Schedule 2 (1)	An outline of the contents, main objectives of the plan or programme and its relationship with other relevant plans of programmes	Scoping Report: Appendix B: Plans, Policies and Guidance SEA Report: Appendix A: Plans, Policies and Guidance
Schedule 2 (2)	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping Report: Appendix C: Objectives, Indicators & Baseline Information SEA Report: Appendix B: Objectives, Indicators & Baseline Information
Schedule 2 (3)	The environmental characteristics of areas likely to be significantly affected	Scoping Report: Section 4 – Sustainability Issues SEA Report: Section 2 (table 3)
Schedule 2 (4)	Any existing environmental problems which are relevant to the plan or programme including in particular those relating to any areas of environmental importance, such as those designated under Directives 79/409/EEC (wild birds) and 92/43/EEC (habitats	Scoping Report: Section 4 – Sustainability Issues SEA Report: Section 2 (table 3)
Schedule 2 (5)	The environmental protection objectives, established at international, community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Scoping Report: Appendix B: Plans, Policies and Guidance SEA Report: Appendix A: Plans, Policies and Guidance
12 (5)	When deciding on the scope and level of detail of the information that must be included in the report, the responsible body must consult the consultation bodies.	The Scoping Report was subject to consultation for a five week period in February/March 2015. Response can be found in Appendix C of this SEA Report. An updated Scoping Report was published on the council's website.

APPRAISAL STAGE		
Schedule 2 (6)	The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects on issues (a)-(l)[3].	SEA Report Section 3: Toad's Hole Valley Options Assessment Section 4: Appraisal of the draft Toad's Hole Valley SPD and Appendix E Draft SPD Appraisal. Section 5: Cumulative impacts
Schedule 2 (7)	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	SEA Report Section 4: Appraisal of the draft Toad's Hole Valley SPD and Appendix E Draft SPD Appraisal.
Schedule 2 (8)	An outline of the reasons for selecting the alternatives dealt; and A description of how the assessment was undertaken including any difficulties encountered in compiling the required information.	SEA Report Section 3: The Toad's Hole Valley SPD Options, and Section 2: Methodology
Schedule 2 (9)	A description of the measures envisaged concerning monitoring in accordance with regulation 17.	SEA Report Section 6: Monitoring
Schedule 2 (10)	A non-technical summary of the information provided under paragraphs (1) to (9).	A Non-technical summary is provided separately.
13 (2)	The responsible authority shall: (d) invite the consultation bodies and the public consultees to express their opinion on the relevant documents.	This SEA Report and draft SPD will be subject to an appropriate period of consultation.

2.3 Scoping Stage: Plans, Policies & Guidance, Baseline Information and Sustainability Issues

Review of Plans, Policies and Environmental Protection Objectives

2.3.1 A review of plans and programmes and environmental protection objectives that may affect the preparation of the Toad's Hole Valley SPD was undertaken in order to contribute to the development of both the SEA and the SPD in order to meet the following SEA requirements:

- An outline of the contents, main objectives of the plan or programme and its relationship with other relevant plans of programmes
- The environmental protection objectives, established at international, community or Member State level, which are relevant to the plan or

[3] Issues include: (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage and (l) landscape

programme and the way those objectives and any environmental considerations have been taken into account during its preparation

2.3.2 The review helped to identify a number of key messages and issues that could be addressed by the SPD, either directly or indirectly, and also identified sustainability objectives that were carried forward into the Framework that will assess the emerging SPD.

2.3.3 The review included documents prepared at international, national and local level to cover topics as required by Schedule 2 of the SEA Regulations.[4] In addition, some economic issues were also considered. The key principles of relevant plans, programmes and environmental protection objectives were taken forward to positively influence the direction of the Toad's Hole Valley SPD as well as the Framework to assess the emerging SPD. The summary review is presented in Appendix A.

Establishing the Baseline & Identifying Issues

2.3.4 The collection of baseline data was undertaken to allow recent social, environmental and economic issues of the area to be identified. This also helps to provide a basis for predicting and monitoring the effects of the SPD. The collection of baseline data meets the following SEA requirements:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme
- The environmental characteristics of areas likely to be significantly affected
- Any existing environmental problems which are relevant to the plan or programme

2.3.5 The baseline data has been used to identify the key sustainability issues and opportunities within Brighton & Hove. Assessment of the baseline and identification of issues also helps to define the Framework used to assess the emerging SPD. A detailed description of the baseline is provided in Appendix B. A summary of the sustainability issues is presented in Table 3.

[4] Topics (a) to (l) as described under Footnote 3.

Table 3: Sustainability Issues in Brighton & Hove

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
Ecological Footprint	• Brighton & Hove's ecological footprint is higher than the regional and national average. • Households, including energy consumption, account for 23% and the transport sector accounts for 19% of the total. • 26% of the city's ecological footprint relates to food (also known as the city's 'foodprint'). • The overall aim of the council's Sustainability Action Plan is to reduce the ecological footprint of the city.	• The SPD could contribute towards reducing ecological footprint through achievement of high building standards and promotion of low/zero carbon energy sources. • The SPD could contribute towards reducing ecological footprint through the promotion of sustainable travel choice • The SPD could also contribute towards this through ensuring the necessary infrastructure and services are in place to reduce transport movements and support the creation of a sustainable community.
Climate Change	• Climate change impacts in the south east include: water resources, water quality, biodiversity, health, buildings and infrastructure. • By the 2020s the south east is anticipated to have increased average temperatures, less rainfall, drier soils and an increase in extreme weather events. • A total of 4.6 tonnes/capita of CO2 in total were emitted in 2012. This amount has reduced over the last ten year period and is lower than the South East and England averages. • Emissions from energy used by the domestic sector contribute significantly to total amount (43% in 2012) and is higher than the South East and England average. • 24% of carbon emissions in 2012 in Brighton & Hove were from	• The SPD could contribute towards reducing domestic sources of carbon emissions through promotion of energy efficient building design, including through the style of housing delivered, siting and layout, and through promotion of low/zero carbon sources of energy, including decentralised energy • The SPD could contribute to reducing transport related carbon emissions by supporting the creation of a sustainable community, by promoting more sustainable forms of transport, through

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	transport sources. • The Sustainability Action Plan sets a target for the council of a 4% reduction in carbon emissions each year and sets various targets for the rest of the city.	the support of emerging technologies that could be powered by renewables (e.g. electric vehicles), as well as through provision of infrastructure that encourages sustainable travel, such as cycle parking, and improvements to the pedestrian and public transport network. • The SPD will need to ensure that the development is resilient and adaptable to long term changes in climate, including minimising over-heating through housing design.
Air Quality	• Pollutants emitted from road traffic (NO2 and PM10) are the greatest contributing factor to poor air quality in Brighton & Hove. • Exceedences in the EU Annual Air Quality Objective for NO2 have led to the designation of an Air Quality Management Area in Brighton & Hove, with the recently declared AQMA 2013. • AQMA 2013 is a quarter of the size of the AQMA 2008, however it does include two new areas that were previously outside the AQMA: Preston Road and Rottingdean High Street. It does not include the Toads Hole Valley site and the THV site is not in close proximity to the AQMA. • Monitoring over the last 10 years show little improvement in levels of NO2 in central locations, although there have been improvements in areas that are situated outside the AQMA. • Despite its proximity to the A27, air quality across the Toads Hole Valley site is likely to be good. This is likely to be due to	• The SPD could contribute towards maintaining air quality through encouraging opportunities for sustainable travel. • Development in this location is unlikely to directly impact upon the AQMA, however the SPD will need to take into account any indirect effects on the AQMA caused by an increase in traffic at this location or on nearby roads and junctions that join the site to roads within the AQMA. • The SPD should consider how any potential adverse air quality impacts on the new community, resulting from traffic using the A27 bypass as well as other adjacent roads could be reduced, e.g.

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	the generally good traffic flow along the road and the nature of the landscape which enables air pollutants to be readily dispersed.	through soft landscaping and the appropriate siting of development, considering any sensitive receptors.
Transport and travel	• The city is well-connected. It incorporates roads that form part of the Strategic Road Network (A259, A23, A27), has an extensive bus network, includes rail stations that link the city to London and the South East and includes a number of routes on the National Cycle Network. • Congestion and high numbers of vehicles on the roads is an issue in the city and can be detrimental through causing delays to emergency services, buses and goods deliveries, as well as having a negative impact on the economy, and directly impacting on road safety and health. • The A27 north of Brighton can get particularly congested at peak periods. Increasing amounts of development across the city could have a cumulative impact on the road network. • The City Plan Infrastructure Delivery Plan (2013) indicates that junction improvements at the Devil's Dyke roundabout will be required in order to facilitate development at Toad's Hole Valley. • High levels of road traffic also have a direct impact on road-related noise, prolonged exposure to which can have a detrimental impact on health and quality of life. • The Toads Hole Valley site is adjacent to the A27 and near to a junction leading onto the A27. The King George VI Avenue runs in a south-easterly direction along the south-east side of the site and is one the main routes into the Central Hove area. It is of steep gradient and is prone to accidents and is	• The SPD should promote more sustainable forms of transport, including through improvements and links to the existing cycle and pedestrian network, through facilitating improvements to local bus network, including both north/south and east/west movements, and through improving local access to nearby services. • Improvements will need to take into account the issues associated with the adjacent road, including safety, as well the steepness of the SNCI. • The SPD should refer to the need for junction improvements to be completed prior to occupation. • Connectivity throughout the site should facilitate movements on foot. • The SPD could have some influence over travel choice and car ownership, for instance through limited availability of on site parking provision, through ideas such as edge-of-site parking or through the inclusion of car-free

Environmental Issues		
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	considered to be a barrier in terms of access. • There are no public rights of way or bridleways within the site. However a bridleway/National Cycle Route 82 is adjacent to the southern end of the site and links the SDNP into Hove through Hangleton on the Monarch's Way. However, links to the NCN and adjacent community via the SNCI are limited due to the steep nature of the SNCI. • Various bus routes serve the adjacent Hangleton & Goldstone Valley neighbourhoods, linking them to Hove and Brighton. An extension to an existing bus route, or new bus route would be required in order to maximise sustainable transport options available. Any bus route would need to be commercially viable at various times of the day • The Census 2011 indicates that 37% of the working age population travel to work by car. This is significantly less than the England average of 57%. In the Hangleton & Knoll ward, the percentage of working aged population who travel to work by car is 54%, possibly reflective of the out-lying nature of this ward with less sustainable transport provision than more central areas. The percentage from Hangleton & Knoll who travel to work on foot or by bike is 15% compared to 26% across Brighton & Hove. Similar patterns of travel to work can be seen in the adjacent Hove Park ward. • Both the Hangleton & Knoll and Hove Park wards have higher levels of car ownership than the Brighton & Hove average (62%), at 72% and 87% respectively.	housing units. • The SPD should look at other opportunities which would lead to a less car-dominated environment. • The SPD should ensure that day-to-day needs of residents, including residents from adjacent neighbourhoods, can be met through facilities and services on site to support the creation of a sustainable community.
Flood Risk	• Parts of the city are at risk from tidal flooding, surface water flooding and groundwater flooding. All types of flood risk	• The SPD should help to reduce surface water flood risk that can result from

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	increase when climate change is taken into account. • The site is located in Flood Zone 1. There are no flood defences on site. • The SFRA 2012 indicates that the southwestern edge of the THV site may be susceptible to surface water flooding, however the BH Surface Water Management Plan 2013 does not indicate the site to be as a "hotspot" and is therefore not an area where significant historic cases of flooding have occurred. • The Environment Agency's updated Flood Map for Surface Water (uFMfSW) also indicates that parts of the site are indicated to be at high risk of surface water flooding. • The SFRA indicates that the site is not at risk of groundwater flooding. This is confirmed by the EA Groundwater Susceptibility Map. • The SFRA and SWMP are based on the site in its current form (e.g. undeveloped Greenfield) therefore the risk of flooding could change once the site becomes urbanised. • The site is located at the top of a valley system, any development that does not consider the potential impact of increased surface water run-off will result in an impact downstream of the development	urbanised development through implementation of sustainable drainage techniques across the site. • The SPD should take into consideration the results from the SFRA and any subsequent flood risk documents in the design and siting of development. • Any development on this site will require a Flood Risk Assessment to support a planning application. It is vital that sustainable drainage is considered from the beginning and incorporated into the SPD at the earliest stage. • SPD should ensure that peak run-off and volume control meet the recommended standards for Greenfield sites. • Any future development should ensure that it would not increase the surface water flood risk elsewhere.
Water resources	• A significant proportion of the city overlies the Brighton Chalk Aquifer. • The groundwater quality in the Brighton Chalk aquifer is at risk of deterioration from nitrates and pesticides, relating to rural as well as urban inputs; and is at risk of saline ingress from the sea and other rivers. • Construction works of any kind have the potential to	• The SPD should address water quality through consideration of drainage and the impacts of the creation of hard surfaces on water absorption and surface water run-off. • The SPD should ensure high sustainability standards are required

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	contaminate the aquifer, as does pollution associated with surface water runoff. • Recharge of the aquifer may be adversely affected by urbanisation. • The overall status of the Brighton Chalk Aquifer is poor and various measures will need to taken to ensure the groundwater resource reaches good status, as required by the Water Framework Directive. • The South East has been declared as an area of water stress.	from development, assisting in the reduction in levels of water consumption from future development and should aspire to be water neutral. • The SPD should maximise opportunities for biodiversity/green infrastructure, as a method of helping to reduce the risk of flooding.
Biodiversity	• A Local Biodiversity Action Plan has been adopted which sets out action plans covering species and habitats that are of importance. • The city contains various designated sites, including Castle Hill in the east of the city which is a Special Area of Conservation, a Site of Special Scientific Interest and a National Nature Reserve. • The Brighton to Newhaven cliffs is also an SSSI. • There are a number of declared and proposed Local Nature Reserves throughout the city. • There are 62 Sites of Nature Conservation Importance. • Designated sites contribute to the Green Network, in addition to other areas of open space across the city, which provides numerous ecosystem services and supports the movement of biodiversity. • The Toads Hole Valley site includes an SNCI on its western boundary which forms a steep bank rising up to the adjacent residential area in Hangleton. It was designated in 1995 and in 1999 a site survey described the site as “an important site for	• The SPD should refer to local adopted planning policies that aim to protect existing biodiversity on a site (including the need for an Ecological Assessment in accordance with SPD11) • The SPD should increase biodiversity throughout development, for instance through biodiverse roofs and walls on buildings, supporting new connections to the Green Network and ensuring future climate adaptation. • The SPD should provide opportunities to protect any important features of the SNCI and enhance its value through appropriate management, as well as considering links to local habitat networks. • The SPD should provide opportunities for greater involvement in nature

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	habitat diversity with scrub, woodland, rough grassland and a pond". The SNCI forms part of the local Green Network. • The city, along with local partners have achieved Biosphere Reserve designation for the city and surrounding area.	conservation, helping to meet the objectives of the Biosphere Reserve, through improved access to and greater understanding of the SNCI and local ecology.
Landscape	• The South Downs National Park covers approximately 40% of the administrative area of Brighton & Hove. • The elevated nature of the Downs provides extensive views over areas beyond the defined National Park boundary. Care therefore needs to be taken to ensure that development outside the designated boundary does not adversely affect the character of the National Park. • The SDNPA is a Dark Sky Reserve. • The Toads Hole Valley site is adjacent to the SDNP, separated by the A27.	• It is essential that the surrounding landscape character, setting and purpose of the National Park is enhanced and protected through careful siting, high quality design and soft landscaping. • Views of and from the Downs should be protected. • The SPD could enhance access to SDNP through improved access points, or links to nearby bridleways and cycle paths that already link to the SDNP. • SPD should ensure the impact of lighting on the SDNP is considered, e.g through promotion of techniques such as low-reflective surfacing and lighting orientation.
Open Space and Green Infrastructure	• Green infrastructure and open spaces provide a variety of benefits, including provision for recreation as well as providing numerous ecosystem services. • The Open Space, Sports and Recreation Study 2008/09 and updates, found there was an existing shortfall across the city (measured against 2006 population levels) in certain typologies	• The Toads Hole Valley site covers a large area and is probably one of few development sites in the city where some of the open space needs of the new population of the development could be met on site.

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	and did not identify any surplus open space. • The updated study in 2010 showed there to be significant variation in the supply of open space at ward and sub-ward levels, with only 2 wards meeting their existing open space needs. • Significant additional amounts of open space across the city will be needed in order to meet the needs of the predicted increase in population as well as to meet the existing population's needs. • The Open Space Study suggests it is unlikely that open space needs can be met "on-site" due to size of sites. • The city has about half the number of recommended allotment plots. The total number of plots at the beginning of 2011 was 2,795, which is 10.9 per 1,000 people. • The THV site is located within the Hangleton & Knoll ward which was found to be deficient in the following typologies: children's play space and allotments.	• The SPD should ensure that any local deficiencies in open space are addressed, in accordance with the Open Space Study, including opportunities for food growing and that open spaces are sited to gain maximum benefit from the new and existing adjacent communities and to meet local accessibility standards. • The SPD should look at opportunities to maximise the use of available space, through the sharing of resources and dual-use where appropriate. • The SPD should look at opportunities to increase provision of green infrastructure and connect to the existing green network.
Cultural Heritage & Townscape	• The city has an extremely attractive historic urban environment. • The historic built environment of Brighton and Hove, particularly its rich Regency and Victorian legacy, is recognised of being of regional importance. • Historic buildings are an important cultural asset, contributing to positive visitor experience and tourism revenue, which is important to the local economy. • There are 34 Conservation Areas throughout the city, including Woodland Drive which is adjacent to the north-east edge of the Toads Hole Valley site. • The site has been identified as having potential for	• Due to the site's location, the SPD's influence on protecting and enhancing the city's historic built environment will be minimal. However any development at the northern edge of the site will need to be mindful of impacts on the nearly Woodland Drive Conservation Area, particularly the "Three Cornered Copse" which forms the northern extent of the Conservation Area. • SPD should ensure that any

Environmental Issues		
Issue/SEA topic	**Nature of the issue across the city and in the Toads Hole Valley area where relevant.**	**Opportunities for the SPD, or how it will need to take it into account**
	undesignated buried archaeological remains.	undesignated heritage assets are assessed prior to any development work. • The SPD will provide the opportunity to create a strong sense of place through high quality design.
Waste	• Local Authority Collected Waste (LACW) which includes household waste makes up around 21% of waste in the East Sussex and Brighton & Hove area. • Construction, demolition and excavation waste is estimated to make up around 51% of total waste arisings in the East Sussex and Brighton & Hove area. • Transportation of waste is an issue, and there is a need to manage waste close to its arising.	• SPD should maximise the use of resources, e.g. through shared space, and building design (e.g. teraccing) where appropriate. • SPD should ensure provision for waste storage and collection, including composting, in accordance with the waste hierarchy. • SPD should promote the reuse of any excavation waste on site where possible. • SPD should promote re-use of construction waste. • SPD will need to take account of and refer to local waste adopted policy.

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
Demographics	• Census 2011 showed the resident population of Brighton & Hove to be 273,400	• The mix, type and amount of housing delivered will be the main influence on

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	• There is a significant difference in the amount of people in the 16-44 age range compared to the national average, which totals 48% of the population, compared to 35% nationally. • At the time of the Census, 20% of residents were from a BME background. The greatest proportion of BME residents identify as "other white" at 36% of the BME population and 7% of the total population and is higher than the England average. The city has fewer Asian or Black residents than the England average. • The Toads Hole Valley site is situated within the Hangleton & Knoll ward in the northern edge of the city. It is adjacent to the Hove Park ward. • At the time of the Census, the population of Hangleton & Knoll was 14,744 people comprised of 6010 households. The population of Hove Park is 10,602 people comprised of 4086 households. • Both the Hangleton & Knoll and Hove Park wards have a higher amount of under 16s, a higher amount of over 65s and a lower amount of 16-44 year olds than the Brighton and Hove average.	the demographic makeup of the new population. Development in this location could therefore alter the existing population demographics of the Hangleton & Knoll ward, particularly as it could potentially increase the number of households by 11% (based on 700 homes) and will also influence the type of services required by residents. • Based on local existing demographics and the City Plan Infrastructure Development Plan, education and health facilities are likely to be required in this location.
Housing	There are a number of issues related to housing: • Brighton & Hove has the highest overcrowding rate outside London (17.1% compared to 8.7% Eng average). • In 2013 the average cost of a property was over eight times a person's average income in the city • A larger proportion of residents rent their property in Brighton & Hove compared to the England average (30% compared to	• The SPD will contribute to meeting the wider housing needs of the city. • The SPD should ensure that a range of different types of housing is delivered appropriate to the location and to meet a wide range of local needs including affordable housing, family-type

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	17%) • The overall housing need for the city for the period 2010-2030 has been assessed at between 18,000-24,000 new homes • The Assessment of Affordable Housing Needs 2012 indicates over 22,000 households will have a need for an affordable home in the 2012-2017 period. • Brighton & Hove has a large student population, many of which are housed in Houses in Multiple Occupation. • The over-crowding rate is lower in Hangleton & Knoll than the local and national average.	housing, and extra-care housing. • The SPD should ensure that the housing densities delivered make the best use of the site, in addition to meeting other policy requirements.
Deprivation	• Brighton & Hove is ranked the 66th most deprived authority out of 326 in England using the 2010 Indices of Deprivation. • Over half of the city's population (55%) lived in some of the forty percent most deprived areas of England in 2010 and 23% lived in the twenty percent most deprived (overall deprivation). • 19 of the 164 Super Output Areas ranked in the city are in the ten per cent most deprived in England. • 2 Super Output Areas within the Hangleton & Knoll ward are within the 5-10 percent most deprived in England (overall deprivation) and ranked 14th and 15th most deprived in the city. This includes the SOA that includes the Toads Hole Valley site. In this SOA in particular the following domains contribute to deprivation: income, employment and health, as well as sub-domains of skills and living environment. No areas within the Hove Park Ward are within the most twenty percent deprived in England. • Child poverty varies greatly across the city. In Hangleton & Knoll, 22% of children are defined as living in poverty (living in	• Deprivation is a complex issue and various issues need to be tackled in order for levels of deprivation to improve. The SPD could help to provide employment opportunities for local people, leading to improved skills and income, and through improved access to health facilities. However this is dependent on local take-up.

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	households in receipt of out of work benefits). This is higher than the Brighton & Hove and England average (18% and 19% respectively.) Only 6% of children in Hove Park have been defined as living in poverty.	
Health	• Across the city, male life expectancy is slightly lower than the national average (6 months lower) and female life expectancy is the same as the national average (in BH 78 and 83 years respectively). • Although obesity levels are better than the England average, 20.2% of adults are obese, 8.2% of children in reception year were found to be obese and 15.2% of year 6 pupils were found to be obese. • Poor diet and lack of physical activity lead to an increased risk of coronary heart disease as well as leading to certain cancers and diabetes. It is a factor in the difference in life expectancy of up to 10 years between the most and the least affluent areas of the city. • Research indicates that close access to open/green space has a positive influence on health. • The majority of deaths in the city are attributable to cancers, circulatory diseases, respiratory diseases and digestive diseases. • Health inequalities exist throughout the city, with those living in the most deprived areas of the city on average living 6-10 years less than those in the least deprived areas. • Life expectancy for women in both the Hangleton & Knoll and	• Health is strongly linked to provision of decent housing, as well as meaningful employment, therefore the SPD will provide the opportunity to influence some of the wider determinants of health. • Health facilities provided in this location should also help to meet the wider needs of adjacent neighbourhoods. • The SPD could provide opportunities for sustainable and active travel, both of which have multiple health benefits. • Opportunities for recreation provided in the area could also benefit adjacent communities and some local health issues. • The SPD could influence and deliver many of the wider determinants of health (e.g. housing, employment, recreation, open space), which as well as having health benefits would also help to deliver a sustainable community.

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	Hove Park wards is higher than the Brighton & Hove average. Life expectancy in men is the same as the BH average in Hangleton & Knoll and higher in Hove Park ward. • In Hangleton & Knoll, 10% of the population's day to day activities are limited a lot by a health issue. This is higher than the BH and England averages of 7% and 8% respectively. This is also higher than Hove Park ward (6%). • 20.5% of children at yr 6 in the Hangleton & Knoll ward were found to be obese. This is higher than the BH (15.5%) and England average (19%) and is the second highest ward in the city for yr 6 obesity. 27.3% of adults in this ward were found to be obese. This is also higher than the BH and England average and is the third highest ward in the city. Yr 6 and adult obesity in Hove Park ward is lower than the BH (20.4%) and England (24.1%) average. • The need for health facilities in this location has been identified in the City Plan Infrastructure Delivery Plan.	• The SPD should promote design that minimises over-heating in housing, e.g. through passive design, passive ventilation, shading etc and support the use of natural materials that moderate temperatures.
Crime	• There were 134 crimes per 1000 population in Brighton & hove 2013/14. • In 2013, 96 per cent or more people said they felt very or fairly safe in their local area or outside in the city centre during the daytime in 2013. However, the proportion decreased to 80 per cent feeling very or fairly safe in their local area after dark and only 63 per cent felt safe in the city centre after dark. • Some crimes are an issue in certain parts of the Hangleton & Knoll ward including anti-social behaviour and violent crime however the crime rate over the 2013/14 period was 80/1000	• The SPD will provide the opportunity to design out crime, through promoting opportunities for natural and passive surveillance. • The SPD should ensure a balanced mix of housing types is delivered across the site. • Community engagement could help to facilitate wider community ownership and potentially help to tackle any future

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	population and therefore lower than Brighton & Hove and England averages. Burglary and vehicle crimes are an issue in certain parts of the Hove Park ward.	anti-social behaviour, particularly between adjacent neighbourhoods.
Noise	• Noise can be a significant issue in built up urban areas, which can act as a disturbance but can also act as a threat to human health. Noise guidance provided by the World Health Organisation states "general daytime outdoor noise levels of less than 55 decibels are desirable to prevent any significant community annoyance." • The main generator of background noise in Brighton & Hove is road traffic. DEFRA noise mapping study indicate that there are many areas within the city where noise (from road traffic) exceeds the WHO guidelines, with some areas around major road junctions actually exceeding 75 db. • The Noise Action Plan (2010) seeks to manage noise issues and effects and identified that approximately 2,250 dwellings (4,100 people) within 'important areas' required further investigation for potential action because of the effects of road traffic noise, and of these, 1,400 dwellings (2,600 people) were a 'first priority'. • For each 'Important Area' the highway authority should consider what, if any, actions might be taken. This should include exploring the scope for erecting noise barriers; installing low noise road surfaces; local traffic management measures; or improving sound insulation. • The Defra road mapping did not include the Toads Hole Valley site, although similar locations in close proximity to the A27 indicate noise levels of around 65-69 decibels along the	• The potential for noise impacts from the adjacent A27 should be considered in the siting of development, with soft landscaping and other techniques used to help absorb traffic noise where possible. • Noise impacts from the adjacent King George VI Avenue must be considered, particularly towards the southern end of the site. • SPD could include opportunities for reducing noise on any new roads built as part of the development, through the use of measures, such as barriers that help to reduce traffic noise, as well as through the location of any sensitive receptors.

Social Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	boundary with the A27. The mapping did include the King George VI Avenue, where noise was mapped at over 75 decibels in some locations, particularly around the junction with Goldstone Road and Nevill Avenue. A site visit indicated the severity of the road-traffic noise.	

Economic Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
Economy	• GVA per head remains below national and regional average and suggests that there is scope for Brighton & Hove to have a more productive economy, e.g. by creating more jobs in businesses and sectors that produce more value per worker. • The city is a regional centre or 'hub' for shopping and employment and a subregional centre for health services. It has a strong retail market share across the immediate surrounding area, but over one third of people shopping in Brighton & Hove also live in the city. • Over three quarters of local employment is based in the business and financial services, retail and hospitality and public sectors. • The city also benefits from a thriving creative and digital industries sector • Unlike many other coastal cities, the local economy does not solely depend on the visitor economy • The infrastructure supporting the local food supply chain is not as advanced as in some regions which have developed local	• The SPD will have limited influence over the wider economy but could contribute to improvements in the economy through increased employment floorspace and opportunities. • The additional residents in this location will also create the need for local services and facilities, such as local shops and community facilities, which will be required in order to create a sustainable community.

Economic Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	distribution centres, established cooperative wholesalers and invested in local processing (e.g. mills or abattoirs).	
Employment and skills	• According to the Census 2011, 31,915 people commute into the city for work and 37,310 people commute out the city for work every day. • In 2013 71% of residents were in employment. • At the time of the Census 2011 61% of the 16-74 age population in Hangleton & Knoll were in employment. This is similar to both the BH and England average (62%). 67% of the 16-74 year old population • At the time of the Census 2011 4% of the 16-74 working age population in Hangleton & Knoll are unemployed. This is similar to the BH and England averages (4%) but higher than Hove Park ward (2%) • In Brighton & Hove 16% of the population over 16 have no formal qualifications, which is lower than the England average of 22% • GCSE attainment (measured by average point score per pupil) is lower in Brighton & Hove than the England average (443 compared to 468) • In Hangleton & Knoll 27% of over 16s have no formal qualification. This is higher than the Brighton & Hove and England average (16% and 22% respectively). In Hove Park 13% have no qualifications. • GCSE attainment (measured by average point score per pupil) is lower in the Hangleton & Knoll ward than the BH and England average. Attainment in Hove Park is higher than the BH but lower than the England average.	• The SPD could provide employment opportunities at both construction and operational stages. • The SPD could promote the use of local labour. • The provision of employment uses on site will contribute towards helping to the city's need for employment floorspace. • The SPD should ensure that transport is not a barrier to people wanting to access education, employment or training and that the existing topographical issues and other issues that act as a physical barrier to movement are over come • Local school provision supports the creation of sustainable communities. The SPD needs to consider the increasing need for school places from existing as well as new communities.

Economic Issues		
Issue	**Nature of the Issue**	**How the SPD can influence the issue, or how it will need to be taken into account**
	• Provision of school places is an issue in the west of the city. Primary school provision in Hove has increased substantially over recent years with a new annexe to an existing school, as well as permanent and temporary increases to individual schools' intakes. There is some capacity at nearby West Blatchington Primary School, although this is physically separated from the Toads Hole Valley site by a steep bank. Additional secondary school places will be required in Hove in future to meet the increased primary places that have been provided.	

Scope of the Appraisal

2.3.6 The SEA process commenced in 2015 with the preparation of a Scoping Report for the Toad's Hole Valley SPD, the report contained:

- A review, based on the City Plan Part 1, of relevant plans, programmes and environmental protection objectives that could influence the SEA and the development of the Toad's Hole Valley SPD;
- A review of baseline data;
- An initial identification of key sustainability issues and opportunities; and
- The development of the Framework against which the elements of the Toads' Hole Valley SPD have been assessed.

2.3.7 The Scoping Report set out the scope and approach to the assessment of the Toad's Hole Valley SPD. Geographically the scope of this SEA comprises the Toad's Hole Valley site as well as the adjoining area within which the site is located. The spatial extent of the SPD's likely impacts may, in some cases, be only local to the site in question whereas in other cases the impacts of the site may be felt over a wider area.

The Scoping Consultation

2.3.8 The Scoping Report was issued for public consultation in February 2015, for a five week consultation period. The aim of this was to obtain comment and feedback upon the scope and level of detail of the SEA. The scoping comments and responses are included in Appendix C.

2.3.9 It was issued to the three statutory consultees (the Environment Agency, Historic England and Natural England). It was also sent to consultees which had previously responded to consultations on the Toad's Hole Valley site, and the public through availability on the Council's website. The report was subsequently updated following this consultation feedback and was re-published on the council's website.

The Framework

2.3.10 The Framework underpins the assessment methodology and comprises a series of Sustainability Objectives (covering social, economic and environmental issues) that are used to test the performance of the plan being assessed. Whilst the SEA Directive does not require the use of Sustainability Objectives, they are a recognised tool for undertaking the assessment. The Objectives are based on those that were used to assess the City Plan Part 1 and address a cross-section of environmental, economic and social sustainability issues.

2.3.11 The Sustainability Objectives were developed using the review of other relevant plans, programmes and environmental objectives, the baseline data and the key issues and opportunities. They were originally developed during preparation of

the Core Strategy. The Objectives have since been reviewed to reflect the Toad's Hole Valley SPD, with some being deleted and others being amended.

2.3.12 Table 4 presents the Objectives that were used in the assessment of the SPD and its options. Each of the Sustainability Objectives is supported by a number of sub-objectives / decision-making criteria to add further clarity and to assist the assessment process.

Table 4 Sustainability Framework

Sustainability Objective	**Potential Sub-objectives / Decision Making Criteria Will the option or policy…**
1. To prevent harm to and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.	• Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species. • Increase access to biodiversity/nature for local people. • Provide opportunities to achieve a net gain in biodiversity • Recognise the multi-functional benefits of ecosystem services provided by green infrastructure • Improve links between existing and/or new green infrastructure NB: there is not considered to be any risk to nationally or internationally designated sites from development in this location, therefore, a criteria which determines this is not considered to be relevant.
2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning.	• Minimise the causes of air pollution • Support the development of cleaner technologies (e.g. low-emission vehicles) • Consider the potential for impacts from existing sources of air pollution • Take account of Air Quality Management Areas
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and their settings and archaeological sites effectively.	• Conserve the historic environment and its settings. • Respect, maintain and strengthen local character and distinctiveness • Promote high quality design that establishes a strong sense of place • Contributes to meeting the city's open space, sports and recreation requirements • Improve the quality or make better use of existing open space • Improve sustainable access to existing or new open space • Encourage the incorporation/creation of green/public/food-growing space within development

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy…
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.	• Protect the landscape character and special characteristics of the SDNP and its setting, including its Dark Skies status • Protect and enhance important views to and from the SDNP • Encourage sustainable access to the SDNP • Promote sustainable tourism to the SDNP
5. To meet the need for decent housing, particularly affordable housing.	• Increase the availability of affordable housing • Provide a mix of housing types, sizes and tenures. • Address the housing needs for all sections of the community such as students, older people, disabled people, families, gypsies and travellers, and smaller households as appropriate to the location.
6. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed use, car-free and higher-density development.	• Encourage mixed-use development and delivery of sustainable communities that reduce the need to travel • Encourage the location of development close to where use of sustainable transport can be maximised • Improve public and sustainable transport infrastructure • Encourage health-beneficial forms of transport including cycling and walking • Improve road safety to encourage cycling and walking • Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations • Protect and enhance public rights of way
7. Minimise the risk of pollution to water resources in all development.	• Encourage remediation of despoiled, degraded or contaminated land • Improve water quality, including groundwater • Direct more vulnerable forms of development to areas of lower flood risk (all sources of flooding) • Incorporates measures to reduce flood risk including sustainable drainage solutions • Ensure development does not increase the risk of flooding elsewhere
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the	• Reduce water consumption • Maximise re-use of waste-water • Conserve and maintain water resources • Encourage development to meet environmental standards

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy…
environment.	
9. To promote the sustainable development of land affected by contamination.	• Encourage remediation of despoiled, degraded or contaminated land • Encourage implementation of sustainable drainage solutions • Reduce the risk of surface water run-off
10. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment.	• Increase the quantity and quality of employment opportunities in a range of different sectors. • Provide employment opportunities for local people • Provide opportunities for local people to learn new skills
11. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors.	• Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace • Support existing, new and emerging sectors • Enable the growth of high value, low carbon business • Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment.
12. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap between those with the poorest health and the rest of the city.	• Encourage and facilitate walking and cycling • Improve access to open space, the countryside and other opportunities for physical activity • Improve environmental quality and therefore minimise adverse impacts on health from various forms of pollution • Improve access to health facilities • Reduce health inequalities • Consider the needs of all members of the community, particularly the needs of those with protected characteristics
13. To integrate	• Facilitate improvements in community safety

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy…
health and community safety considerations into city urban planning and design processes, programmes and projects.	• Promote design that seeks to minimise crime • Promote design that seeks to improve road safety
14. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.	• Improve access to education, life-long learning and training opportunities, • Improve access to open space and opportunities for health-promoting forms of recreation • Improve access to employment opportunities and contribute towards a reduction in unemployment • Encourage the development of mixed communities
15. To engage local communities into the planning process	• Provide opportunities for local communities to be involved • Take into consideration ideas put forward by the community
16. To make the best use of land available	• Maximise efficient use of the site through high density development where appropriate • Maximise efficient use of the site through innovative design • Maximise efficient use of the site through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings/space etc. • Promotes the retention of some ecosystem services provided by Greenfield sites
17. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings.	• Encourage renewable energy generation • Encourage low/zero carbon development • Encourage energy efficient design • Facilitate development of decentralised energy networks • Encourage development to meet environmental standards
18. To ensure all developments have taken into account the changing	• Considers the potential risks and consequences of flood risk and does not increase flood risk elsewhere • Incorporates sustainable drainage techniques, including those that have benefits for biodiversity.

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy…
climate and are adaptable and robust to extreme weather events.	• Incorporates features that may help to maintain temperatures, such as green roofs, tree-planting and so on and recognise the services provided by ecosystems and green infrastructure. • Incorporates features to maximise efficient use of water resources.
19. To encourage new developments to meet adopted sustainable building standards.	• Encourage development to meet sustainable building standards Also, see Objectives 8 and 18
20. To promote and improve integrated transport links and accessibility to health services, education, jobs and food stores.	• Increase provision of key local services, including health, education, retail and community facilities. • Improve access to existing local services. • Enable communities to meet their day-to-day needs locally
21. To reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, business and initiatives that promote these and other sustainability issues.	• Promote building design that is resource efficient • Promote the use of secondary and recycled materials • Promote waste reduction, re-use, recycling and recovery • Facilitate improved accessibility to recycling and other waste management facilities

2.4 Assessing Options and Identifying Effects

2.4.1 A Toad's Hole Valley SPD Issues and Options paper was produced and made available for consultation in March and April 2016. This set out the various issues that needed to be addressed by the SPD, as well as options for each issue which can be summarised as follows:

- City Plan only
- Broad brush SPD
- Detailed SPD

2.4.2 The options were considered to be reasonably distinctive and were drafted to stimulate early stakeholder consultation rather than be reflective of policy.

2.4.3 An assessment was carried out to appraise each of the options against the Framework. Each option was assessed against the Sustainability Objectives and recommendations were made on how each option may improve in sustainability. Each option was appraised by examining the effects on the current baseline or its contribution towards meeting targets or statutory requirements. The appraisal attempted to identify the most sustainable options for each of the issues. The full results of this are presented in Appendix D and are summarised in Section 3.

2.4.4 Table 5 sets out the methodology used.

Table 5: Key to Methodology Used

Strong Positive Impact	The option/draft SPD strongly supports the achievement of the Sustainability Objective.	**+ +**
Positive Impact	The option/draft SPD partially supports the achievement of the Sustainability Objective.	**+**
Neutral/ No Impact	There is no clear relationship between the option/draft SPD and/or the achievement of the Sustainability Objective or the relationship is negligible.	**0**
Positive and negative outcomes	The option/policy has a combination of both positive and negative contributions to the achievement of the Sustainability Objective.	**+/-**
Uncertain outcome	Not possible to determine the nature of the impact. The impact may depend heavily upon implementation at the local level or further information. More information is required to assess the impacts.	**?**
Negative Impact	The option/draft SPD partially detracts from the achievement of the Sustainability Objective.	**-**
Strong Negative Impact	The option/policy strongly detracts from the achievement of the Sustainability Objective.	**- -**

2.5 Assessing the effects of the draft SPD

2.5.1 Following on from the Issues and Options consultation and Strategic Environmental Assessment, a draft SPD was produced and has been appraised against the Framework using the same methodology as set out in Table 5. The appraisal follows the specific topic headings of Section 6 – Development Response of the SPD as follows:

- Quantum of Development

- Masterplanning and landscape-led design
- Place making
- Housing
- Office
- Education
- Community and Retail
- Environment
- Transport and travel
- Public realm and green-blue infrastructure

It should be noted that the SEA did not carry out an appraisal on sections 1-5 of the SPD, as follows:

- Executive Summary
- About this SPD
- The Site
- Planning Policy Context
- Relevant Planning History

These initial sections of the SPD do not form part of the guidance with regards to actual delivery. These sections describe the links between the SPD and the City Plan, describes the outcome of the Issue and Options consultation, provides background to the site including some of the site constraints and sets the planning policy context and planning history. Although section 2 includes some key development principles, these are considered in greater detail in the subsequent sections of the SPD which have been subject to SEA appraisal.

The appraisal matrices are presented in Appendix E and summarised in Section 4 arranged by impacts of each section of the SPD.

2.5.2 Where appropriate, mitigation measures are recommended to avoid, reduce or offset the potential adverse impacts as a result of the Toad's Hole Valley SPD.

2.5.3 The SEA Regulations requires, inter alia, that cumulative effects should be considered. It stipulates consideration of the likely significant effects on the environment and that these effects should include secondary, cumulative, synergistic effects).

2.5.4 The potential for cumulative, synergistic or secondary or indirect effects as a result of the Toad's Hole Valley SPD has been considered within the appraisal, the findings of which are presented in Sections 4 and 5. In addition, a table setting out the potential for cumulative effects of the various SPD topic sections is presented in Section 5.

2.6 Technical Limitations and Uncertainties

2.6.1 During the assessment of the Toad's Hole Valley SPD, there has sometimes been uncertainty when predicting the effects. Where this has occurred, the uncertainty is identified within the appraisal matrices and accompanied by recommendations to mitigate such impacts. This includes, for example, recommendations for further study.

2.6.2 The Toad's Hole Valley SPD acts only as a guidance document for the future development of the site. There is therefore reliance upon future decision-makers to ensure sustainable development is ensured, and therefore where effects have been predicted, these cannot be predicted with any certainty.

2.7 Preparation of the SEA (Environmental) Report

2.7.1 This SEA Report presents the findings of the assessment to-date, including the information collated during scoping, assessment of options and the emerging SPD and documents the entire SA process. The results of the appraisals together with any mitigation measures proposed are presented in the remaining sections of this document.

2.8 Consultation on the Toad's Hole Valley SPD and the SEA Report

2.8.1 This SEA Report will be issued for consultation alongside the Toad's Hole Valley draft SPD to all key stakeholders (including statutory consultees and the public) for comment. Following the close of the consultation period, Brighton & Hove City Council will review the feedback and revise the SPD as appropriate. If significant amendments are made to the document, the SEA Report may also need to be updated to reflect the assessment of these amendments prior to the SPD being adopted.

2.9 Monitoring the Significant Effects

2.9.1 Monitoring should be undertaken where significant effects of the proposals were predicted through the SEA process. A draft monitoring framework which identifies indicators has been developed and is presented in Section 6. This framework will be updated for the final SPD. Monitoring will be undertaken as part of the Authority Monitoring Report (AMR).

Section 3: Appraisal of the Toad's Hole Valley SPD Issues and Options

3.1 Introduction

3.1.1 This section summarises the Issues and Options appraisal stage.

3.2 Issues and Options Paper

3.2.1 The Issues and Options paper was published for consultation during April and May 2016. This set out following issues to be addressed:

- Housing
- Office
- Education
- Community & Retail
- Environment
- Transport and Travel
- Public Realm and Blue/green Infrastructure

3.2.2 For each issue, the following options were put forward:

- City Plan only
- Broad brush SPD
- Detailed SPD

3.2.3 The issues and options were presented as a way of describing the type of issues to be addressed by the SPD, and the level of detail that may be included, as a way of guiding early engagement. However the Issues and Options paper was clear that the options had been drafted to stimulate debate and did not necessarily represent council policy. The following tables set out the Issues and Options which were presented in the consultation paper and which have been appraised against the Sustainability Framework.

Issues	Options		
	City Plan only (option 1)	**Broad brush SPD (option 2)**	**Detailed SPD (option 3)**
Housing			
Site is expected to accommodate minimum of 700 units; densities between 50-75 dwellings per hectare; minimum 50%, 3+ bedroom family-sized dwellings. City Plan Policy CP20 seeks minimum of 40% affordable housing, some of which could be achieved via all residential uses to help meet the city's need. Diversity of housing density, mix, type, tenure and design. Respect the setting of the SDNP.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Provide guidance on housing density, form, scale, mix of housing types and/or tenures across site to help meet identified needs and support the creation of a sustainable new, vibrant neighbourhood for the city. Identify opportunities for provision of Starter Homes as part of housing mix.	Explore options to maximise housing delivery by identifying broad locations where varying densities, building form and scale could be achieved in a way that is sensitive to the topography of the site and setting of the National Park and its surroundings. Assess site capacity and viability/feasibility of options explored. Identify key views to inform assessment of proposals and explore potential for building siting, height and massing to help minimise the impact of road noise and wind.
Phasing of development and delivery of infrastructure requirements.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Provide guidance on the phasing of development to ensure the delivery of essential infrastructure and, ensure that, supporting, ancillary and community uses are provided at appropriate times Ensure diversity of housing designs and concepts to help establish a strong sense of place over time and help to fund improvements to transport infrastructure, connectivity and access to and across the site.	Through a more detailed masterplan approach ensure a clearer understanding of infrastructure requirements and timely, incremental delivery of sites/areas that are central to the creation of a vibrant new community over time.

Office			
Site identified as having potential to accommodate 25,000 sqm of new high-tech, modern office space. Area between 3.5 and 4.5ha to be reserved for provision of a range of unit sizes. Office mix, type and phasing. Integration of office with other uses in the rest of the THV site and neighbouring areas.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Consider the nature of B1 employment floorspace envisaged for site. Identify network of locations across the site where a range of office needs (incubation/ innovation, local businesses looking to expand) could be incorporated into mixed-use development, active street frontages and/or the new neighbourhood centre.	Identify broad location(s) for a dedicated a employment hub that includes a range of flexible spaces to support development of a growth hub. Ensure office space is integrated with the rest of the site and surrounding areas so workers can benefit from access to existing and/or new local services.

Education			
Site identified as having potential to accommodate a new six-form entry secondary school for the city. Area of 5ha to be reserved for this purpose. Incorporation and role of the school in meeting city needs and the development of the new neighbourhood.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Explore potential for use of the school facilities as a more integrated facility for residents, community groups and social enterprises outside the school day. Explore opportunities to help fund delivery and maintenance of shared space, children's play, formal and informal sport when facilities are not being used for curriculum activities.	Identify a broad location for the new school exploring opportunities for delivery of multi-use school design and phasing (co-provision and co-finance of other required community facilities such as children play, informal and formal sport provision). Consider how design could accommodate shared facilities outside the school day and options for future expansion.

Community and retail			
Site with potential to accommodate a multi-use building with community meeting place, doctor's surgery and resource promoting links to the National Park. Provision of shops and cafes to support the development of a sustainable new neighbourhood. Community facilities, shops, cafés and restaurants are dependent on a critical mass of residents and visitors, and it is necessary to plan for their delivery.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Explore opportunities for temporary community and retail spaces/ activities prior to development to build links with neighbouring communities and attract future residents to the site.	Identify broad location for a multi-use community facility within easy access to the National Park and shops and cafes across the site considering how these link to housing, employment, school and other uses to be provided in order to positively contribute to the creation of a new sustainable neighbourhood. Consider integrating multi-use community building and ancillary retail is into and/or closely linked to a new neighbourhood centre, school and mixed-use development.

Environment			
Development should aim to be an exemplar of environmental, social and economic sustainability, achieve One Planet approach and promote UNESCO Biosphere objectives. Consider impact on the setting and sensitive landscape of the SDNP and guidance for Health Impact Assessment.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Identify opportunities for the design and layout of the development to support sustainable lifestyles and deliver sustainable buildings across the site. Identify key views to and from the National Park and other elements that will inform assessment of impact upon setting of SDNP. Explore options for linking the development with surrounding sports and leisure facilities.	Ensure the design and layout of the development supports low ecological impact lifestyle choices, high standards of building design, generation of decentralised low and zero carbon energy (in particular district heating), control surface water run-off and reduction of the impact of heat island effect and impact upon setting of SNDP across the development site.

Transport and Travel			
Road network surrounding THV severs it from neighbouring areas hindering access and movement to and across the site. The development is expected to reduce the need to travel, particularly by private car by integrating incoming communities into surrounding neighbourhoods. Need for provision of safe routes to school.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Identify road network improvements needed to accommodate new development, improved bus services and links to cycling and pedestrian network. Support production of effective travel plans for business, education and residential land uses to ensure potential for sustainable travel to the site is maximised. Identify opportunities to reduce car ownership/use across the site and create more cycling and pedestrian-friendly environments while providing appropriate car parking levels.	Based on broad land-use locations, identify strategic elements to knit new street pattern with that of existing neighbourhoods. Consider road design options that help decrease traffic speeds via traffic calming measures and/or introducing frontages on both sides of the road to replicate other city access routes, like Dyke Road. Identify key routes and connection/crossing points within movement network and opportunities for road and car parking design to encourage use of public transport, cycling and walking.
Minimise impact of air pollution and road noise.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Outline basic considerations to guide air quality assessment and monitoring prior to and after completion of the development. Explore options for incorporating design features such as vegetation that act as noise attenuation barriers and help reduce air pollution in sensitive areas of the Air Quality Management Area.	Identify broad locations where building design, landscape-led and noise masking measures would be designed into the development to help reduce impact of air pollution and noise. Identify opportunities to fund delivery.

Public realm and blue-green infrastructure*			
Development is required to conserve and enhance the designated SNCI and provide 2 hectares of public open space with young people and children's play space and informal sports facilities, as well as integrate water management and green infrastructure throughout the site to reduce the risk of flooding and deliver Biosphere objectives and contribute to Biodiversity Action Plan targets. Area is rich in prehistoric and Roman remains and an archaeological desk based assessment is required to inform approach. An Ecological Impact Assessment would be required to assess impacts and inform mitigation.	Policy DA7 and other City Plan Policies provide sufficient guidance.	Explore opportunities for incorporating into the design provision of streets and spaces for informal leisure and play, attractive landscape features to enhance biodiversity and sustainable drainage features such as infiltration ditches to accommodate water run-off and reduce the impact of extreme rainfall. Explore approach to secure funded enhancement and maintenance of the designated SNCI and secure it as a public open space. Identify key links between neighbourhoods and green spaces (green corridors).	Identify broad locations and key links to form a basic network of streets, squares and other open spaces, reduce water run-off and provide greater people and wildlife connectivity between sites. Provide guidance on sustainable urban drainage based on broad locations identified for housing and other uses.

3.3 Appraisal Findings

3.3.1 In order to ensure the requirements of the SEA Regulations are met, an appraisal of reasonable alternatives has to be carried out which should help to inform the emerging SPD. An assessment of the options presented in the Issues & Options Paper was carried out in July 2016 against the Sustainability Framework. Following this, results of the options appraisal fed into the development of the SPD.

3.3.2 The following table shows the appraisal findings for each sustainability objective. It should be noted that a combined assessment to cover all the issues and options was carried out, rather than individual assessments for each issue, in order to avoid repetition. The full assessment tables can be found in Appendix D.

Table 5: Issues and Options Assessment

	1. Biodiversity	2. Air Quality	3. Distinctiveness	4. SDNP	5. Housing	6. Transport	7. Water pollution	8. Water use	9. Contamination	10. Employment	11. Economic Dev.	12. Health	13. Community Safety	14. Deprivation	15. Engagement	16. Best use of land	17. Energy / CC mitigation	18. CC adaptation	19. Env standards	20. Accessibility	21. Waste
Option 1	-/+?	-/+	+	+?	+	-/+	+	+	+?	++	++	+	+	+	+	+	+	-/+	+	+	+
Option 2	-/+?	-/+	+	+?	++	-/+	+	0	0	+?	+?	++	++	+	+	+	+	-/+	++	++	0
Option 3	-/+?	-/++	+	++?	++	-/+	++	0	0	++	++	++	++	+	+	++	++?	-/++	++	++	0

3.4 Summary of Assessment Findings

3.4.1 Biodiversity

Option 1	-/+?
Option 2	-/+?
Option 3	-/+?

All options are considered to result in broadly similar mixed and uncertain impacts on the biodiversity objective.

Development of the main site could adversely affect existing biodiversity, the value of which is unknown and will only become apparent following production of an Ecological Assessment.

All options also have potential for opportunities which may result in positive impacts and could potentially mitigate adverse impacts, including: incorporation of planting throughout the site (option 1), conservation and restoration of SNCI (1), improvements to the NIA (1), conservation of existing and provision of net gains where possible (1); ideas for how biodiversity enhancing features could be integrated into streets and spaces (option 2), use of SUDS (2), identification of a network of green corridors (2), guidance on how different measures could be integrated across the site (option 3) and opportunities which enable connections between people and wildlife (3).

Preferred Option
All options are considered to result in mixed and uncertain impacts. Results may become less uncertain if options 2 and 3 are informed by an Ecological Assessment. Option 3 may have potential for more significant positive effects, as the identification of broad locations could ensure that any adverse impacts on biodiversity are taken into account when identifying locations, e.g. through the avoidance of certain areas which have greater value or through the inclusion of biodiversity enhancing areas. However, this is dependent on the production of an Ecological Assessment and it is unknown whether this will be carried out in order to inform the content of the SPD.

3.4.2 Air quality

Option 1	-/+
Option 2	-/+
Option 3	-/++

All options are considered to result in mixed impacts. Results for options 1 and 2 are considered to be broadly similar, with option 3 having more potential for greater positive impact.

Development of the site is highly likely to result in additional journeys in and around the area and this could have adverse effects on air quality. Air quality is generally good in this location despite its proximity to the trunk road, mainly because traffic is generally moving and existing topography allows for dispersal. It will be important to maintain good air quality in this area.

All options have potential for opportunities which may help reduce vehicular journeys, as well as address and potentially mitigate air quality impacts, including: delivery of improved sustainable transport links (option 1), requirement for Transport Assessment (1), measures which promote sustainable and active travel (1), ideas for design features that have air quality benefits (option 2), identification of the types of improvements to the cyclist and pedestrian network and the bus and road network (2), ideas which could reduce car ownership (2), identification of broad locations where building design could help reduce air pollution (option 3), and identification of routes that would facilitate movement by sustainable transport (3).

Preferred Option
All options are considered to result in mixed impacts, with the positive results for option 3 greater than the other options. This is mainly due to option 3 identifying broad locations where certain styles of building design could help reduce the impact of air pollution. It will be important to ensure the canyon effect is avoided in any future design, and that any changes to topography still allow air pollutants to be dispersed, and guidance on this should be included whichever SPD is pursued.

3.4.3 Distinctiveness and open space

Option 1	+
Option 2	+
Option 3	+

All options are considered to result in broadly similar positive impacts on this objective.
There is not considered to be any risk to heritage assets due to the location of the site.

All options have potential for opportunities that will result in positive impacts, including the requirement to provide 2ha of public open space, children's play facilities, informal sports facilities and 0.5ha of food growing space (all option 1); through opportunities which incorporate informal leisure and play into street design (option 2); through identification of broad locations for open space (option 3), through various opportunities which would support delivery of a sustainable neighbourhood (3).

Preferred Option
All options are considered to result in positive impacts. The positive impacts resulting from option 3 could be greater than the other options as the identification of broad locations for various uses and elements of the scheme would provide certainty as to how and where various uses could be delivered and integrated, including open space. Consideration of how different elements link together, including identification of a basic street network, would help with the delivery of a locally distinctive and sustainable neighbourhood.

3.4.4 South Downs National Park

Option 1	+?
Option 2	+?
Option 3	++?

All options are considered to result in positive uncertain impacts. Results for options 1 and 2 are considered to be broadly similar and results for option 3 have potential for greater positive impact.

Any development on the site could impact upon views from or of the SDNP given its proximity resulting in the uncertain effect.

All options have potential for opportunities that will result in positive effects, such as the requirement for development to respect the setting and consider impacts on the purpose of the SDNP (option 1), the requirement for contributions to improve links to the SDNP (1), the identification of key views to and from the SDNP (options 2 and 3); the identification of broad locations for various uses which are sensitive to and consider impacts on the SDNP (option 3), identification of a broad location for a community facility which facilitates access to the SDNP (3).

Preferred Option
All options are considered to result in positive uncertain impacts. The positive impacts resulting from option 3 could be greater than other options particularly through the consideration of landscape and visual impacts on the SDNP when identifying broad locations for various uses. However this would need a Landscape & Visual Impact Assessment to inform this approach and it is not clear whether this will take place to inform the SPD.

The SDNP has recently been awarded dark skies reserve status and mapping suggests that locations in fairly close proximity to the THV site (e.g. Devil's Dyke) already suffer from light pollution. It will be important that any development located at THV consider the impacts of light pollution and this could be highlighted in the SPD.

3.4.5 Housing

Option 1	+
Option 2	++
Option 3	++

All options are considered to result in positive impacts. Results for options 2 and 3 have potential for greater positive impact.

All options have potential for opportunities that will result in positive effects, such as the specific requirements set out in DA7, including delivery of minimum 700 dwellings, to make the best use of land with densities between 50-75dph, to provide 50% 3+ bedroomed dwellings, and CP20 requiring 40% onsite affordable dwellings (all option 1). Option 2 would provide further guidance on density, form, scale, mix and tenures, as well as identify opportunities for Starter Homes, and would provide guidance on phasing to ensure essential infrastructure is provided to support the housing delivered. Option 3 would identify broad locations where different types and forms of housing could be delivered, as well as providing more detailed guidance on phasing of infrastructure. Option 3 suggests a capacity study would be undertaken to inform the approach.

Preferred Option
All options are considered to result in positive impacts. The positive impacts resulting from options 2 and 3 could be greater than option 1 as although it is assumed a developer will seek to maximise housing delivered, further guidance on the mix of housing types and tenures, particularly to help local needs would be of particular benefit. In addition, further guidance on phasing, particularly of critical infrastructure to support the housing delivered would also be beneficial. If the SPD is informed by a capacity and viability assessment, this would also result in greater positive effects due to the certainty this would bring around what could be delivered and where.

3.4.6 Transport

Option 1	-/+
Option 2	-/+
Option 3	-/+

All options are considered to result in mixed impacts. Results for all options are considered to be broadly similar.

A development to include 700 dwellings, a school and employment floorspace will result in additional journeys in and around the area and this could have adverse effects on this objective through increased transport movements and congestion.

Delivery of a mixed use scheme including supporting uses which allow residents to meet some of their day to day needs on site could have positive impacts on this objective. All options have potential for opportunities which may help reduce vehicular journeys or combat issues arising from an increase in this location including: delivery of improved sustainable transport links (option 1), requirement for Transport Assessment (1), measures which promote sustainable and active travel (1), improvements to the trunk road (1); identification of the types of improvements to the cyclist and pedestrian network and the bus and road network (option 2), ideas which could reduce car ownership (2), identification of design opportunities for roads and parking that help encourage travel by other means (option 3), and identification of routes that would facilitate movement by sustainable transport (3).

Preferred Option
All options are considered to result in similar impacts. The opportunity which is considered to have the most potential for greater positive impact is the identification of examples that could be delivered across the site which could help reduce car ownership/use, and these should be explored further in the SPD. Option 3 suggests including measures that would decrease speeds on adjacent road, however this may lead to a displacement of traffic and would need to be subject to further testing.

3.4.7 Water pollution

Option 1	+
Option 2	+
Option 3	++

All options are considered to result in positive impacts. Option 3 has potential for greater positive impact.

The south-western tip is located within Zone 1(Inner) of a Groundwater Source Protection Zone, and the remainder of the site is located within Zone 2 (Outer) GSPZ. The site is not considered to be at risk of groundwater flooding, although the south-western tip is at risk of surface water flooding.

All options have potential for opportunities that should ensure positive effects, including the requirement for the protection of the groundwater source protection zone (Option 1), the requirement for development to prevent any increase in surface water run-off and flood risk (1), the requirement for new development to reduce water pollution and safeguard water supply (1), the requirement for new development to include SUDS and reduce flood risk (1); guidance on sustainable drainage features and incorporating them into street design (option 2); guidance on SUDS in relation to the broad locations identified for other uses (option 3), guidance to ensure SUDS and other flood risk measures are incorporated at an early stage of

design and incorporated where they will have the greatest effect (3); the identification of broad locations which could avoid areas at greatest flood risk (3).

Preferred Option
Option 3 is considered to have the potential for greatest positive effect. It is assumed the identification of broad locations would be informed by the constraints of the site, which includes flood risk and the location of the groundwater SPZ. This option would enable SUDS to be considered at an early stage and should ensure SUDS are fully integrated into the development, thus reducing flood risk and risk of pollution to water. The site is at the top of a valley system therefore it will be important to ensure that flood risk down the valley system is not increased as a result of development on site. This could be referred to in the SPD.

3.4.8 Water use

Option 1	+
Option 2	0
Option 3	0

Option 1 is considered to result in positive impacts. Neither options 2 nor 3 are considered to have any impacts on this objective due to the nature of the SPD.

Despite the fact that demand for water will increase due to the significant amount of development that will be delivered, option 1 is considered to contain policy requirements to minimise the demand on water. This includes the requirement for development to be of an exemplary environmental standard, requirement to meet certain water efficiency requirements for residential and non-residential development, the aspiration to achieve water neutrality, and the expectation for development to include measures that recycle water.

Preferred Option
Option 1 is the preferred option. Options 2 and 3 do not include examples of ways in which water could be minimised. The SPD could include examples or guidance of water saving/recycling measures that could be incorporated, however these are considered to be design details that are likely to be outside the scope of the SPD.

3.4.9 Contamination

Option 1	+?
Option 2	0
Option 3	0

Option 1 is considered to result in positive uncertain impacts. Neither options 2 nor 3 are considered to have any impacts on this objective, due to the nature of the SPD.

It is unknown whether any of the site is contaminated and therefore will require remediation prior to development and this will need to be subject to further site investigation. However, it is considered unlikely due to the undeveloped nature of the site.

Option 1 is considered to have requirements in place to ensure remediation of land takes place if needed, including CP8 which requires development to reduce land pollution.

Preferred Option
Option 1 is the preferred option. Options 2 and 3 do not include examples of how land could be remediated, if required. This is considered to be outside the scope of the SPD.

3.4.10 Employment & Economic Development

	Employment	Economic Dev.
Option 1	++	++
Option 2	+?	+?
Option 3	++	++

All options are considered to result in positive impacts. Results for options 1 and 3 are considered to be broadly similar and more likely to result in greater positive impacts than option 2. Results for option 2 are considered to be positive but uncertain.

All options will result in delivery of an employment site area capable of delivering 25,000sqm B1 floorspace. All options have potential for opportunities that will result in positive effects, such as the specific requirements set out in DA7, including an employment area (Option 1), provision of training and job opportunities for local people (1); provision of a range of different types of office floorspace (option 2); identification of a broad location for an employment hub to incorporate a range of types of workspace (option 3).

Option 2 suggests a network of locations across the site to provide a range of office needs, and this is inconsistent with the requirements of policy DA7 which suggests one key employment site, resulting in the uncertain impact.

Preferred Option
The impacts of options 1 and 3 are considered to be broadly similar. The identification of a broad location for an employment hub at an early stage, as suggested in option 3 could help to ensure the various uses are integrated as fully as possible, and could also assist with the consideration of other uses, such as off-street parking.

3.4.11 Health

Option 1	+
Option 2	++
Option 3	++

All options are considered to result in positive effects. Results for options 2 and 3 are considered to be broadly similar and more likely to result in greater positive impacts than option 1.

Many of the social determinants of health will be delivered through the development including housing, training and employment opportunities, opportunities which facilitate healthy/active lifestyles such as open space, and social capital in the form of a community building and health facilities.

All options have potential for opportunities that will result in additional positive effects for health, including addressing issues around highway safety (option 1), addressing noise and air quality impacts (1), carrying out a HIA (1); details on housing mix and tenures (option 2), guidance on design features that can mitigate air and noise issues (2), identification of measures to improve the cyclist and pedestrian network (2), ideas that could help reduce car ownership and maximise sustainable travel (2); identification of locations where building design can help to reduce the air and noise issues (option 3), identification of routes that would facilitate sustainable travel (3), identification of the type of supporting uses and infrastructure that would be required to support a sustainable neighbourhood (3).

Preferred Option
The impacts of options 2 and 3 are considered to be broadly similar. Both these options have potential for greater positive impacts for health through the inclusion of measures that will have either direct or indirect health benefits and support healthy lifestyles.

3.4.12 Community safety

Option 1	+
Option 2	++
Option 3	++

All options are considered to result in positive effects. Results for options 2 and 3 are considered to be broadly similar and more likely to result in greater positive impacts than option 1.

All options have potential for opportunities that will result in positive effects, including the requirement to address highway safety on King George VI Avenue (option 1), requirements to incorporate features that design out crime (1), the creation of

pedestrian and cyclist friendly environments (option 2), guidance on how informal leisure opportunities can be incorporated into street spaces (2), opportunities which increase potential for natural surveillance at different times such as the use of school facilities outside school time and opportunities for active street frontages (2), opportunities to link with existing neighbourhoods having potential to promote community cohesion (2); consideration of road design options that help decrease traffic speed (option 3), opportunities which increase natural surveillance at different times of the day in different places such as through school use or integration of office uses (3).

Preferred Option

The impacts of options 2 and 3 are considered to be broadly similar and are more likely to result in greater positive impacts than option 1. Both options 2 and 3 have a number of measures which will have an indirect impact on supporting community safety and minimising crime. Option 3 suggests that it would consider options that reduce traffic speeds, and if this is achieved this would result in particularly significant beneficial effects for this objective, although could result in a displacement of traffic.

The ability to design out crime should be a consideration in whichever option is pursued. If option 3 is pursued, broad locations should consider crime and deterring crime when identifying suitable locations for different uses, and how these interconnect.

3.4.13 Deprivation

Option 1	+
Option 2	+
Option 3	+

All options are considered to result in broadly similar positive effects. The site is situated between two wards with highly contrasting levels of deprivation; with an adjacent area in the Hangleton & Knoll ward in the 10% most deprived (overall deprivation) and the other adjacent area in the Hove Park ward in the 20% least deprived (overall deprivation).

All options have potential for opportunities that will result in indirect positive effects for this objective including the requirement to provide jobs and training for local people (option 1), delivery of housing including affordable housing (all options); guidance on the mix of housing to be delivered (option 2), measures which facilitate healthy lifestyles, such as improved pedestrian network, although only if taken up by adjacent communities where health deprivation is high (2); identification of key routes and crossing/connections which could help improve access for adjacent communities (option 3).

Preferred Option
All options are considered to result in similar impacts. Neither options 2 or 3 have any specific measures that would result in a significantly positive effect for this objective, and any effects would arise indirectly and would be dependent on take up by adjacent communities.

3.4.14 Community Engagement

Option 1	+
Option 2	+
Option 3	+

All options are considered to result in broadly similar positive effects. All options have either already carried out, or will result in community engagement.

Preferred Option
All options are considered to result in similar impacts.

3.4.15 Best use of land

Option 1	+
Option 2	+
Option 3	++

All options are considered to result in positive effects. Results for options 1 and 2 are considered to be broadly similar and option 3 is considered more likely to result in greater positive impacts than options 1 and 2.

The site is required to deliver various uses, including 700 dwellings, a site for employment uses, public open space, food growing space, and a site for a school. In order to deliver the requirements of DA7 development will have to make the most efficient use of the site.

All options have potential for opportunities that will result in positive effects for this objective including guidance on housing densities to be delivered across the site (option 2), the possibility of sharing/combining uses such as school space being used for other uses outside school times (2); identification of broad locations to maximise housing delivery (option 3), and the identification of broad locations for the various uses including school employment and community uses (3).

Preferred Option
Option 3 is considered to have the potential for greatest positive effect. The identification of broad locations should help to prevent piecemeal development and should result in a more efficient use of the land available whilst ensuring all the policy requirements are delivered.

3.4.16 Energy use / climate change mitigation

Option 1	+
Option 2	+
Option 3	++?

Results for options 1 and 2 are considered to be broadly similar. Option 3 has greater potential for more significant positive effect, however is also uncertain as would rely on further detail on how a decentralised low and zero carbon energy network could be delivered across the site, which it is assumed would need to be informed by further study.

Despite the fact that demand for energy will increase due to the significant amount of development that will be delivered, all options are considered to contain measures to minimise the energy consumption. All options have potential for opportunities that will result in positive effects including the requirement for development to be an exemplary sustainable development (option 1), for environmental sustainability to be central to the design and layout of a scheme (1), incorporation of decentralised energy infrastructure (1), energy efficiency standards for residential and non-residential development (1); identification of opportunities for how the design and layout will result in the delivery of sustainable buildings (option 2); guidance on how the design and layout could support decentralised energy infrastructure (option 3).

Preferred Option
All options are likely to result in positive effects. There is potential for option 3 to result in greater positive effects, however this depends on whether this option would provide information on how a district heating network could be delivered across the site and it is assumed that a study would be required to inform this approach.

3.4.17 Climate Change Adaptation

Option 1	-/+
Option 2	-/+
Option 3	-/++

All options are considered to result in mixed positive and negative impacts. Results for options 1 and 2 are considered to be broadly similar, with option 3 having more potential for greater positive impact.

Development of the site will result in the urbanisation of a greenfield site. Sites of a natural form have an important role to play in climate change adaption such as through the absorption of water and helping to maintain urban temperatures.

All options have potential for opportunities that will result in positive effects and potentially mitigate adverse effects including a priority to ensure run-off and flood risk does not increase (option 1), ensuring surface water run-off is maintained at greenfield rates (1), delivery of green infrastructure (1), requirements such as aspiring to water neutrality and reducing the heat-island effect (1); guidance on the types of sustainable drainage features that could be incorporated and how to incorporate them into street design (option 2), identification of potential green corridors (2); guidance on SUDS based on broad locations identified for various uses (option 3), early consideration of flood risk measures such as SUDS in locations where they will have the greatest effect (3); consideration of flood risk as a constraint when identifying suitable locations for various uses (3).

Preferred Option

Impacts from all options are considered to be mixed due to the existing form of the site. Option 3 is considered to have potential for greater positive impact due to the identification of broad locations where certain types of development may be acceptable and the consideration of flood risk measures at an early stage of a scheme, which will help to adapt to climate change impacts.

It would be useful for the SPD to provide guidance on and promote features which have multiple benefits, particularly as the land available is expected to achieve a lot. For example, how certain flood mitigation techniques could have benefits for biodiversity, air quality, water pollution, climate change adaptation and so on.

3.4.18 Meeting environmental standards

Option 1	+
Option 2	++
Option 3	++

All options are considered to result in positive effects. Results for options 2 and 3 are considered to be broadly similar and have potential to result in greater positive impacts than option 1.

The requirements to meet certain environmental standards are set in City Plan Part 1 policy CP8 – Sustainable Buildings. This requires non-residential development on Greenfield sites to achieve BREEAM Excellent standard. Residential development is not required to meet the standards of any nationally accredited scheme however is required to achieve a 19% improvement in energy efficiency over Part L and to meet water efficiency standards of 110l/person/day.

Options 2 and 3 will provide further details and guidance on measures that will support the achievement of a sustainable scheme, such as how design and layout could deliver sustainable buildings, opportunities to reduce car ownership and

promote sustainable travel, features which enhance biodiversity and features which tackle pollution and flood risk. All of these measures would support the development in achieving credits for the BREEAM assessment, as well as support achieving energy efficiency targets.

Preferred Option
All options will result in positive effects. There is potential for options 2 and 3 to have greater positive effects, due to the inclusion of information that could support a scheme in achieving the required standards. The SPD could explicitly show the link between certain measures and how these measures would support the achievement of certain standards, such as BREEAM credits, to further maximise beneficial impacts.

3.4.19 Accessibility – transport and services

Option 1	+
Option 2	++
Option 3	++

All options are considered to result in positive effects. Results for options 2 and 3 are considered to be broadly similar and have potential to result in greater positive impacts than option 1.

All options have potential for opportunities that will result in positive effects including the priority to improve sustainable transport links to the area (option 1), contributions to improved links to the SDNP (1), improved public realm (1), delivery of various supporting uses such as retail, community and health facilities (1); identification of improvements required to bus service, cycle links and the pedestrian network (option 2); exploring the potential for temporary services prior to development (2); identification of key routes and crossing points and traffic calming measures (option 3), identification of a broad location for the multi-use facility (3), consideration of how community facilities/services link with other uses in order to create a sustainable neighbourhood (3). Further guidance on phasing of essential and supporting infrastructure would also have a positive effect on this objective.

Preferred Option
All options will result in positive effects. There is potential for options 2 and 3 to have greater positive effects than option 1, due to the identification of various measures that would improve sustainable access and in particular through the identification of broad locations for various uses and consideration of how the different elements of the scheme would link together to form a sustainable neighbourhood.

3.4.20 Waste

Option 1	+
Option 2	0
Option 3	0

Option 1 is considered to result in positive impacts. Neither options 2 nor 3 include any information of direct relevance to this objective and are therefore considered to not have any impacts.

Despite the fact that waste will be generated at both construction and operational stages, option 1 contains policy requirements (within CP8) to minimise the production of waste, such as the requirement for development to minimise waste and facilitate recycling, composting and reuse. Other requirements relating to construction and excavation waste are set through in other Plans, such as the Waste & Minerals Local Plan.

Preferred Option

Options 2 and 3 do not include any measures relating to reducing waste, and therefore option 1 provides the greatest potential for positive impact. In order to achieve a positive impact, the SPD could make the link between using materials and resources efficiently e.g. through types of building design which could have a positive effect on increasing material efficiency, e.g. terraced or flatted types of dwellings, and although this is not directly related to reducing waste it is directly related to reducing the use of materials.

3.5 Overall summary

Although there is no consistent preferred approach, either of the options 2 and 3 seem to provide greater potential for more significant positive impact than option 1 alone, as both provide greater details on measures which could result in greater positive effects if implemented.

Some of the positive effects associated with Option 3 do seem to be dependent on the production of various studies and it is unknown whether these will be carried out in order to inform the SPD.

Section 4: Draft SPD Summary of Appraisal

4.1 Introduction

4.1.1 This section summarises the appraisal of the individual sections of the draft SPD against the SEA Objectives.

4.2 Draft SPD

4.2.1 The draft SPD was produced following consultation on the Issues and Options paper. The draft SPD is presented as follows:

- Section 1 - Executive Summary
- Section 2 - About this SPD
- Section 3 - The Site
- Section 4 - Planning Policy Context
- Section 5 - Relevant Planning History
- Section 6 – Development Response
    - Submitting a planning application
    - Quantum of development
    - Master-planning and landscape-led design
    - Place making
    - Housing
    - Office
    - Education
    - Community and Retail
    - Environment
    - Transport and travel
    - Public realm and green-blue infrastructure
- Section 7 - Development phasing and delivery of infrastructure

4.2.2 The SEA undertook appraisals of the topics within Section 6 Development Response as these topics provide the main guidance for delivery. The other sections are considered to provide background information and were not subject to SEA appraisal. The full appraisal tables can be found in Appendix E. A summary of impacts on the SEA Objectives is presented in 4.3 below.

4.2.3 In order for the appraisal to consider and reflect the impacts of the individual sections of the SPD, the appraisal did not assume that any other policy requirements would be met (e.g. City Plan policies), nor those of other sections of the SPD. Meeting City Plan policy requirements has been referred in the mitigation where appropriate. Therefore the following effects, particularly any adverse effects, can be considered to be worst case scenario.

4.3 Appraisal Findings

4.3.1 Quantum of Development

This section sets out the quantums of development to be delivered on the site including a minimum of 700 homes, a 5ha site for a school, a 3.5-4.5ha site for office space as well as the other requirements such as transport, blue-green infrastructure and public realm.

4.3.2 Positive effects were recorded for the following SEA objectives

- Local Distinctiveness
- Housing
- Employment
- Economic Development
- Health
- Deprivation
- Best use land
- Access

4.3.3 Adverse effects were recorded for the following SEA objectives

- Biodiversity
- Air Quality
- SDNP
- Transport
- Water pollution/flooding
- Water consumption
- Energy consumption
- Climate Change adaptation
- Waste

4.3.4 Uncertain effects were recorded for the following SEA objectives:

- Contaminated land

4.3.5 Overall, this section of the SPD performed well against the social and economic objectives by providing a mix of uses, helping to meet various housing, employment and education needs. The delivery of various uses should help to create a distinct neighbourhood within which residents can access their day to day needs. The amounts of development to be delivered will ensure the site's capacity is utilised fully, making the most of the space available.

4.3.6 In terms of environmental objectives, this section of the SPD had largely adverse effects. This is based on the amount of development proposed and the additional population arising which has potential to increase consumption of resources. It is also based on the change in landform from a greenfield

site, which provides various natural functions, to one of an urbanised form, which has potential for various adverse effects. Journeys made by car are considered to increase in this location, potentially with air quality impacts, although it is noted the area is not near to an AQMA. The site is also in close proximity to the SDNP and could visual impacts.

4.3.7 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 (Toad's Hole Valley), CP8 (Sustainable Buildings), and CP10 (Biodiversity), and through the SPD itself including the sections on Public Realm & blue-green infrastructure, Transport & travel, Master-planning & landscape-led design, Environment and Housing. In addition, it is recommended that the SPD refers to the need to undertake an ecological assessment, refers to opportunities to reduce/minimise light pollution impacts on the SDNP, and includes examples of measures that could reduce demand for water.

4.3.8 Masterplanning and landscape-led design

This section sets out the site considerations that the design and layout of the development will need to take account of, including for example, strategic views from and to the SDNP, topography and the SNCI. It provides guidance on building heights, siting, massing and form. This section also provides guidance on opportunities for clustering uses, for instance to create a neighbourhood centre and approximate locations of certain land-uses.

4.3.9 Positive effects were recorded for the following SEA objectives

- Biodiversity
- Air Quality
- Local Distinctiveness
- SDNP
- Housing
- Transport
- Employment
- Economic Development
- Health
- Best use of land
- Access

4.3.10 Adverse effects were recorded for the following SEA objectives

- Water pollution/flood risk
- Climate change adaptation

4.3.11 Mixed effects were recorded for the following SEA objectives

- Health & safety

4.3.12 Overall, this section of the SPD performed well against most objectives. The consideration of issues such as the protection of landscape character in order to identify suitable locations for certain types of uses, including higher density buildings and clusters of uses, should help to minimise impacts on the SDNP and should also help to ensure the most efficient use of the site is made. The guidance should help create a vibrant, distinctive and viable neighbourhood centre that is well connected to the rest of the site, facilitating access to services and uses within the site, providing opportunities for social interaction and helping support good community safety.

4.3.13 This section of the SPD has potential for adverse impacts against the objectives relating to water pollution/flooding and climate change adaptation mainly based on the suggested location for higher density development within the area of the site which has the highest risk of surface water flooding. In addition, the massing of development that will be required may exacerbate the urban heat island effect in this location.

4.3.14 The impacts for Health & Safety were considered to be mixed, as although the creation of a neighbourhood centre and clustering of uses would have positive effects due to passive surveillance, there is potential for adverse impacts based on the potential for road safety issues associated with pupils accessing the school.

4.3.15 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8, and through the SPD itself including the sections on Public Realm & blue-green infrastructure and Environment. In addition, it is recommended that the SPD refers to the need to maximise road safety for pupils travelling to the site for school.

4.3.16 Place-making

This section highlights the importance of creating a neighbourhood centre and provides guidance on the type of space, services and facilities that could be provided that would help form a vibrant and inclusive centre, including higher density housing, public realm, transport interchange and community facilities.

4.3.17 Positive effects were recorded for the following SEA objectives

- Local distinctiveness
- Housing
- Transport
- Employment
- Economic Development
- Health
- Health & Safety
- Deprivation
- Best use of land

- Access

4.3.18 This section of the SPD performed positively against all relevant objectives. In particular, the guidance provided should help to ensure the creation of a well-connected, identifiable neighbourhood centre through the clustering of certain uses including a public transport hub to facilitate access to sustainable transport. This section of the SPD was also found to be particularly beneficial for health, through facilitating active travel and access to health but also by ensuring the neighbourhood centre is socially inclusive. The creation of a vibrant and active neighbourhood centre will be essential in helping to deliver a sustainable and cohesive community.

4.3.19 There were no adverse or mixed effects resulting from this section of the SPD and therefore no further mitigation or recommendations are required.

4.3.20 Housing

This section sets out the amount, type and mix of housing to be provided. It provides guidance on densities to be achieved including guidance on the most suitable location for higher density development. The section also provides guidance on features which could be included in housing design including the consideration of accommodating a range of housing needs.

4.3.21 Positive effects were recorded for the following SEA objectives

- Local distinctiveness
- Housing
- Employment
- Economic Development
- Health
- Health & Safety
- Deprivation
- Best use of land
- Sustainable building standards

4.3.22 Adverse effects were recorded for the following SEA objectives

- Biodiversity
- Air Quality
- SDNP
- Transport
- Water pollution/flood risk
- Climate Change adaptation
- Waste

4.3.23 Mixed effects were recorded for the following SEA objectives

- Water consumption

- Energy consumption

4.3.24 Uncertain effects were recorded for the following SEA objectives:

- Contaminated land

4.3.25 This section of the SPD performed positively against the all of the social and economic objectives and some of the environmental objectives including making the best use of land available and local distinctiveness. In particular, the guidance provided should help to maximise the amount of housing, including affordable housing on the site, with housing being one of the wider determinants of health, therefore having benefits for health and reducing deprivation. Delivery of housing is intrinsically linked to economic growth and will create construction and service sector jobs.

4.3.26 In terms of most of the environmental objectives, this section of the SPD had largely adverse effects. This is based on the amount of development proposed and the additional population arising which has potential to increase consumption of resources and production of waste, although it is recognised that this section of the SPD refers to the achievement of high standards of sustainable building design. It is also based on the change in landform from a greenfield site, which provides various natural functions including a biodiverse resource, to one of an urbanised form, which has potential for various adverse effects such as increasing surface water flood risk. Journeys made by car are considered to increase in this location due to the increased population, potentially with air quality impacts, although it is noted the area is not near to an AQMA. The site is also in close proximity to the SDNP and development could have visual impacts.

4.3.27 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7, CP8 and CP10 and through other sections of the SPD including Public Realm, Environment, Transport, and Master-planning sections. In addition, it is recommended that the SPD refers to the need to carry out an ecological assessment, and refers to opportunities to reduce/minimise light pollution impacts on the SDNP.

4.3.28 Office

This section sets out the amount of office floorspace that should be provided. It provides guidance on the type and size of units to be delivered and provides guidance on the approximate locations that would be suitable for office accommodation. This section also provides further guidance on features that could be incorporated into office space.

4.3.29 Positive effects were recorded for the following SEA objectives

- Local distinctiveness

- Employment
- Economic Development
- Health
- Health & Safety
- Deprivation
- Best use of land
- Sustainable Building Standards
- Access
- Waste

4.3.30 Adverse effects were recorded for the following SEA objectives

- Air quality
- Transport
- Water pollution/flooding
- Water consumption
- Climate Change adaptation

4.3.31 Mixed effects were recorded for the following SEA objectives

- Energy consumption

4.3.32 Uncertain effects were recorded for the following SEA objectives:

- SDNP
- Contaminated Land

4.3.33 This section of the SPD performed particularly positively against the economic objectives. In particular, the guidance should help to ensure that a variety of business needs are met. This section of the SPD also performed positively against some of the social objectives, mainly due to link between employment and health, and also the possibility that it may help to reduce deprivation. The guidance suggests inclusion of employment uses within the neighbourhood centre which would help increase footfall, benefit community safety and contribute towards creating a distinctive local neighbourhood centre.

4.3.34 This section of the SPD had potential for adverse effects on some of the environmental objectives, some of which are linked to the resources used by new development and some which are linked to the change in landform from a greenfield site to one of an urbanised form, which has potential for various adverse effects as already described. Journeys made by car are considered to increase as a result of the office development and are considered likely to increase journeys made to the area, potentially with air quality impacts.

4.3.35 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8 and through other sections of the SPD including Transport, Master-planning, Public Realm, and Environment

sections. In addition, it is recommended that the SPD refers to opportunities to reduce/minimise light pollution impacts on the SDNP.

4.3.36 Education

This section sets out the amount of space that is required to be reserved for a secondary school. It provides guidance on ensuring the school is accessible and includes guidance on features which would provide opportunities for wider community use.

4.3.37 Positive effects were recorded for the following SEA objectives

- Local distinctiveness
- Employment
- Economic Development
- Health
- Health & Safety
- Deprivation
- Best use of land
- Access

4.3.38 Adverse effects were recorded for the following SEA objectives

- Air quality
- Transport
- Water consumption
- Energy
- Climate change adaptation
- Sustainable building standards
- Waste

4.3.39 Mixed effects were recorded for the following SEA objectives

- Water pollution/flood risk

4.3.40 Uncertain effects were recorded for the following SEA objectives:

- Contaminated Land

4.3.41 This section of the SPD performed positively against the social and economic objectives. It provides opportunities for employment and will provide access to education, training and employment, all of which are wider determinants of health. This section of the SPD also had potential to increase access to education and lifelong learning for adjacent communities, having positive impacts on reducing deprivation, although this is also considered to be uncertain and will depend on take-up. Although largely positive for health & safety, there were also uncertain impacts against this objective arising due to potential road safety issues, particularly for pupils traveling from outside the site. It also performed positively against some of the environmental objectives,

including local distinctiveness, through the potential role of the school as a focal point in the neighbourhood centre, making the best use of land, and increasing access.

4.3.42 This section of the SPD has potential for adverse impacts on some of the environmental objectives, resulting from the resources used to create and sustain a 1,300 pupil intake school. In addition, as the school will be serving the wider Hove community, it has potential to increase the number of journeys made by car to the area, potentially having air quality impacts.

4.3.43 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8 and through other sections of the SPD including Transport, Master-planning, Public Realm, and Environment sections. In addition, it is recommended that the SPD refers to the need to maximise road safety for pupils traveling to the site for school.

4.3.44 Community and Retail

This section sets out the community and retail services required to be delivered including a new multi-use community facility incorporating a doctor's surgery, as well as local shops. The section also provides guidance on locating these uses within or close to the neighbourhood centre.

4.3.45 Positive effects were recorded for the following SEA objectives

- Air quality
- Local distinctiveness
- SDNP
- Transport
- Employment
- Economic Development
- Health
- Health & Safety
- Best use of land
- Access

4.3.46 Adverse effects were recorded for the following SEA objectives

- Water pollution/flood risk
- Water consumption
- Energy consumption
- Climate Change adaptation
- Sustainable building standards
- Waste

4.3.47 Uncertain effects were recorded for the following SEA objectives:

- Contaminated land

4.3.48 This section of the SPD performed positively against the social and economic objectives. It provides opportunities for employment and will provide opportunities for residents to meet their various day to day needs on site, including access to community uses, health and retail, all of which will help to reduce the need to travel having benefits for air quality. It also performed positively against some of the other environmental objectives, particularly the objective relating to local distinctiveness, through the role that community and retail uses would have in helping to create a neighbourhood centre, also having beneficial health and social impacts.

4.3.49 This section of the SPD had potential for adverse effects against some of the environmental objectives, particularly those relating to resource consumption and waste production, and also the objectives associated with transforming of a greenfield site into one of an urbanised form, including the risks of increased surface water flood risk and climate change adaptation.

4.3.50 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8, and through other sections of the SPD including Environment and Public Realm sections.

4.3.51 There were no recommendations resulting from the appraisal of this section SPD.

4.3.52 Environment

This section provides guidance on opportunities for reducing the ecological footprint of the development, including consideration of sustainable building design, sustainable transport links and reduction in the heat island effect. It provides examples of how features could be designed into the scheme to ensure delivery of an exemplar sustainable development.

4.3.53 Positive effects were recorded for the following SEA objectives

- Biodiversity
- Air quality
- SDNP
- Transport
- Water pollution
- Water consumption
- Health
- Best use of land
- Energy consumption
- Climate change adaptation
- Sustainable building standards
- Access

- Waste

4.3.54 There were no adverse, mixed or uncertain effects arising from this section of the SPD.

4.3.55 Overall, this section of the SPD performed positively against all of the environmental objectives. It provides guidance on delivering sustainable buildings, which will help reduce resource consumption and provides guidance on water management solutions which will help to reduce the risk of surface water flooding as well as having benefits for biodiversity and climate change adaptation. It also provides guidance on using biodiversity to help minimise visual impacts.

4.3.56 It also performed positively against health, mainly due to the delivery of energy efficient homes which can reduce the risk of fuel poverty for residents, and also due to the health and well-being benefits that can arise from access to biodiversity and open space.

4.3.57 No mitigation is required however it is recommended that the SPD could be strengthened by including examples of measures which could reduce water consumption.

4.3.58 Transport and Travel

This section sets out the transport and travel challenges of the site and provides guidance on how these may be overcome to provide a well-connected neighbourhood. This includes guidance on ensuring a viable bus service can serve the new community, guidance on how the pathways, roads and sustainable transport infrastructure could enable movement to and within the site, including to the SDNP, and guidance on tackling existing transport issues such as traffic speed on adjacent roads.

4.3.59 Positive effects were recorded for the following SEA objectives

- Biodiversity
- Air Quality
- SDNP
- Transport
- Health
- Health & Safety
- Best use of land
- Access

4.3.60 Adverse effects were recorded for the following SEA objectives

- Water pollution/flood risk
- Climate change adaptation

4.3.61 Uncertain effects were recorded for the following SEA objectives:

- Contaminated Land

4.3.62 This section of the SPD performed positively against most of the environmental objectives. It provides guidance on measures which could increase active and sustainable travel, and reduce journeys made by car, having associated benefits for air quality. It also provides guidance on measures which may reduce traffic speeds on nearby roads, which would have benefits for road safety although may result in some localised air quality impacts. However, the SPD does suggest that reasonable levels of car-parking should be provided which may not help with discouraging car-use. This section also has positive impacts for access due to the provision of a network of pathways and roads that will link development both within the site and to adjacent communities.

4.3.63 The section of the SPD had potential for adverse impacts against water pollution/flood risk and climate change mitigation due to the delivery of a network of roads and paths that will increase the amount of hard impermeable surfacing throughout the area.

4.3.64 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8 and through other sections of the SPD including the Environment and Public Realm sections. In addition, it is recommended that the SPD could refer to the positive effects that vegetation would have in relation to improving/maintaining air quality, and ensures that options for traffic calming do not have any unacceptable effects on air quality.

4.3.65 Public realm and blue-green infrastructure

This section sets out the various services and requirements, such as transport, communication, biodiversity and water management that should be incorporated into the public realm network across the site. It provides guidance on how the public realm network could facilitate further community benefits such as crime reduction and social cohesion, and provides examples of co-location and flexible spaces. It provides guidance on how the requirements for food growing space can be delivered and guidance on the restoration of the SNCI.

4.3.66 Positive effects were recorded for the following SEA objectives

- Biodiversity
- Air quality
- Local Distinctiveness
- SDNP
- Water pollution
- Health

- Health & Safety
- Best use of land
- Climate change adaptation
- Access

4.3.67 No adverse effects were recorded.

4.3.68 Uncertain effects were recorded for the following SEA objectives:

- Contaminated Land

4.3.69 This section of the SPD performed positively against most of the environmental objectives. It has particular positive benefits for biodiversity through the various suggestions for how to incorporate green infrastructure across the site including through nature-based sustainable drainage systems, opportunities for food growing and through the incorporation of the restored SNCI into the wider public realm network. These measures also have benefits in terms of reducing the risk of water pollution/flood risk and climate change adaptation. The guidance to deliver an attractive and cohesive public realm would help to create a neighbourhood with its own sense of place, supporting local distinctiveness. This section of the SPD was also found to have particular benefits for making the best use of land available due to the guidance on how spaces can have multiple functions, e.g. open space providing water management.

4.3.70 This section of the SPD also performed positively against some of the social objectives, particularly those relating to health and health & safety through the provision of guidance that will help to deliver opportunities for recreation, activity and social interaction between all sections of the community.

4.3.71 Mitigation for uncertain impacts is considered to be provided through policies CP8 of the City Plan. There were no recommendations for changes resulting from the appraisal of this section of the SPD.

4.4 Recommendations

4.4.1 As indicated above, the appraisal suggested a number of recommendations in order to mitigate or reduce the likelihood of adverse effects or strengthen the positive effects of the SPD. The following table summarises the SEA recommendations for changes to the SPD. It also includes how the recommendations were incorporated into the SPD.

Table 6 Recommendations

Topic Section	Sustainability Objective	Potential Mitigation/Recommendations	Officer Response
Quantum of Development	Biodiversity	An ecological assessment would be required to determine the value of the site prior to any development taking place. This could be referred to in the SPD under paragraph 6.6.	Change made as suggested (see paragraph 5.6 of SPD)
	SDNP	There could be light pollution resulting on impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.	Changes made to page 4, 28, 31 and 32 of SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
	Minimise water use	The SPD does not include any reference to opportunities that may help reduce water demand, e.g. through harvesting rainwater. This could be included in the Environment section.	Incorporated into Environment section as suggested.
Masterplanning & landscape-led design	Air Quality	This section of the SPD refers to need for the siting, massing and form of buildings to seek to minimise exposure to air pollution for residents, although does not provide any examples. Could the SPD provide some examples of design features which could help to minimise exposure to air pollution?	Not implemented at this stage. Will liaise further with Environmental Health and potentially include at next stage.
	Health & Safety	Travel to school for those from outside the site would need to be carefully managed to ensure that road safety of pupils was not compromised. Could the section on Education include a reference to ensuring future road safety? E.g. 6.33 …with improved links from the south and west <u>that maximise road safety for pupils</u>…	Change made at paragraph 5.36 of SPD.
Place-making	No further recommendations		N/A
Housing	Biodiversity	An ecological assessment would be required to determine the value of the site prior to any development taking place. Although this is likely to form part of an EIA, this could be specifically referred to in the SPD under paragraph 6.6.	Change made (see 5.6 of SPD)

Topic Section	Sustainability Objective	Potential Mitigation/Recommendations	Officer Response
	SDNP	There could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.	See changes made to page 4, 28, 31 and 32 of SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
Office	SDNP	There could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.	See changes made to page 4, 28, 31 and 32 od SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
Education	SDNP	There could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD e.g. particularly that resulting from floodlighting of sports pitches/school grounds.	See changes made to page 4, 28, 31 and 32 od SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
	Health & Safety	Travel to school for those outside the site would need to be carefully managed to ensure that road safety of pupils was not compromised. Could the section on Education include a reference to ensuring future road safety? E.g. 6.33 …with improved links from the south and west <u>that maximise road safety for pupils…</u>	Change made (see 5.36 of SPD).
Community & Retail	No further recommendations		N/A
Environment	Minimise water consumption	This section of the SPD could be strengthened further, e.g. by incorporating a reference to opportunities to minimise water consumption, such as rain-water harvesting. This could be a measure that becomes more viable to include due to the economies of scale referred to in the SPD under para 6.40.	Change made (see page 27 of SPD).

Topic Section	Sustainability Objective	Potential Mitigation/Recommendations	Officer Response
Transport & travel	Air Quality	This section of the SPD suggests using vegetation to help reduce traffic noise. This would also help with absorbing air pollutants. It is suggested that the SPD could be strengthened by also referring to this benefit. The potential for indirect air quality impacts arising from traffic calming measures would need to be considered. It is recommended that the SPD refer to this under the Noise and Pollution section, or under paragraph 6.45 e.g. “ensuring that options considered for traffic-calming do not have any unacceptable indirect adverse effects for noise or air quality”.	Change made (see page 31 od SPD).
Public realm & blue-green infrastructure	No further recommendations		N/A

Section 5 Cumulative Impacts / Overall Impacts

5.1 Introduction

5.1.1 This section summarises the overall impacts of the SPD against the SEA objectives.

5.2 Assessment of overall/cumulative impacts

5.2.1 The following table shows the impacts of each section of the SPD against the SEA Objective. The final column of the table indicates whether the overall impact against each of the SEA Objective is considered to be broadly positive, negative, mixed, uncertain or whether there are negligible/no impacts anticipated.

5.2.2 Again, this assessment does not assume that any other policy requirements have been met, and neither does it assume that the recommendations put forward in Section 4 have been incorporated.

Table 6 Overall/Cumulative Impacts

	Quantum	Landscape	Place	Housing	Office	Education	Community retail	Environment	Transport	Public Realm	**OVERALL IMPACTS**
Biodiversity	-?	+?	0	-	0	0	0	++	+	++	**-/+**
Air Quality	-	+	0	-	-	-	+	+	+	+	**-/+**
Local dist.	+	++	++	+	+	+	++	0	0	+	**++**
SDNP	-	++	0	-	?	?	+	+	+	+	**-/+**
Housing	++	++	+	++	0	0	0	0	0	0	**++**
Transport	--	+	+	--	-	-	+	+	+	0	**--/+**
Water poll.	-	-	0	-	-	-/+	-	++	-	+	**-/+**
Water consump.	-	0	0	-/+	-	-	-	+	0	0	**-/+**
Contamination	?	0	0	?	?	?	?	0	?	?	**?**
Employment	++	+	+	+	++	+	+	0	0	0	**++**
Ec. Dev	++	+	+	+	++	+	+	0	0	0	**++**
Health	+	+	++	+	+	+	+	+	+	+	**+**
Safety	0	-/+	+	+	+	+?	+	0	+	+	**+**
Deprivation	+	0	+	+	+?	+?	0	0	0	0	**+?**
Engagement	0	0	0	0	0	0	0	0	0	0	**0**
Best use land	++	++	+	++	+	+	+?	+	+	++	**++**
Energy	-	0	0	-/+	-/+	-	-	++	0	0	**-/+**
CC adaptation	-	-	0	-	-	-	-	++	-	+	**-/+**
Bldg. Standards	0	0	0	+	+	-	-	++	0	0	**-/+**
Access	+	++	+	0	+	+	++	+	++	+	**++**
Waste	-	0	0	-	+	-	-	+	0	0	**-/+**

5.3 Discussion of Overall Effects

5.31 Positive Effects

The SPD was found to have a broadly overall positive effect on the following Sustainability Objectives:

- Local Distinctiveness
- Housing
- Employment
- Economic Development
- Health
- Health & Safety
- Deprivation
- Best use of land
- Access

5.31.1 The SPD may result in significant positive effects on housing, economic development and employment through the delivery of a variety of housing types, provision of land for a variety of employment uses, and provision of other wider community uses including shops, health and education, all of which will provide employment.

5.31.2 The SPD may result in significant positive effects on creating a locally distinctive neighbourhood through suggestions to cluster certain uses together in order to create a vibrant and distinct neighbourhood centre, including play, community, retail and higher density housing. The SPD should also have significant positive effects on increasing access through suggestions to deliver a network of paths and roads that connect the different uses within the site, as well as connecting the site itself with the wider area.

5.31.3 The SPD may result in significant positive effects on making the best use of land through the amount of development anticipated, through suggestions of suitable locations for higher density housing, and through references to opportunities that combine certain features which would help to use land efficiently, such as open space incorporating for play and food growing, and using nature based sustainable drainage systems that have benefits for health and the environment.

5.31.4 The SPD may result in a range of positive effects for health through delivery of some of the wider determinants of health including housing, education and employment opportunities, the encouragement of activity through delivery of a network of public and open spaces as well as active travel, and through the delivery of a new neighbourhood centre providing opportunities for social interaction.

5.31.5 The SPD may result in positive effects on health & safety through opportunities which provide passive surveillance such as the creation of a neighbourhood centre, and opportunities to improve access particularly to adjacent areas.

5.31.6 The SPD may result in opportunities which reduce deprivation, including provision of housing, employment and education, however will depend on take-up.

5.32 Mixed Effects

The SPD was found to have a broadly overall mixed effect on the following Sustainability Objectives:

- Biodiversity
- Air Quality
- SDNP
- Transport
- Water pollution/flooding
- Water Consumption
- Energy consumption
- Climate Change Adaptation
- Sustainable Building Standards
- Waste

5.32.1 The SPD may result in mixed impacts on biodiversity. Adverse impacts may arise due to the loss of a greenfield site which provides various ecosystem services as well as having potential ecological value, and due to the risk of increasing recreational pressure on the SNCI from the new community. However the SPD provides mitigation to these effects and may result in positive effects by including examples of opportunities for incorporating biodiversity across the site, such as chalk grassland green roofs, as well as suggestions to incorporate the restored SNCI within the public realm network.

5.32.2 The SPD may result in mixed impacts on air quality and transport. Adverse impacts may arise due to the increase in journeys made to, from and within the area from the increased local population and also due to travel for work and education purposes. The SPD provides some mitigation to these effects and may result in positive effects through measures which promote sustainable and active travel, such as pedestrian and cycle crossing points and extension of bus routes into the site.

5.32.3 The SPD may result in mixed impacts on the SDNP. Adverse impacts may arise resulting from the quantums of development delivered and the risk of adverse visual effects and light pollution. The SPD provides some mitigation

to these effects and may result in positive effects through the requirement that the design of the development considers visual impact and strategic views, suggesting suitable locations for high density development, as well as suggesting that a buffer should be considered.

5.32.4 The SPD may result in mixed impacts on water pollution/flooding and adapting to climate change. Adverse impacts may arise due to the urbanisation of a greenfield site and the increased risk in surface water flooding this may result in, as well as the potential for increased local temperatures due to massing and building form. The SPD provides some mitigation to these effects and may result in positive effects through guidance on delivering opportunities to manage water, such as nature-based sustainable drainage systems, and opportunities which help to regulate temperature, such as biodiverse features incorporated into buildings.

5.32.5 The SPD may result in mixed impacts on water and energy consumption and production of waste. Adverse impacts may arise due to the increased population and the resources consumed and waste generated. The SPD provides some mitigation to these effects and may result in positive effects through the promotion of high standards of building design, through guidance on water management and through guidance on opportunities which would reduce demand for energy.

5.32.6 The combination of implementation of the SPD with the City Plan Part 1 and other adopted policy should help to reduce the likelihood and significance of most of the adverse impacts identified above. Impacts which may be more difficult to mitigate are those related to transport.

5.33 Uncertain Impacts

The SPD was found to have an overall uncertain effect on the following Sustainability Objective:

- Contaminated Land

5.33.1 It is not known whether any of the land is contaminated or has potential for contamination. This is likely to be ascertained during the planning process. If contaminated land is found to be present on site then development of the site would provide the opportunity for remediation.

5.34 Neutral Impacts

The SPD was found to have an overall neutral effect on the following Sustainability Objective:

- Community Engagement

5.34.1 There were considered to be neutral impacts against this objective mainly because the sections of the SPD appraised did not refer to community engagement. However it is noted that the section “Submitting a Planning Application” refers to the need to engage with the local community as part of the planning process.

Section 6 Monitoring Recommendations

6.1 Introduction

6.1.1 This section puts forward a selection of indicators to monitor the performance of the SPD. It is a requirement of the SEA Regulations that the SEA proposes indicators to monitor the significant effects of the SPD. These can be positive or negative.

6.1.2 The performance of the SPD will be reported annually in the Authorities Monitoring Report.

6.2 Proposed Monitoring Indicators

Table 7 Proposed Monitoring Indicators

Effect/SA objective	Proposed Monitoring Indicators
Delivery of housing	• Total amount of dwellings delivered • Amount of affordable dwellings delivered
Delivery of employment/economic development	• Amount (sqm) of B1 office space delivered
Local distinctiveness	• Amount (sqm) of A3 and D1 floorspace delivered • Amount (sqm) of open space provided
Water consumption	• Amount (percentage) of residential development achieving CP8 policy target of 110l/p/day
Energy consumption	• Amount (percentage) of residential development achieving CP8 policy target of 19% energy reduction over Part L standards
Building standards	• Amount of non-residential development achieving CP8 policy requirement of BREEAM excellent
Transport	• Amount (proportion) of car-free residential development delivered

6.2.1 It should be noted that these monitoring indicators will not be confirmed until after the SPD has been adopted and may be amended between this draft and final stage.

Section 7 Next Steps

7.1 This Strategic Environmental Assessment, and the accompanying Non-technical summary, along with the draft SPD will be published for consultation. Formal representations can be made on any aspect of the draft SPD and this SEA.

7.2 Representations should be sent to:

Email: planning.projects@brighton-hove.gov.uk
Post: Planning Policy, Projects, Heritage & Design
1st floor, Hove Town Hall
Norton Road
Hove
BN3 3BQ

7.3 Any representatives received will be considered prior to finalising the SPD, which will again be subject to further SEA prior to adoption.

Appendix A – Summary Review of Plans, Programmes and Guidance

Nb. This has been updated to take into account any changed/updated documents

Title of document	Key messages for the SPD	Implications for the SEA
Overarching		
Securing the future: delivering UK sustainable development strategy (Defra Mar-05) National Planning Policy Framework CLG Mar-12 Sustainable Community Strategy Brighton & Hove – The Connected City 2014 Sustainability Action Plan (BHCC Nov 2012) Adopted Brighton & Hove Local Plan BHCC Jul-05 City Plan Part 1 (2016)	• Should contribute to the objective of achieving sustainable development. • Should be in conformity with the NPPF. • Should take into account of the priority themes identified in the Community Strategy. • Should build on the key objectives of the BH Sustainability Action Plan and the One Planet approach and aim to reduce ecological footprint. • Should take into account and be in conformity with policies in local and adopted plans, including policy DA7 which requires development to aim to be an exemplary standard in terms of environmental, social and economic sustainability and requires environmental sustainability to be central to the design and layout of the scheme; and other policy requirements.	• SEA objectives should include those to cover economic, environmental and social issues, should reflect the core planning principles of the NPPF, and reflect local priorities.
Biodiversity, fauna and flora		
EU Directive 92/43/EEC "Habitats Directive" International Convention on Biological Diversity 1992 & 2010 Wildlife & Countryside Act 1981 The Countryside & Rights of Way Act (2000) UK Biodiversity Action Plan CLG 1994 Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011) DEFRA 2011 Natural Environment and Rural Communities Act HMSO2006 Natural Environment White Paper Defra 2011 South East Biodiversity	• Should ensure protection of designated European sites. • Should have regard to the conservation and enhancement of all biodiversity, with particular emphasis on designated sites and species. • Should take into account local priority species and habitats and ensure they are not adversely effected. Should aim to: • Mainstream Biodiversity in Society • Integrate the conservation of biodiversity across other land uses • Conserve important habitats and species on a landscape scale	• The SEA Framework should include objectives relating to the protection and enhancement of biodiversity.

Title of document	Key messages for the SPD	Implications for the SEA
Strategy South East England Biodiversity Forum Feb-09 Trees and Development Sites SPD BHCC Mar-06 Nature Conservation SPD BHCC March-10 Local Biodiversity Action Plan v.4 BHCC 2013	• Share the benefits of biodiversity and ecosystem services	
Population & Human Health		
EU Directive 2002/49/EC relating to the assessment and management of environmental noise Noise Policy Statement for England Defra 2010 Noise Action Plan Brighton Agglomeration (DEFRA) 2010 Department of Health PSA Department of Health 2004 Health & Social Care Act 2012 Strategy to Reduce Health Inequalities in Brighton & Hove Reducing Inequality Review OCSI and Educe Ltd for BHCC2008 Joint Health & Wellbeing Strategy 2013 Joint Strategic Needs Assessment 2013 Spade to Spoon: Making the Connections - A Food Strategy and Action Plan for Brighton and Hove and update, Dig Deeper 2011 Children & Young People's Plan 2009-2012 BHCC2009 Health & Equalities Impact Assessment (HEQIA) (City Plan) 2012 and updates 2013 and 2014.	• Ensure that noise implications are taken into account when siting new development • Should seek to protect and improve health, including tackling health inequalities and promoting equality. • Should integrate elements of HIA at the earliest stage and ensure that local health issues and local circumstance are considered. • Should ensure that health inequalities continue to be tackled through planning for healthy communities and ensuring that planning continues to deliver the wider determinants of health including housing, employment, education and access to health and other services. • Should support the strategy, e.g. through protecting and providing for local food production, as part of the open space network. • Ensure that neighbourhoods include the services, infrastructure and jobs required to support a reduction in inequalities. • Should consider the issues raised by the HEQIA, mainly transport based, and young people as a potential sensitive community.	• Noise impacts should be considered in the SEA. • SEA framework should consider health improvement and protection. • SEA should ensure that the wider determinants of health are included within the SEA Framework • SEA should consider access to food as an indicator, as part of a health and access objective. • SEA should consider results of HEQIA assessment
Water, soil and waste		
Waste Framework Directive (2008/98/EC) Waste Strategy for England Defra 2007	• Ensure design and layouts of new development support sustainable waste	• The SEA framework should incorporate objectives that

Title of document	Key messages for the SPD	Implications for the SEA
East Sussex, Brighton & Hove & SDNP Waste & Minerals Local Plan 2013	management and the movement of waste up the hierarchy. • Should seek to protect and improve all types of water resources. Of particular relevance for the SPD is groundwater. • Should seek to reduce consumption of water. • Should seek to reduce the risks of flooding from all sources. Of particular relevance to the SPD is groundwater and surface water flooding. • Should seek to promote remediation of contaminated land and protection of soil types, including agricultural grade soil.	address waste minimisation. • • SEA framework should seek to protect and improve water quality, reduce flood risk and promote reduction of water consumption. • • SEA framework should promote the remediation of contaminated land.
EU Water Framework Directive (2000/60/EC)		
Water for Life (White Paper) DEFRA Dec 2011		
Future water: the Government's water strategy for England DEFRA Feb-08		
Making space for water: Taking forward a new Government strategy for flood and coastal erosion risk management in England DEFRA Mar-05		
Water for people and the environment: Water Resources Strategy for England and Wales Environment Agency Mar-09		
The Flood and Water Management Act 2010 HMSO 2010		
The Pitt Review: Learning Lessons from the 2007 Floods		
Adur and Ouse Catchment Abstraction Management Strategies (CAMS)		
River Basin Management Plan for the South East.		
Water Resources Management Plan 2015-2040 (2014) Southern Water		
Brighton & Hove Strategic Flood Risk Assessment update JBA Consulting 2012		
BH Surface Water Management Plan		
European Thematic Strategy for Soil Protection 2006		
Soil Action Plan for England 2004-2006 Defra 2004		
Brighton & Hove's Contaminated Land Strategy BHCC Updated Sep '05		
Air (includes transport)		
Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	• Should avoid, reduce and prevent the harmful effects of air pollution on human health and the environment. • Should maintain ambient air	• SEA framework should include an objective that seeks to reduce air pollution and
The Environment Act 1995 Part IV CLG HMSO 1995		

Title of document	Key messages for the SPD	Implications for the SEA
Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) Air Quality Action Plan BHCC 2015 European transport policy for 2010: time to decide 2001 Low Carbon Transport: A Greener Future – A Carbon Reduction Strategy for Transport (2009) Delivering a Sustainable Transport System Department for Transport Nov-2008 Active Travel Strategy Department for Transport Feb-2010 BHCC Full Local Transport Plan 4	quality where good and improve where the AQO are exceeded. Should take into account the impact on local AQMA and actions identified on local Air Quality Action Plans. • Should promote more sustainable transport choices for people. • Should promote accessibility to jobs, leisure and services by public transport, walking and cycling. • Should deliver development that reduces the need to travel, especially by car.	enhance air quality. • SEA should reflect the approach of reducing air pollution levels across the whole population of an urban area or region. This is because there is no recognised safe level for exposure to fine particles (PM2.5). • SEA framework should include a transport based objective which promotes sustainable modes of transport and increases access. • SEA framework should include objective that seeks to reduce the harmful effects transport can have on the economy, society and the environment.
Climatic Factors (includes energy)		
Renewable Energy Directive 2009/28/ec Energy Act 2011 Renewable Energy Strategy DECC 2009 Microgeneration Strategy DECC 2011 Renewable & Sustainable Energy Study AECOM 2012 Kyoto Protocol to the United Nations Framework Convention on Climate Change Dec-97 Nottingham Declaration on Climate Change UK Carbon Plan (2011 Climate Change Act HMSO 2008 Climate Change Strategy BHCC 2011	• Should promote the use of renewable energy technologies including opportunities for micro-generation. • Should support implementation of energy-saving infrastructure that could benefit adjacent communities. • Should support reductions in greenhouse gas emissions. • Should ensure that development is adaptable to long term changes in climate.	• SEA framework should include objectives to support reduction in greenhouse gas emissions and maximise use of renewable energy. • SEA framework should include objective to support adaptation to climate change.
Material Assets (includes open space, housing and economic development)		
Regional Economic Strategy for South East England 2006 –	• Should help to meet the	• SEA to include

Title of document	Key messages for the SPD	Implications for the SEA
2016 SEEDA 06 Brighton & Hove Economic Strategy 20013-2018 (BHCC) City Employment and Skills Plan (2011-2014) (BHCC) Employment Land Study Roger Tym & Partners for BHCC2006 and 2009 Employment Land Study NLP for BHCC 2012 Creative Industries in Brighton and Hove Report and Strategy BHCC2000 Creative Industries and Workspace Study Keith Hackett for BHCC 2008 Housing Strategy 2015 BHCC2008 Strategic Housing Land Availability Assessment Strategic Housing Market Assessment DTZ for BHCC 2008 Assessment of Housing Development Needs, Sussex Coast Housing Market Area, 2014 Affordable Housing Viability Study Update 2012 Open Space, Sport and Recreation Study PMP for BHCC 2009 Open Space Sports and Recreation Study Update JPC 2011 Audit of Community Level Infrastructure TDC 2004 Infrastructure Capacity Study Baker Associates for BHCC 2006 Green Network Study 2009	objectives of local economic strategies by ensuring that housing and employment opportunities come forward, as well as improvements to the transport infrastructure to support local economic growth. • Should take into account the need for provision of a variety of different workspace in order to meet future citywide needs. • Should include a range of different types, sizes, mixtures and tenures of housing to help meet local needs. • Should include an element of affordable housing provision to help meet local needs. • Should ensure that open space provision helps to meet any locally identified needs. • Should maximise opportunities to provide green infrastructure and links to the existing green network.	objectives on employment creation and developing the economy. • The SEA should include an objective relating to improving skills and creating job opportunities. • SEA framework should include an objective to ensure the appropriate amount and range of housing is delivered. • SEA framework should include an objective relating to open space and green infrastructure provision.
Cultural Heritage & Landscape		
National Parks & Countryside Act 1949 and Environment Act 1990 South Downs Management Plan 2008-2013 South Downs Joint Committee 2008 The Historic Environment: A Force for our Future Department for Culture, Media and Sport 2001 Conservation Principles,	• Should protect the National Park and have regard to the purposes of the National Park. • Should protect and conserve the natural environment that surrounds the city whilst supporting sustainable forms of development in that location.	• SEA framework should include objective to protect the SDNP. • SEA framework should include objective to protect local heritage assets and the character of existing neighbourhoods.

Title of document	Key messages for the SPD	Implications for the SEA
Policies and Guidance English Heritage 2008	• Should protect, conserve and manage change within the historic environment. • Should take into account the existing character of adjacent communities.	
Heritage Counts 2006: The State of the South East's Historic Environment English Heritage 2006		
A Strategy for Archaeology in East Sussex East Sussex County Council 1993		
Streets for All - South East English Heritage/DoT 2005		
A Strategy for the Conservation of Brighton & Hove's historic built environment 2015		
Urban Characterisation Study BHCC 2009		

Appendix B – Objectives, indicators and baseline information (from Scoping Report)

These indicators have been taken from City Plan Part 1 Sustainability Appraisal (February 2013). Data was updated at the time the Scoping Report was published (2015). Some data for the Hangleton & Knoll area has been added where available.

1. To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people				
Indicators	**Source of Data**	**Data**	**Comparison/Targets**	**Trend**
Number and area of designated sites (SAC, SSSI, SNCI, LNR, NP, RIGS and MCZ) presented as a percentage of the total administrative area of Brighton & Hove where known.	http://www.natureonthemap.org.uk CityWildlife website Special Places Wildlife Trust (Rachel Hackett) 01636 670096 City Snapshot (2014) Local Biodiversity Action Plan for Brighton & Hove (2013)	B&H: 1SAC* B&H: 2 SSSIs* B&H: approx 40% of administrative area is covered by the SDNP B&H: 2 RIGS (Black Rock; Friars Bay to Black Rock Marina) B&H: 1 Marine Conservation Zone (Beachy Head West) B&H: 8 LNR (8.2%) (628.5ha) B&H: 62 SNCIs (local wildlife sites) (7.2%) (612.3ha) *SSSIs and SAC combined make up 1.6% of total administrative area covering 138.8ha.	England: 4,000 SSSIs (7% of country's area). England in 2002 estimated 34,965 SNCIs. England: 1,280 LNRs (40,000 ha) England: 236 SACs 50 RIGs groups but no accurate information. (Estimated 2,000-4,000 RIGS sites.) In accordance with the CBD Nagoya 2010 agreement, to increase the amount of land designated as a terrestrial protected site from 15% to 17% From Biodiversity 2020 1A. Better wildlife habitats with 90% of priority habitats in favourable or recovering condition and at least 50% of SSSIs in favourable condition, while maintaining at least 95% in favourable or recovering condition;	Nationally, the amount of priority habitats in favourable or recovering favourable condition is increasing.
Extent of Natural and Semi Natural Green Space found in the council area (including hedgerows)	Open Space, Sports & Recreation Study 2009 Green Network 2009 BHCC	355 sites of Natural and Semi Natural Green Space; covering 709 hectares.	No targets as such.	Trend unknown

1. To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people				
Indicators	**Source of Data**	**Data**	**Comparison/Targets**	**Trend**
Area of semi-natural green space available for community use per 1000 population	Open Space, Sports & Recreation Study 2009	2.8 hectares / 1000 population. However only approx 100 ha lie within the built up area (0.4 ha / 1000 population)	Local target: Quantity: 2.8 hectares / 1000 population. Accessibility: within 15 minutes' walk (720 metres) Other cities: - Bristol 0.09 ha/1000 pop - York 1.61 ha/1000 pop - Wolverhampton 1.46 ha/ 1000 pop - Middlesbrough 1.9 ha/1000	Likely to worsen as population increases and amount of open space stays the same or is lost due to development pressure.
Achievement of specified biodiversity action plan targets	Local Biodiversity Action Plan for Brighton & Hove 2013	The BAP contains action plans for 15 habitats and 18 individual species, although in total the habitats action plans cover 118 species.	No comparable target.	Unknown.
(SC) Amount of development which avoids damage to biodiversity (presented as sqm of habitat or amount of features added or lost.)	Sustainability Checklist	2012/13: 1030m2 of chalk grassland and 560m2 of sedum roofs created. 2011/12: 54.4 m2 of Chalk Grassland and 132.7m2 of other uses (Sedum and Garden)	No national targets as such.	An increase from last monitoring period.
Number and percentage of sites where positive conservation management is being or has been implemented in the last five years.	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/377484/SDL_2103-14.csv/preview https://www.gov.uk/government/collections/biodiversity-and-wildlife-statistics	BH – 66 sites (includes 64 SNCIs and 2 RIGS) 2013/14 – 50% in positive conservation management	England: in 2013/15 47% of local sites were in positive conservation management.	BH – an increase of 28% from 2008/09 England – an increase of 15% over the last 5 years (from 2008/09)

2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning				
Indicators	**Source**	**Data`**	**Comparison/target**	**Trend**
Are levels of NO2 below the National Air Quality Objective?	2011 Air Quality Action Plan 2012 Progress Report 2013 Monitoring Results	From the 2013 monitoring results, 53 sites within the AQMA returned results, of which 46 exceeded the AQO for NO2. Out of these 53 sites, 25 had levels of NO2 higher than the previous monitoring period. Only 7 monitors within the AQMA marginally comply with the AQO, all of which are located close to the AQMA boundary. The site that would need the greatest improvement to meet the AQO was C11-12 at the Clock Tower on North Street, with NO2 levels of 118µg/m3, which is almost three times the legal limit. This is one of the sites where levels have worsened since the last monitoring period.	Target of 40µg/m3 annual mean of NO2 to meet the air quality objective.	Overall little improvement over the last ten years within the AQMA, however air quality outside the AQMA shows improvement over the long term.
Are levels of fine particles PM10 below the National Air Quality Objectives?	BHCC Environmental Health	During 2011 PM10 has been monitored at Roadside on Beaconsfield Road adjacent to the A23. An eleven month mean was recorded equal to 27.4 µg/m3. This compares to an annual average limit value of 40 µg/m3. In just under eleven months there were 15 daily means greater than 50 µg/m3. Equivalent to 20 days for the full year which compares to an allowed number of 35 days for the calendar year. Defra's automatic urban and rural network includes a monitoring station in Preston Park, Brighton. 2011 results indicated PM2.5 annual mean of 12 µg/m3 at this site. The level compares to the EU target of 25 µg/m3.	Nationally total emissions of PM10 fell by 50 per cent (192 thousand tonnes) between 1980 and 2006. However, PM10 increased in 2006 for the first time since 1990. Results for B&H are similar to other roadside sites in East Sussex and are slightly lower than those recorded over a similar period in Hastings and Eastbourne. At comparable roadside localities we would expect a slight increase in particulate matter to the east due to lower rainfall and greater proximity to continental Europe.	Insufficient data

2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning				
Indicators	**Source**	**Data`**	**Comparison/target**	**Trend**
Extent of air quality management area in Brighton & Hove	BHCC Environmental Health	There is one AQMA for the city that was declared in 2013. This now includes Rottingdean High Street that was outside the AQMA 2008 but that was subject to a Detailed Review in 2012 due to exceedence of NO2. However, in total the AQMA 2013 encompasses a smaller area than the AQMA 2008.	The former 2004 AQMA was extended in 2008 to include new areas of exceedence. The 2010 Air Quality Progress Report showed that 2 monitoring locations outside the AQMA exceeded the AQO for the first time. A Detailed Review of these sites took place and resulted in the boundary being amended. Sites within the AQMA 2008 where monitoring indicated improvement over time and compliance with the AQO have not been included within the AQMA 2013, resulting in a smaller AQMA in total.	The extent of the AQMA has reduced between 2008 and 2013. With the AQMA 2013 covering approximately a quarter of the size of the 2008 AQMA.

3. To maintain local distinctiveness and preserve, enhance, restore and manage the City's historic landscapes, townscapes, parks, buildings and their settings and archaeological sites effectively				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Number and % of Listed Buildings (Grade I and II*): (a) On the At Risk register; (b) Subject to unauthorised alterations; © Subject to demolition; and (d) Successful enforcement actions.	Heritage Team and Heritage at Risk Register English Heritage	479 (14%) buildings are graded 1 and 2* (a) 7 buildings on the current EH register (13/14) (b) Data not available; © Data not available; (d) Data not available;	Percentage of Listed Buildings is more than double the national average (6%). Target: to improve performance over time.	Number and percentage of buildings at risk has reduced from 9 in 2012 to 7 in 2014.
Number of conservation areas in the city.	Heritage Team English Heritage	There are 34 conservation areas throughout the city. 5 of these are classified as being at risk by English Heritage. This is 14% of the total.	National average for CA at risk is 7.4% (EH 'At Risk' Register).	Less CA on at risk register now than in 2009, therefore situation improving.

3. To maintain local distinctiveness and preserve, enhance, restore and manage the City's historic landscapes, townscapes, parks, buildings and their settings and archaeological sites effectively				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Number of conservation areas de-designated, or parts of conservation areas de-designated, as a result of loss of historic and architectural detail.	Heritage Team and monitoring from Architectural Features SPD 2009.	2013/14 - None 2012/13 - None 2010/11 – No conservation areas or parts of conservation areas have been de-designated.	No targets at such	None de-designated so far.
Percentage of conservation areas where the loss of historic or architectural detail is considered to be a 'significant' or 'very significant' problem.	Heritage Team and monitoring from Architectural Features SPD 2009.	2013/14 – 11.8%	No targets as such The starting baseline figure is 33% (2008/09)	This is an improvement on the 2010/11 figures of 20%
Amount and type of open space per 1,000 population in comparison to the open space standards.	Open Space Sports and Recreation Study, 2009	City-wide: Children & Young People – 0.047 ha/1,000, shortfall of 0.012 ha/1000. Parks & Gardens – 0.92 ha/1000, no current shortfall identified. Natural/semi-natural – 2.8 ha/1000, no current shortfall identified. Amenity green space – 0.59 ha/1000, surplus of 0.008 ha/1000 identified Allotments/gardens – 0.23 ha/1000, no current shortfall identified. (nb results based on population 2006 – shortfalls identified for all typologies for predicted 2026 population)	Local current targets for quantity: C&YP – 0.55 ha/1000 pop P&G – 0.92 ha/1000 pop N/SN – 2.8 ha/1000 pop AGS – 0.582 ha/1000 pop A/G – 0.23 ha/1000 pop	Likely to worsen as population increases and new open space unlikely to be created to keep up with the increase in population.
(SC) How much open space has been created and/or lost as a result of development?	Sustainability Checklist	In 2013/14 2897 of open space was created and 647m2 was lost, giving a net gain of 2250m2 across the following typologies: Residential garden, children informal play, parks and gardens and others. The typology lost was residential garden.	No national targets as such.	No measurable trend as such.

4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**

4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Number of bus services that operate to the south downs from Brighton & Hove?	BHCC Transport Team	There are 31 bus routes that run from Brighton & Hove covering access to various points and towns in the downs. This includes the 47, 52 and 57 which are subsidised by BHCC; numbers 77, 78 and 79 "Breeze up to the Downs Partnership, for which BHCC is the main funder; and 17, 40, 40x and 273 which run north via the A23.	N/A	No measurable trend as such.
Tourist numbers visiting the south downs?	SDNPA Visitor Survey 2012 South Downs Joint Committee: South Downs Visitors Survey 2004	Estimated 2012: Total number of visitor days spent in the SDNP: 46,308,000 (rounded) 1,992,000 – visitor days spent by visitors staying overnight in SDNP in paid and unpaid accommodation 6,771, 880 – visitor days spent by visitors staying overnight outside SDNP; 31,071, 066 – visitor days spent by people living outside the SDNP; 6,473, 470 visitor days spent by people who live within the SDNP Estimated total 2004: 39, 173,000	The SDNP is the most visited National Park in the UK and has the third highest visitor spend, after the Lake District and Pembrokeshire Coast.	Overall, there has been in an 18% increase in visitor days spent within the SDNP since the last visitor survey.
Amount of land under: 1. Entry level; and 2. High level environmental stewardship schemes.	Natural England AMR	2013 Total – 2669m2	No National targets as such.	No trend as such

4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Sustainable routes available to access the Downs: Bus Train Bike On foot	www.southdowns.gov.uk http://www.nationaltrail.co.uk/Southdowns/uploads/SDW_transport_guide_2010_final.pdf http://www.opencyclemap.org/	**Buses** – see above for number of routes and services that access the Downs. In addition, there are 18 Bus Walks leaflets which features walks in the SDNP that start and end at bus stops. **Trains** – various train stations are situated within the SDNP that can be easily accessed from Brighton & Hove, including Hassocks and Lewes. **Bike** - The South Downs Way is a trail that is shared by cyclists, horse-riders and walkers that covers 160km within the SDNP that passes through Castle Hill, Ditchling Beacon and Devil's Dyke, all of which can be accessed easily from Brighton & Hove. National Cycle Network route 82 heads north-west out of the city, joining the South Downs Trail near Fulking. NCN route 20 heads north out of the city in the direction of Pycombe. NCN route 90 heads north east out of the city heading in the direction of Lewes. NCN route 2 heads in an east/westerly direction along the seafront, thereby encompassing the cliffs east of the Marina. **On foot** – Various parts of the SDNP locally can be accessed on foot and there are a number of public rights of way that cross from the city into the SDNP, such as those at Stanmer Park, Wild Park, Foredown Ridge, Sheepcote Valley and Hollingbury Hill, as well as various other locations. The Rights of Way Improvement Plan 2007 also identified "Missing Links" in the ROW network, some of which may facilitate access. See also Bus Walks above.	No targets as such.	Unknown

5. To meet the essential need for decent housing, particularly affordable housing.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
(CPP Headline Indicator) (H5): Gross affordable housing completions. (a) + (b) where: (a) = sum of socially rented houses (b) = sum of intermediate affordable housing	Authority Monitoring Report 2013	13/14: 163 (37%) affordable units 12/13: 103 (27%) affordable units 11/12: 66: (21%) all of which were social rented. 10/11: 8 (3% of all housing) of which: 5 socially rented 3 intermediate housing	CPP Target: 230 a year (it is recognised that this target is based on historical data and that numbers are likely to be far fewer due to both changes in funding and the current economic climate. The Assessment of Affordable Housing Needs 2012 indicates over 22,000 households have a need for an affordable home in the 2012-2017 period. Sustainable Community Strategy: target mix of new affordable homes to comprise 30% 1 beds, 45% 2 beds and 25% 3 beds.	Amount delivered has risen steadily over the last three years, therefore situation improving, however still not meeting the identified local affordable housing need.
Net additional Housing	Authority Monitoring Report 2013	13/14 - 436 12/13 - 374 11/12 – 309 10/11 – 283 09/10 – 380 08/09 – 721	2010/11 saw the lowest completions in the last ten years, reflective of the economic situation at that time. The completions rate has increased since this time.	Amount delivered has fluctuated over recent years, reflecting the current economic climate
Average house price to income ratio (Brighton & Hove)	Nomis Web and Land Registry Jan 2014 (for 2013)	2013: 8.3 (£27,513 £230,000) 2011: 7.95 (£27,398 to £218,000 2005: 5.95 2004: 5.54 2003: 5.61	South East 2011: 7.1 (£28,828 to £206,271)	Generally increasing over time, therefore situation worsening.

5. To meet the essential need for decent housing, particularly affordable housing.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Number of properties where student-based council tax exemption applies.	Revenues Team	13/14: the average monthly number of properties to which student exemptions applied was 4322. (Actual range was from 3877 to 4701. 12/13: 4190 In 2009/10 this figure was 3313. In 2008/09 this figure was 3050. This number shows full student exemption only (e.g. where all residents in a property are students) and does not include properties whereby a discount is applied (e.g. where 1 person in a student household is in work).	No comparison or target as such.	Generally increasing over time, therefore indicates the amount of students inhabiting private lets increasing.
% of households considered to be suffering from overcrowding (1 less room than required)	Census 2011	BH: Of the 121,540 households recorded in the 2011 Census 20,755 (17.1%) showed over crowding (one or more less room than required) HK: 7.8% of households suffer from over-crowding.	BH 2001 = 12.7% England average: 2011 = 8.7% No target as such.	Increased, therefore got worse since last Census.

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development				
Indicator	**Source**	**Data**	**Comparison/target**	**Trend**
(CPP) Thousands of bus passenger journeys (i.e. boardings) per year in the authority	Annual Performance Update July 2014 Brighton & Hove Bus and Coach company BHCC Full Local Transport Plan 2006/07- 2010/11 BHCC Local Transport Plan Progress Report 2008	Number of bus passenger journeys: 12/13: 46.4m 09/10: 46.3m 08/09: 44.6m 07/08: 43.7m (Brighton & Hove Bus and Coach company)	To increase bus patronage by 1 million passenger journeys (18%) per year from 2003 baseline of 34.27m, rising to 40.2m in 2010/11. (LTP2 BVPI 102). This target has therefore been surpassed.	Generally increasing over time, therefore improving.

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development				
Indicator	**Source**	**Data**	**Comparison/target**	**Trend**
(CPP Headline Indicator) NI 186: Per capita reductions in CO2 emissions in the LA area - Transport	https://www.gov.uk/government/statistics/local-authority-emissions-estimates	CO2 emissions from road transport: 2012: 1.1kt/capita 2011: 1.1 2010: 1.1 2009: 1.2 2008: 1.3	UK average 2008: 7.0 tonnes per capita (total emissions) Target of 28% reduction for 2014, only a 17.6% reduction was achieved.	CO2 emissions from transport generally decreasing, therefore improving over time, although overall reductions not meeting overall target.
Annual average daily traffic flow	AMR	2012 (unless otherwise stated) Outer Cordon 5: 28,449 22: 19,784 608: 23,125 620: 15,654 City Centre Cordon 74: 15,071 800: 31,629 809: 11,428 813: 21,512		
(Corp 2.2.1) Annual average daily cycle count	Annual Performance Update	13/14 – 7052	Target 13/14 - 7658	Insufficient data
(SC) Percentage of residential or mixed use development within 500m of a bus stop or rail station.	Sustainability Checklist	6 out of 48 residential developments approved in 2013 indicated they were within 500m of a bus stop or rail station.	No national targets as such.	
(SC) Percentage of developments where parking is provided for Car Club	Sustainability Checklist	No developments (0%) included provision for car club in 2013/14.	No national targets as such.	No trend as such.
(SC)Percentage of developments where parking is provided for Cycle parking	Sustainability Checklist	2013/2014: For those approved applications with a submission to the Sustainability checklist; 93% will provide cycle parking.	No national targets as such.	Increased from 76% in 2011/2012.

6. To reduce the volume of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development				
Indicator	**Source**	**Data**	**Comparison/target**	**Trend**
% of the resident population who travel to work by (a) private motor vehicle (car, taxi or motorbike) (b) bus (c) on foot or cycle	(Census data)	2011: a) 37.2% b) 13.6% c) 25.4% 2001: a) 49.4% b) 12.5% c) 19.8%	National data 2011: a) 57% b) 7.5% c) 13.6%	Travel to work patterns appear to becoming more sustainable over time.
Car ownership per household	Census	2011: 0.86 2001: 0.87	National: 2011: 1.1	Decreased slightly.

7. Minimise the risk of pollution to water resources in all development				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
No. of potentially contaminated sites which have been classified as HIGH priority and will require further investigation as part of the City Council's Contaminated Land strategy.	BHCC Environmental Health	07/08 The council has 2863 sites for potentially contaminated land. These have been prioritised on a risk basis into five categories, with A being the highest and E the lowest A's = 3 sites. Nb. The council no longer collects this date as this indicator relates to former Best Value Performance Indicators.	No Data	Insufficient data
Status of the groundwater resource as measured by the requirements of the Water Framework Directive.	http://www.environment-agency.gov.uk http://publications.environment-agency.gov.uk/PDF/GEHO0309BPSZ-E-E.pdf State of the Local Environment Report 2011	2011: Overall Status = Poor Chemical Status = Good Quantitative Status = Poor (no change from 2009)	All bodies of water must aim to reach "good" standard by 2015 (Water Framework Directive).	No change in recent years.

7. Minimise the risk of pollution to water resources in all development				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
(SC) Percentage of new developments incorporating SUDs within the development area and/or beyond the development area.	Sustainability Checklist	None of the approved applications which submitted a Sustainability Checklist in 2013 included sustainable drainage systems.	No national targets as such. Nb: from April 2014, the planning application process will be responsible for the implementation of SUDS.	
Area of city at risk from flooding (non-tidal)	Strategic Flood Risk Assessment (October 2011) Surface Water Management Plan	Surface water: risk due to highly urbanised nature of city; 35,600 properties at risk of surface water flooding (of <1m) with 7 specific areas identified in the SWMP as prone to surface water flooding. Groundwater: the majority of the city is considered to be at low risk, although there are some areas at risk. Fluvial: no areas at risk of flooding from main rivers or ordinary watercourses.	Ground water flooding, surface water flooding, flooding from sewers and flooding from run-off from agricultural land following periods of high rain fall have all occurred in the city within the last 10 years.	No measurable trend as such.
(SC) Number of units designed to deliver estimated water usage patterns of: - 105 litres/person/day (equivalent to Code Levels 3 & 4) - 80 litres/person/day (equivalent to Code Levels 5 & 6)	Code for Sustainable Homes ratings, monitored via Sustainability Checklist	45/51 (88%) of planning applications approved with a submission to the sustainability checklist met either code 3 or 4. 5/51 (10% of planning applications approved with a submission to the sustainability checklist met either code 5 or 6.		

8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**
(SC) Percentage of developments incorporating measures to reduce consumption of water.	Sustainability Checklist	For those approved applications with a submission of the new Sustainability checklist; 45% of approved applications in 2012/13 indicated they would incorporate measures to reduce water consumption (66% New Build) and (25% conversion)	No national targets as such.	Increased since last monitoring period.

8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**
Domestic consumption of water (average household consumption per person per day)	State of the City 2014 State of the Local Environment Report 2011	2012/13 – 132 litres (metered) 2012/13 – 161 litres (unmetered) 2009/10 – 150 litres per household per day 2005/06 – 157 litres per household per day	The South East is reliant on groundwater for up to 70 per cent of its public water supply. The region consumes more water per person than most other UK regions, but receives one of the lowest amounts of rainfall. 2009/10 (south east) 156l 2012/13 (UK) 147 Southern Water has a target to reduce average water consumption to 133l/day/person by 2020	Generally decreasing over time, therefore situation improving.

9. To promote the sustainable development of land affected by contamination				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act.	Environmental Health Team	The first years data will be collected in 2013/2014	No target as such	
No. of sites designated as Contaminated Land (as defined [in Contaminated Land Strategy])? NB: this indicator will no longer be collected and will be replaced by the first indicator in following reports	BHCC Environmental Health	07/08 The council has 2863 sites for potentially contaminated land. Nb: The council no longer collects this information which is a former Best Value Performance Indicator, therefore no further updates can be reported.	No target or comparison as such.	No measurable trend as such.

10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
No indicators have been included for this objective as it is not considered to be of relevance to the Toads Hole Valley SPD.				

11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
Level of GVA per head	AMR 2013 (ONS)	2011: £20,914 2010: £20,703	UK 2012/13 - £21,674 SE 2012/13 - £23, 221	Remains lower than the national and regional average.
(BD1): Total amount of additional employment floorspace – by type (gross and net) Employment type is defined by Use Class Orders: B1 (a), (b) and (c), B2 and B8. Floorspace measured in m2. Gross = New floorspace + change of use + conversions. Net = New floorspace – demolitions + change of use + conversions.	BHCC AMR	13/14 Gross: 8,359 Net: 4953 12/13 Gross: 3,760 Net: -8,364	N/A	No discernable trend.
(BD2): Total amount of employment floorspace on previously developed land – by type (expressed as % of BD1 gross figure).	BHCC AMR	13/14: 100% 12/13: 100% on PDL		Reduced in recent years although normally trend is static at 100%.

11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
(BD3): Employment land available – b y type. Employment type is defined by Use Class Orders: B1 (a), (b) and (c), B2 and B8. Land available includes: (i) sites allocated for employment in DPDs and (ii) sites for which planning permission has been granted for employment use, but not included in (i). Expressed in hectares	BHCC AMR	10/11 – 45.1 hectares available 09/10 - 44.90 hectares available 08/09 – 40.71 07/08 – 40.71		Generally increasing, therefore improving.
(CPP Headline Indicator) Reduce the number of young people who are NEET	Annual Performance Update 2013/14, July 2014	2013/14: 6.9% 2011: 8.4% of young people are NEET	Target for 14/15 = 6.3%	Reducing, therefore situation improving .
Number and percentage of in-commuters compared to out-commuters	Census 2011	According to the 2011 census 31,915 people commute into the city for work on a daily basis, while 37,310 commute out of the city for work.	No target as such .	Net out-commuting increased since last Census.

12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
Proportion of VAT registered businesses /10,000 adults in Brighton and Hove	Annual Performance Report 2013/14	(2013) 69.7 (2008) 63.3 (2007) 69.8 (2006) 69.3	England 2008 57.2 South East 2008 60.0	Decreased over recent years, however appears to be returning to average levels.
Percentage population that are in employment?	Nomisweb AMR State of the City 2014 Economic Development Bulletin	2013/14: 74.4% 2012/13: 70.5% 2011/12: 71% 2010/11: 75.3% 2008: 74.60%	National average 2012/13: 75.4%	Increased in recent years back to pre-recession levels.
% population (age 16-74) who are economically active	Community Insight (Census 2011)	BH: 71.6% HK: 68.6%	England 69.9%	
(CPP) % of working age population that is claiming out of work benefits	Nomisweb Annual Performance Report	2013/14 = 12.2% 2010/11 = 12.4% (22,390) 2009 = 13.3% (22,970) 2008 = 21,135 2007 = 21,702	2010/11 UK average: 12.1% The number of people claiming JSA in Great Britain has doubled in the past two years. However, local performance in Brighton & Hove has been better than the national average in terms of percentage increases in JSA claimants, despite starting from a higher baseline.	Amount decreasing, thereby signifying an improvement.
(CPP Headline Indicator) % of 15yr old pupils in schools maintained by the LA achieving GCSE's at grade A*-C or equivalent?	Annual Performance Report, 2013/14, July 2014	13/14 – 53% 10/11 – 52.6% 08/09 – 44.5% 07/08 – 44.5%	BH target 13/14: 62% England average 13/14: 60%	Generally improving, although a reduction in recent years.
Percentage of population with no qualifications.	Community Insight (Census 2011)	BH = 16% Hangleton & Knoll = 26.7%	England 22%	

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
(CPP) Age standardised mortality rates for people aged under 75: • All cancers • Circulatory diseases • Suicide	Health Profile Brighton & Hove 2014 (DoH) www.bhlis.org	All cancers Brighton & Hove death rate in people aged less than 75 per 100,000 population 2010-2012: 155 2009: 120.7 2008: 106.41 2007: 129.32 2006: 135.30	UK average 2010-2012: 146 Targets Brighton & Hove To reduce by 20% death rate in people aged less than 75 years between 1997 and 2010, and by at least 12% in people under 75 by 2005 compared to 1997.	Death from cancer has increased in recent years and is one of the city's priorities.
	Health Profile Brighton & Hove 2014 (DoH) www.bhlis.org	Circulatory diseases B&H death rate in people aged less than 75 per 100,000 population 2010-2012: 79.5 2009: 69.6 2008: 71. 2007: 72.09 05/2006: 87.21	Uk average 2010-2012: 81.1 To reduce by 40% death rate from circulatory disease in people aged less than 75 years between 1997 and 2010.	Fluctuating, but lower than the UK average,
	Health Profile Brighton & Hove 2014 (DoH) www.bhlis.org	Suicide directly age-standardise rate in B&H per 100,000 population 2010-2012: 11.3 06-2008: 14.6 05-2007: 13.8 04-2006: 14.5	Suicide directly age-standardise rate in the UK (2010-2012) 8.5	Improved recently but still higher than UK average.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
Gap between the highest and lowest scoring Super Output Areas, IMD Health, deprivation and disability domain	BHCC Research and Consultation Team.	IMD 2010: Most deprived SOA E01916947 (in Queen's Park ward) = 2.78 (in 10% most deprived in UK Least deprived SOA EO1016983 (in Stanford ward) = -0.61 Therefore the gap between the highest and lowest scoring SOA has increased since 2007. IMD 2007: Most deprived SOA E01016942 (in Queens Park ward) = 2.45 (in 10% most deprived in UK) Least deprived SOA E01016983 (in Stanford ward) = -0.84 IMD 2004: Most deprived SOA E01016947 = 2.43.	Targets B&H: to reduce health inequalities.	Difficult to compare due to changes in reporting, however the gap between the lowest and highest scoring SOA appears to be increasing signifying that deprivation is worsening.
% of people who have a limiting long-term illness	Community Insight (Census 2011)	BH: 16% HK: 21%	England: 19%	
Life expectancy at birth (years): (a) Males (b) Females	Health Profile Brighton & Hove 2014 (DoH) www.bhlis.org	2010-2012 (a) 78.7 (b) 83.0 (2008-2010) (a) 77.7 (b) 83.2	Uk average 2014: Men – 79.2 Women 83	Generally improving locally, although life expectancy for men is slightly lower than the UK average.
Infant mortality rate: deaths up to 1 year per 1000 live births	Health Profile Brighton & Hove 2014 (DoH)	2010-2012 4.3/1000 births 2008-2010: 4.7/1000 births	There are an average of 440 infant deaths each year in the South East, producing an infant mortality rate of 4.5 per 1000 live births (significantly lower than the England rate of 5.1 per 1000 live) ((2007)	Generally improving.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
(CPP Headline Indicator) NI055 Obesity among primary school children in year 6 and obesity in children in reception class.	LAA Performance Report 2008/09 Health Profile Brighton & Hove 2014 (DoH) Community Insight (ONS)	(13/14) Year 6 children 13.6% (13/14) Reception children: (11/12) year 6 children: 15.5% (11/12) Reception children: 7.7% (10/11) Year 6 children: 15.2% (10/11) Reception children 8.2% HK 2011-2013: yr 6: 20.5%	Targets in line with previous NHS vital signs strategy: 11/12 – 8.4% reception, 17.4% yr 6.	Reception children obesity levels decreasing slightly over time. No discernable trend with year 6 children.
Obesity in adults	Community Insight (ONS)	2011-2013 BH: 20.4% HK: 27.3%	England 2011-2013: 24.1%	
(SC) Percentage of development incorporating provision for food growing	Sustainability Checklist AMR	34% of applications approved which submitted a sustainability checklist included provision for food growing in 2013/14	No national targets as such.	Insufficient data.
(SC) Percentage of developments incorporating the provision of on site outdoor space.	Sustainability Checklist	2 out of 48 approved residential developments with a submission to the sustainability checklist included onsite outdoor space within the public realm.	No national targets as such.	Insufficient data.
Adults achieving more than 150 minutes physical activity a week	DOH Health Profile 2014	2012: 63.4%	England average 2012: 56%	Insufficient data.
Number of people on the housing register?	City Snapshot 2014	October 2013: 17,200 households 2010/11 10,852 (equivalent to 9.3% of all households) 2008 – 10,988	No data	Situation worsening
(CPP Headline Indicator) NI112 Under 18 conception rate	DOH Health Profile 2014	2012: 29.1 2009: 36.5 2008:36.0 conceptions per thousand females aged 15 to 17	CPP targets: Target is taken from the NHS Vital Signs strategy (a 45% reduction from the baseline result of 48.1 in 1998). 11/12 target = 26.5	Achieved a 26% decrease since 1998 therefore situation significantly improved.

13. To improve the health of all communities in Brighton & Hove particularly focusing on reducing the gap between those with the poorest health and the rest of the city				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
Level of road traffic-related noise at key junctions	DEFRA noise mapping website (2009)	Levels measured at over 75 decibels at various places including: A259 junction with Palace Pier Large expanses of A259 between Pier and Portslade Junction with Victoria Gardens (A23) Vogue Gyratory System – Lewes Road Large expanses of Lewes Road Preston Circus junction – London Road Large expanses of London Road Old Shoreham Road at various junctions including Sackville Road and Hangleton Link Road junctions Large expanses of Old Shoreham Road	No targets as such.	Insufficient data.

14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**
(CPP) Number of total police recorded crimes? (Offences per 1.000 population)	BHCC Community Safety Team www.safeinthecity.info State of the City Report 2014 Annual Performance Update 2013/14, July 2014 Community Insight	BH: 2013/14: 34,875 crimes reported 134/1,000 pop) HK: 80/1,000 population 2012/13: 23,602 crimes reported (86/1,000 population) 2010/11: 24,052 crimes reported 2009/10: 24,384 2007/08 B&H 27,560 crimes were reported to the police in 2007/08	Targets: CPP – To achieve a 3% reduction from the 2009 baseline. 2010/11 saw a 1.4% reduction. 2013/14 England & Wales: 107.1/1,000 population	

14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**
Number of new developments incorporating Secured by Design features	AMR	2012/13: 100% of large scale developments included demonstration of how crime prevention measures had been incorporated. 08/09 indicates that 100% of large scale development proposals demonstrate how crime prevention proposals have been incorporated.	None as such	No measurable trend as such.
People killed or seriously injured in road traffic accidents.	DOH Health Profile	2010-2012 – 57.2/100,000 population	2010-2012: 40.5	.
The percentage of residents surveyed who said they feel 'fairly safe' or 'very safe' outside in their area: a) during the day; and b) b) after dark.	www.bhlis.org City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team	2014 – a) 96% b) 80% 2007/08 – a) 98.4% b) 72.17% 2005/06: a) 98.1% b) 71.7% Results currently being collated via CPP	The national mean 2005/06: a) 97.24% b) 70.18% This information has previously been collected in postal surveys such as the Place Survey. It will now be collected through the council's 'Citytracker' telephone survey. This will mean previous data will not be comparable to newly collected data.	Little change over time.

15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**

15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
Gap between the lowest and highest scoring SOA in the education, skills and training domain of IMD.	BHCC Research & Consultation Team	IMD 2010: Most deprived SOA E1016866 (East Brighton) 88.03 Least deprived SOA E1017001 (Withdean) = 0.68 Overall the gap has decreased very. Slightly (Gap in 2010 is 87.35, in 2007 it was 87.58) IMD 2007: Most deprived SOA E01016915 (Moulsecoomb & Bevendean ward) 88.48. Least deprived SOA E01017001 (Withindean ward) = 1.00 IMD 2004: Most deprived SOA = 87.51. Therefore deprivation in this domain has increased.	To reduce the gap between the 119 most deprived wards and the rest of the region by 10% as measured by the Index of Local Deprivation by 2010.	Little change over time.
Reduce the number of young people who are NEET	City Snapshot 2014	2013:6.7% 2011: 8.4% of young people are NEET	14/15 target 6.3%	Reduced in recent years therefore improving.
NI 152: % of working age population that is claiming out of work benefits	Nomisweb City Snaphot 2014	2013 = 10.3% (19,990) 2010/11 = 12.4% (22,390) 2009 = 13.3% (22,970) 2008 = 21,135 2007 = 21,702	2013 average: 10.3% The number of people claiming JSA in Great Britain has doubled in the past two years. However, local performance in Brighton & Hove has been better than the national average in terms of percentage increases in JSA claimants, despite starting from a higher baseline	Reduced in recent years therefore improving.
% of the population living in the 20% most deprived super output areas in the country (overall deprivation)	IMD2010	22.8% (Based on 2008 population estimates and calculated as sum of all individuals living in 20% most deprived SOAs in the country.) 2004: 22%	National average: 14.26%	Little change from 2004 (although difficult to compare due to change in reporting)

15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
% of the population over 60 who live in households that are income deprived	IMD 2010	Based on 2008 population estimates and IMD2010 = 22.30% 17.9% (2004)	National average: 13.88%	Situation worsening (although difficult to compare due to change in reporting)
(CPP Headline Indicator NI 116: % of children under 16 living in households in receipt of out of work benefits	http://www.hmrc.gov.uk/stats/personal-tax-credits/cps-la09.xls http://www.endchildpoverty.org.uk/images/ecp/Copy%20of%20Summary%20data%202012%20for%20reference%20-%20Final%20to%20upload.xls	BH 2011: 18.6% HK 2011: 22% BH: 2009: 22% 2008: 21% 2007: 20%	England 2011: 19.1%	Little improvement over time and great variations between least deprived and most deprived SOAs.
% people living in fuel poverty	City Snaphot http://www.decc.gov.uk/assets/decc/11/stats/fuel-poverty/3617-fuel-poverty-2009-subregional-data.xls LAA 08-11 LAA Performance Report 08/09	2012 – 12% 2009/10 = 12.2% 2008/09 = 12.94%	Uk 2012 = 11% South East Average 2009/10 = 11.8%	Little change over time.
Number of council tax benefits claims city-wide	Business Performance Team BHCC	2010/11 = 27,944 2008/09 = 26,190	No targets as such	Generally increasing.
Number of housing benefit claims city wide	Business Performance Team BHCC	2010/11 = 27,835 2008/09 = 26,803	No targets as such	Generally increasing.

16. To engage local communities in the planning process.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trends**
(CPP) (NI004) % of people who feel they can influence decisions in their locality This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.		Results currently being collected		

17. To make the best use of land available				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**
Total amount of employment floorspace on previously developed land by type	AMR	100% employment land on PDL (2014/2015)		
New and converted dwellings on PDL	AMR	91% of dwellings on PDL (2014/15)		
Percentage of development situated on greenfield land	AMR	9% residential and 0% employment on greenfield land (2014/15)		

18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
(CPP) Average annual domestic consumption of gas and electricity in kWh (Gas = kwh per meter) (Elec = Kwh per consumer) This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.	https://www.gov.uk/government/statistical-data-sets/gas-sales-and-numbers-of-customers-by-region-and-local-authority https://www.gov.uk/government/statistics/mlsoa-electricity-and-gas-2012	Gas 2013 – 11,997 (kw sales per meter 2011 – 12,422 (kwh sales per meter) 2010 – 13,461 2006 – 16,005 Elec 2012 = 3715 2011 – 3749 (kwh sales per consumer) 2010 – 3815 2006 – 4115	**Gas** 2011 Great Britain: average domestic consumption (sales per meter) 14,205 kWh **Electricity** 2010 Great Britain: average domestic consumption (sales per consumer) 4,148 kWh	Overall domestic electricity and gas consumption is decreasing.

18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
(CPP) Average annual consumption of gas and electricity (commercial and industrial) This is not a headline indicator of the CPP but is part of a larger suite of indicators used to manage performance in the city.	https://www.gov.uk/government/statistical-data-sets/gas-sales-and-numbers-of-customers-by-region-and-local-authority https://www.gov.uk/government/statistics/mlsoa-electricity-and-gas-2012	Gas 2013 = 359,168 2011 = 334,436 (kwh sales per meter) 2010 = 388,227 2007 – 320,373 Elec 2012 = 40,199 2011 = 39,821 (kwh sales per consumer) 2010 = 41,246 2007 = 41,355	No targets as such	Consumption fluctuating.
KT of CO2 emissions per capita in the LA area (domestic)	https://www.gov.uk/government/statistics/local-authority-emissions-estimates	Per capita domestic: 2012: 2.0 t/capita 2011: 1.8 2010: 2.1 2009: 2.0 2008: 2.2 Per capita total CO2 emissions: 2012:4.6 2011: 4.2 2010: 4.8kt/capita 2009: 4.6kt/capita 2008: 5.1 kt/capita	England average 2009: 6.1kilo-tonnes per capita (total emissions) Sustainable Community Strategy (SCS) target reductions in city CO2 'direct' emissions from 2005 baseline: - 12% by 2012/13 - 42% by 2020 - 80% by 2050. (SCS 2010)	Overall, emissions decreasing over time however target reduction has not been met and there has been an increase between most recent monitoring periods.
(SC) Percentage of developments with low and zero carbon (LZC) technologies proposed	Sustainability Checklist	50 of the applications which submitted a sustainability checklist in 2013 proposed LZC technologies. .	No national targets as such.	

19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**

19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events				
Indicators	**Source**	**Data**	**Comparison/targets**	**Trends**
(SC) Percentage of developments incorporating green walls and/or and green roofs.	Sustainability Checklist	2012/13 20 (37% included a green roof or wall. 2011/12: 11 (14.5%) developments with a submission to the new sustainability checklist and approved in 2011/12 included a green roof or a green wall.	No national targets as such.	Increased from previous monitoring period.

20. To encourage new developments to meet adopted sustainable buildings standards.				
Indicators	**Source**	**Data**	**Comparison/target**	**Trend**
(SC) Amount of the following: a) Number (and %) of small scale (5 or less units) new build committing to Level 3 CSH b) Number (and %) of medium scale new build residential committing to Level 3 CSH (6-9 units) c) Number (and %) of medium scale new build non-residential committing to BREEAM "very good" d) Number (and %) of major (10 or more units) new build residential committing to Level 4 CSH e) Number (and %) of major new build non-residential committing to BREEAM "excellent" Exceedences of current B&H minimum Code level requirements: f) Number (and %) of residential developments (all sizes) meeting Level 5 CSH	Sustainability Checklist 2013	For residential applications approved in 2013 in total: 60% committed to Level 3 CSH 27% committed to Level 4 CSH 12% committed to Level 5 CSH a) 24 small scale applications (50% of total) committed to Level 3 b) 5 medium scale application (10% of total) committed to Level 3 c) Not available d) None approved in year e) Not available. f) 6 residential approvals (12%) committed to Level 5	Current B&H minimum requirements are as set out in (a) – (e) in the indicator column (derived from standards set out in SPD08 Sustainable Building Design) National statistics: A total of 89% of the certificates at design stage and 90% of those at post construction stage have been awarded at Code level 3 since April 2007. A total of 7% of the certificates at design stage and 6% of those at post construction stage have been awarded at Code level 4 since April 2007 (House Building: March Quarter 2010, England).	

21 To promote and improve integrated transport links and accessibility

Indicator	Source	Data	Comparison/target	Trend
(SC) Percentage of developments that allow good, safe and direct access between the development and local schools, employment, shops, GP surgeries and leisure facilities	Sustainability Checklist	For those approved applications with a submission of the new Sustainability checklist; 95% of completed developments allow good safe and direct access between the development and local schools, employment, shops GP surgeries and leisure facilities.	No national targets as such.	Increased from 82% in 2011/2012
(SC) Percentage of development incorporating provision for food growing.	Sustainability Checklist	For those approved applications to a submission to the Sustainability Checklist in 2013, 42% incorporated provision for food growing.	No national targets as such.	
% of the resident population who travel to work by (d) private motor vehicle (car, taxi or motorbike) (e) bus (f) on foot or cycle	(Census data)	2011: d) 37.2% e) 13.6% f) 25.4% 2001: a) 49.4% b) 12.5% c) 19.8%	National data 2011: a) 57% b) 7.5% c) 13.6%	Travel to work patterns appear to becoming more sustainable over time.
22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these.				
Indicator	**Source**	**Data**	**Comparison/target**	**Trend**
Local Authority Collected Waste (LACW) (Brighton & Hove) (tpa)	AMR (Brighton & Hove only) Waste Management Strategy	103,653 tonnes (13/14) 104,418 tpa (12/13) 106,941tpa (10/11)	Targets for MSW reduction (from 421kg/head baseline 2008/09): 2012/13: 415 2013/14: 402 2014/15: 383	Generally appears to be reducing.
Commercial & Industrial Waste (Brighton & Hove & East Sussex) (tpa)	East Sussex County Council AMR 2010/11	475,000 tonnes per annum	Actual figures for C&I waste are difficult to obtain as it is commercially sensitive.	Insufficient data
Construction & Demolition Waste (Brighton & Hove and East Sussex) (tpa)	East Sussex County Council AMR 2010/11	906,000 tonnes per annum	Actual figures for C&D waste are difficult to obtain as it is commercially sensitive.	Insufficient data

(CPP Headline Indicator) Residual household waste per household	Annual Performance Update 2013	597 (12/13) 605 (10/11) (Previous data cannot be directly comparable as was waste per head) 421 (08/09) 433.81 (06/07)	CPP target = 602kg for 2012/13	Insufficient data for comparison due to change in reporting, however has reduced since last monitoring period.
(CPP Headline Indicator) (NI192) % of household waste (a) recycled (b) composted (c) used to recover heat, power, and other energy sources.	BHCC City clean AMR City Performance Plan Cabinet Report Appendix Policy, Performance and Analysis Team http://www.bhconnected.org.uk/sites/bhconnected/files/6%20Month%20Performance%20Update%20Appendix%201.pdf	13/14 a) 21.5% b) 3.3% c) 65% 12/13 a) 22.5% b) 3.5% c) 66% 10/11 a) 23.43% b) 3.47% c) 26.17% 1.01% reused	Sustainable Community Strategy (2010) targets: achieve 70% recycling rate for domestic by 2025 SCS target for 2014: for 32% of waste to be recycled, composted or re-used (actual amount = 27%)	Recycling rates have started to decrease, composting rates appear fairly static, and energy recovery rates appear to be increasing.
(SC) Percentage of developments designed with space for storage of recyclable materials.	Sustainability Checklist	Of those submitting entry to sustainability checklist in 2013/14 93% of new build new approvals will be designed with space for storage of recyclable materials.	No national targets as such.	Same as last monitoring period.

Appendix C Summary of Scoping Report Consultation

Consultation

The Scoping Report was available for consultation between the 9th February and the 16th March 2015. The report was available on the council website.

The Scoping Report was sent to the following external agencies:

- Environment Agency
- English Heritage
- Natural England
- South Downs National Park Authority
- Highways Agency

In addition, the following organisations which recently commented on the modifications to City Plan Policy DA7 were notified of the consultation:

- Friends of the Earth
- South Downs Society
- CPRE
- Hove Society
- Enplan
- Save THV Group
- Sussex Wildlife Trust
- National Trust
- Sport England

It was also circulated amongst Brighton & Hove City Council and East Sussex County Council officers representing the following:

- County Archaeologist
- County Ecologist
- Housing Strategy
- Economic Development
- Transport Planning
- Sustainability
- Environmental Health
- Education
- Water Management
- Architecture & Design
- City Parks
- Biosphere Reserve
- Sports Facilities
- Community Engagement

Consultation Response
The following table provides full details of all the comments received and summarises the response.

Respondent	Comment	Response
County Archaeologist	Assume the topics of heritage and ecology are included. (nb. Scoping report not looked at by respondent in detail).	Confirmation that these subjects are covered in the SEA Scoping.
Hove Civic Society	No Comments.	
BHCC Housing Strategy team	Page 10 & 52 Housing Strategy 2009 is being superseded with Housing Strategy 2015 (approved by Housing Committee in Jan and due Council approval 26 Mar) Bullet points in columns to the right still ok.	Comments noted. Reference to Housing Strategy 2015 to be amended.
	Page 69 Additional supporting evidence / indicators: - Housing Statistics Bulletins (homelessness etc): http://www.brighton-hove.gov.uk/content/housing/general-housing/housing-strategy-statistical-bulletins - Housing Costs Reports (including private renting): http://www.brighton-hove.gov.uk/content/housing/general-housing/housing-strategy-costs-reports - Trends were analysed in detail for the Housing Strategy 2015 and are in the supporting evidence at: www.brighton-hove.gov.uk/housingstrategy – specifically: o Supporting data analysis: http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2%20HS2015%20Supporting%20Data%20Analysis.pdf o Family housing supporting data analysis: http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/3%20HS2015%20Family%20Supporting%20Data%20Analysis%20%28Final%29.pdf	Comments noted. Additional supporting evidence / indicators to be made use of where relevant

Highways Agency	Our main concern with regard to the SPD is to ensure it contains guidance to help minimise the impact on the trunk road and in particular the junction with King George VI Avenue.	Comments noted. Additional information on capacity of the surrounding road network and the requirement for junction improvements added to the Transport and Travel section. Opportunities section includes a reference to the improvements required.
	During the assessment of the transport evidence base *(for the City Plan)* we determined that development at the site is dependent on an improvement taking place at the King George VI Avenue junction and that the site cannot be occupied in advance.	Comments noted. The City Plan Infrastructure Delivery Plan (Feb 2013) includes this junction improvement as essential infrastructure to be delivered prior to completion of development in this location. This reference will be added to the Opportunities section.
	The A27 north of Brighton is particularly busy and congested during peak periods and when the Amex Falmer Stadium is in use. The high level of development taking place in Brighton as well as in surrounding districts will put increasing strain on the network and it is important that this wider view is taken into consideration within the SEA and SPD.	Comments noted. Transport and Travel issues section updated accordingly. The cumulative impacts assessment will provide the opportunity to look at the impacts of development taking place throughout the wider area and will take into account local Transport Assessments.
	With respect to opportunities for the SPD, we fully agree with those listed within the table in Section 4 particularly promoting sustainable travel and influencing travel choice and car ownership through parking provision and car-free units. The latter is particularly important as there is a risk that car based travel could be prevalent given the location of the site adjacent to the A27.	Comments of support welcome and noted.
	Additionally, there is an opportunity to link the site comprehensively with the local bus network to ensure that both north/south (city centre)	Comments noted. Transport and Travel Opportunities updated accordingly.

	and east/west services serve the site. The east/west connection in particular will further reduce the need to travel on the A27.	
	We agree with objective 6 to reduce private car journeys although more detail will be required in order to assess whether or not the objective has been successfully met.	Comments welcomed. Additional Decision Making Criteria will be added to assist and steer the assessment of the SPD.
	Moving forward, we are happy to review measures to reduce private car use and help develop a strategy for meeting this objective.	Comments noted.
	As noted above, the site is dependent on junction improvements before it can be occupied. We are unclear as to whether this needs to be taken into account within the SEA. Detailed plans have not yet been developed but will likely be subject to an environmental assessment given the proximity to the National Park.	Comments noted. The SEA will only assess the contents of the SPD, therefore it will only assess the impacts of junction improvements if it forms a part of the guidance within the SPD.
Natural England	We accept your conclusions that there are likely to be effects on the environment from development and that an SEA is required.	Comments noted.
	Our mapping system does not indicate that any of the impact risk zones relating to nationally and internationally designated habitats, cover this site.	Comments noted.
	The main concern is therefore potential impact on the National Park. It is important that this is addressed and informs the master planning and design of the proposals for the site, in consultation with the National Park Authority.	Comments noted. Consultation with the SDNPA will help inform the SPD. SEA Objective 4 (SDNP) will assess impacts on the SDNP.
	The document has indicated that there are locally important habitats on site. Although this may be peripheral to the SEA process, some considerations of these assets and any remaining linkages to local habitat networks would be helpful.	Comments noted. SEA Objective 1 (biodiversity) will assess the impacts on biodiversity, including locally designated sites. Biodiversity Opportunities section updated accordingly to include a reference to considering links between habitats.
Campaign to Save Toad's Hole Valley	Having studied the scoping document at length, we are not convinced that the proposed assessment would address the impacts and issues of critical importance to the successful development of Toads Hole Valley. We list below what we believe to be the big issues for Toads Hole Valley, matters that we consider have the potential to 'make or	Comment noted. See comments below for responses.

	break' the quality of the proposed development.	
	1. Impact on landscape, flora and fauna, particularly on: • the landscape of the South Downs • views in to and out of the national park • views of the sea • the flora and fauna currently in Toads Hole Valley • the integrity and condition of the SNCI	Comments noted. Existing section on Landscape (p17) refers to issues and opportunities concerning the SDNP. Existing SEA Objective (4) concerns the SDNP, however additional "sub-objectives" for all SEA objectives will be developed to allow for clearer assessment and will include issues raised. Existing section on Biodiversity (p17) refers to issues and opportunities concerning local fauna and flora and the SNCI. Section will be amended to clarify that development will require an Ecological Assessment (in accordance with SPD11). Text will be amended as follows: *The SPD ~~could~~ <u>should</u> provide opportunities…* Existing SEA Objective (1) concerns biodiversity. Additional sub-objectives will be developed to allow for clearer assessment and will cover issues raised.
	2. The alleviation of existing problems: • King George VI Avenue – its steep gradient, dangerous speeds and noise nuisance to residents • Lack of facilities for health and secondary education in the locality	Comments noted. Transport & travel section (p15) will be amended to include issues relating to King George VI Avenue; amended to include reference to requirement for junction improvements (re: Highways Agency recommendation). Existing Noise section (p22) refers to issues and opportunities around noise. Existing Employment & Skills section (p23) refers to education provision issues. Reference to the need for health facilities in

		this location (in accordance with the City Plan Infrastructure Delivery Plan) already discussed in Demographics section, however will also be added to the Health section (p21) issues and opportunities.
	3. The challenge of developing a sustainable neighbourhood and avoiding the creation of a new ghetto of deprivation in the valley, would require: • Overcoming the severance of Toads Hole Valley from the Goldstone Valley by King George VI Avenue, and from the Hangleton neighbourhood by the steep bank of the SNCI. • Attracting adequate public transport services to the valley, which appears unlikely given the gradient of the valley (that buses find difficult even when empty), limited access points, and lack of any good service to the adjacent neighbourhood. • Attracting supporting uses, such as shops, takeaways, cafés or employment generating businesses, when there is a lack of evidence of any interest in locating them there. • Securing the development of both primary and secondary schools, and a large health facility, as opposed to simply identifying sites • Ensuring that residents without use of a car would have a good quality of life, given the steep gradients on the site, and the poor prospects for attracting supporting uses or good public transport services	Comments noted. Additional text added to Transport & Travel issues and opportunities section regarding severance issues created by the road and existing topography of the SNCI. A reference to the need to create a sustainable community added to various sections. The issue of the need for supporting uses, employment floorspace and educational provision is contained throughout various sections, including Ecological Footprint, Transport & Travel, Employment and Skills sections. The issue of the need for a pedestrian friendly connected environment is considered within the Transport & Travel section.
	We consider it is important for these critical issues to be given substantial weight in any assessment. Equally we believe that the effect on these issues should not be masked by the assessment of multiple impacts that, whilst important citywide, are of little relevance to the development of a 47 hectare site on the urban fringe.	Comments noted. The above issues are covered by various SEA objectives. Additional sub-objectives/Decision Making Criteria will be developed to help guide the assessment. The effect of the SPD on these issues will be assessed according to local context, where

		relevant, and wider (BH) context where not of direct relevance to the location.
	From the scoping document, it is clear these critical issues would be given scant consideration by the proposed SEA. In contrast, a Sustainability Appraisal and an Appropriate Assessment under the Habitats Regulations would be much more likely to address these key issues. Thus, in the interests of getting the best possible development of Toads Hole Valley, we believe both those assessments should be undertaken. In considering whether to undertake either of these assessments, the question should be 'would this assessment produce any useful and helpful results?' as opposed to looking for justifications in the legislation for undertaking neither.	Comments noted. NPPG paragraph 008 makes clear that Sustainability Appraisal is not a requirement for an SPD. An assessment under the Habitats Regulations would only assess the impacts on European sites, the nearest of which is Castle Hill SAC on the eastern edge of the city. Natural England's Impact Risk Zone tool on "magicmap" indicates that there would be no risk to the integrity of the European Site from development in this location. The response received from Natural England confirms that the site is not within any impact risk zones. A HRA screening was carried out on the City Plan Part 1, which includes development at Toad's Hole Valley. This is described in Section 1 and Section 4 pg 25 of the Scoping Report.
	The Health and Equalities Impact Assessment addressed some of the critical issues, but did not address the fact that the location and geography of Toads Hole Valley make it very difficult, if not impossible, to deliver important aspects of sustainable development. Simply saying that a policy would create the opportunity for a feature (of sustainable development) to be delivered is quite different to establishing a strong likelihood that it would actually happen. For example, it is recognised that public transport services may require initial subsidy, but it is not acknowledged that there may be long-term problems for the viability of public transport services. Regarding severance from neighbouring areas, it is simply assumed	Comments noted. It is agreed that the HEQIA and also SA/SEA makes an assessment on the assumption that aspects outlined in the policy will be delivered. This is the nature of this type of assessment.

	that the existing barriers would be effortlessly overcome. Similarly, as regards services and amenities, such as shops etc, it is assumed that, by allocating them to the initial phases of the development period, the market would naturally be attracted to provide them.	
	In summary: 1. Any assessment should address the key issues relevant to the specific development proposal and thereby produce results that are both significant and pertinent. 2. The proposed SEA would not adequately address the critical issues for Toads Hole Valley, outlined in points 1-3 above, so its output would not be very useful. 3. The Health Impact and Equalities Impact Assessment should be revisited so as to ensure it fully recognises and addresses the barriers to delivering sustainable development in Toads Hole Valley. 4. The proposed SPD for Toads Hole Valley should be subject to both a Sustainability Appraisal and an Appropriate Assessment under the Habitat Regulations, as those assessments would be more likely to address the critical issues and thereby deliver useful results.	Comments noted. The assessment of the SPD will be against the SEA Framework outlined in the SEA report, which either covers or will consider the issues identified in the representation. There is no legal requirement to carry out Health Impact Assessment on SPDs. The Health Impact Assessment of the City Plan is considered adequate for the SPD, and the issues identified within it have been carried forward through the SEA process where relevant, through the requirement for the SEA to cover the issues of population and health. A development-stage HIA will be required in accordance with City Plan policy CP18. An EQIA will be carried out on the SPD as it emerges. Neither a SA nor HRA are not considered to be a requirement for reasons outlined above.
BH Friends of the Earth	BHFOE welcomes much of what is in the scoping report, but believes that the following areas need much more emphasis within the document and will require particular scrutiny within the Strategic Environmental Assessment and in any proposals that come forward:	Comments noted. Individual comments responded to below.
	Layout and design of streets and housing - this will be very important in determining how the development is used by people that will then impact on their health and wellbeing. This will be influenced by street design and whether cars are allowed permanently on site or have to	Comments noted and supported. This suggestion of edge-of-site parking will be added to the Transport and Travel Opportunities section.

	be parked in an edge of site car park. Keeping motor vehicles off-site apart from necessary service and access requirements would help make the streets safer, more sociable spaces and allow them to contribute to the development's open space requirements. It would also reduce on-site pollution and encourage residents to consider a range of transport options, rather than jumping into the "car on the driveway". This is more likely to be a better and more successful solution than limiting on-site car parking as suggested in the scoping report which could just push car parking into the surrounding neighbourhoods. Limiting but still allowing on site car parking, would not offer nearly as many on-site benefits as BHFOE's suggested approach unless car parking is kept out of the housing area itself. There could also be benefits from the housing sharing the car parking provided for any commercial uses on site as this would require less land take overall.	The SEA will put forward that other opportunities which lead to having a less car-dominated environment should be promoted. Decision Making Criteria / sub-objectives for each of the SEA Objectives will be developed to help steer the assessment, which will include for example, methods of minimising cars on-site.
	Density of development - this is very important, not just for maximising the benefit of the development in meeting housing need, but also for providing a community that has enough residents to be able to support a commercially viable bus service. This is even more important with the pressures on local authority budgets and the likelihood that the Council is not going to be able to subsidise bus routes in the future. Any development needs to be able to support commercial bus services not just at the busiest times, but also regular (at least half hourly and preferably more frequent) evening and Sunday services, so that residents have a real choice of transport and don't necessarily feel compelled to own a car. This will also be a factor to be considered when assessing the scheme's overall carbon emissions.	Comments noted and supported. The Transport & Travel section will be updated to include a reference to the importance of ensuring a bus service is commercially viable. The Housing section will be updated to include a reference to ensuring densities make the maximum use of the site and ensure a viable sustainable community in relation to sustainable transport provision, community facilities and other services. The Climate Change section will be updated to include a reference to the creation of sustainable communities.
	Design and density of housing - this is important in assessing the overall resource use and carbon emissions of the development as blocks of flats and terraced housing normally require less resources per unit compared with detached dwellings as they have shared walls	Comments noted. The Waste section Issues and Opportunities sections will be updated to include a reference to resource use.

	and therefore fewer external walls. This should result in them having a better thermal performance.	The Climate Change opportunities section will be amended to include a reference to different types of housing and energy efficiency.
	Access to local services - creating a self-sustaining local community which has access to many of the local services it needs on site, or easy ways of accessing them nearby, preferably without a car. This will be an important factor in reducing the development's carbon and ecological footprint. It will also create a more vibrant local community.	Comments noted and supported. The creation of a sustainable community is discussed in various sections although is not explicit, including Ecological Footprint, Climate Change, Transport & Travel, Health and Education. Additional references to the importance of creating a sustainable community will be added throughout these sections.
	Multi-functional space and buildings - given the pressures on space in the city, maximum effort should be made to create buildings and space that can be used for a variety of purposes at different times of the day and days of the week. For example, any school sports pitches and grounds should be open and available for the local community to use, much in the same way that residents can use the Stringer / Varndean/ Balfour campus. There is a real shortage of sports pitches and open space in the city and this could be a way of helping meet the site's open space requirements. Buildings should also be designed so that they can be used for the benefit of the local community or adaptable should the requirement for which they were originally built change over time. Helping make the school buildings available to the public in the evenings and weekends can help integrate it better into the local community as well as making better use of scarce resources.	Comments noted and supported. Additional reference to the potential for dual use and maximising resources through shared-use of space added to Open Space and Waste sections. The SEA Objective "to make the best use of previously developed land", which was proposed to be deleted is now proposed to be amended to "to make the best use of land available" to assess the issues identified.
	In all of the above cases, the Strategic Environmental Assessment needs to be steering the SPD down these policy directions in order to deliver truly sustainable development. Unfortunately, BHFOE is not convinced that the current scoping report will do this and believes that	Additional references added as outlined above.

	it should be amended to contain specific reference to these issues	
Trustees for Toads Hole Valley and Pecla Investments	We strongly object to the SEA and its Scoping Report. The Scoping Report states (more than once, see e.g. Page 4) that the SPD "sets the development framework for future consent of projects". This is the stated reason for why the Council considers that SEA is required. However it demonstrates that the SPD will contain to some or other extent policies to guide the determination of a future planning application. Therefore the very reason why the Council considers SEA is required demonstrates that the document is not lawfully an SPD.	Comments noted. The rationale for the requirement for SEA is based on that the SPD is considered to accord with Regulation 5 (2) (a) and (b)[1] and does not accord with Regulation 5 (6) (a) or (b)[2] (in that the site is not considered to be a small area at local level nor is the SPD a minor modification). The wording with regards to "setting a framework" and wording regarding "setting policies" has been removed from the SEA screening.
	Notwithstanding this legal matter relating to the SPD, we do not consider a SEA is required. The National Planning Policy Guidance (NPPG) states that SEA's are required in some limited situations where a SA is not needed. This is usually only where a SPD could have significant effects on the environment. This is only in exceptional circumstances if the significant environmental effects have not already been assessed during the preparation of a Local Plan. In our view the THV environmental effects have been assessed during the preparation of the City Plan and the SA that accompanies the Plan.	Comments noted. As outlined above, the rational for the requirement of SEA is based on that the SPD is considered to accord with Regulation 5 (2) (a) and (b) and does not accord with Regulation 5 (6) (a) or (b). When a plan or programme is of this description as set out in the Regulations, the requirement for SEA is triggered without the need to determine (under Regulation 9(1)) the likelihood of significant environmental effects.
	In addition, the NPPG states that before deciding whether significant environmental effects are likely – the Local Planning Authority should	As outlined above, and as described in Appendix A of the Scoping Report, a

[1] **(2) The description is a plan or programme which**

(a) is prepared for… town and country planning purposes, and

(b) sets the framework for future development consent for projects listed in Annex I or II to the Council Directive 85/337/EEC on the assessment of effects of certain public and private projects on the environment as amended by Council Directive 97/11/EC(a)

[2] **(6) An environmental assessment need not be carried out**

(a) for a plan or programme of the description set out in paragraph (2) or (3) which determines the use of a small area at local level; or

(b) for a minor modification to a plan or programme of the description set out in either of those paragraphs

	take into account the criteria specified in schedule 1 of the Environmental Assessment of plans and Programmes Regulations 2004 and consult the consultation bodies. I am not aware the City Council has done this.	determination of the likelihood of significant environmental effects under Regulation 9(1) of the Regulations has not been carried out. A determination of this type if not required for a plan or programme of the type described under Regulation 5 (2) unless the plan concerns a small area at local level. In relation to other sites within Brighton & Hove, the Toad's Hole Valley site is not considered to be small site at local level.
	The Scoping Report covers social and economic matters. Our understanding is that a SEA should just be kept to the effects on the environment.	In addition to a range of environmental topics, the SEA is required to cover some social issues including population and human health [3]. Some economic issues are intrinsically linked with population and human health and have been included for this reason.
	In addition, the Scoping Report refers to issues that are irrelevant to the THV such as the impact on the Air Quality Management Area. This is not located close to THV.	Comments noted. It is agreed that the THV site is not located close to the AQMA boundary. The Air Quality section states the site is not included within the AQMA. It will be made clearer that the site is not in close proximity to the AQMA and that development in this location is unlikely to have a direct impact upon its designation. However, the text stating the SPD will need to take account of any indirect effects on the AQMA will remain.
Sussex Wildlife Trust	The Sussex Wildlife Trust agrees that a Strategic Environmental Assessment (SEA) is required for this SPD and have the following	Comment welcomed.

[3] **Schedule 2 of the Regulations lists issues to be addressed in the Environment Report.**

	comments to make about the scoping report:	
	<u>Section 2 – Plans, Policies, Strategies and Guidance influencing the SPD</u> We are very encouraged to see 'Securing the Future: delivering UK sustainable development strategy' listed as document of relevance to the SPD (page 7). The scale and distribution of the Toad's Hole Valley development should be planned and delivered in a sustainable fashion, based on the twin driving elements of sustainable development as set out in Securing the Future: Living within environmental limits and Ensuring a strong, healthy and just society	Comment noted.
	However we are concerned that there seems to be no reference to green infrastructure in the list of plans and strategies influencing the SPD. In particular the Brighton & Hove Green Infrastructure Network Study (2009) which is listed as a Supporting Evidence Document for the City Plan part 1. The development site links to the Brighton & Hove Urban Green Network Biodiversity Opportunity Area via the Toad's Hole Valley Local Wildlife Site and therefore potential impact on the city's green infrastructure should be a consideration. In particular the Implications for the SEA should be amended to state that the '*SEA framework should include an objective relating to open space* ***and green infrastructure*** *provision*' (page 10). This is especially relevant given that enhancing the green infrastructure network is one of the Biosphere Management Strategy's top priorities.	Comment noted. A reference to the Brighton & Hove Green Infrastructure Network Study (2009) will be added to Section 2. Comment noted. Reference will be amended as suggested. SA Framework Objective 3 will be amended to include Decision Making Criteria / sub-objective relating to green infrastructure.

	<u>Section 4 - Sustainability Issues in Brighton & Hove of most relevance to the SPD</u> The Sussex Wildlife Trust is encouraged to see that the impact of the development on the city's ecological footprint will be considered and supports the aim for the SPD to contribute towards reducing the ecological footprint of the development.	Comments welcomed.
	We are also pleased to see Biodiversity listed in the Environmental Issues table, however we would ask that the table is amended to state that '*The SPD **should** provide opportunities to protect any important features of the SNCI…*' and '*The SPD **should** provide opportunities for greater involvement in nature conservation…*' rather than '*could*' (page 17). This would bring the SPD in line with paragraph 117 of the NPPF.	Comments noted. Text amended as suggested. Other text amended from "could" to "should" in line with the NPPF where appropriate.
	The Trust would also like to see acknowledgement of access to nature as an important indicator of health within the Health section of the Social Issues table (page 21). In particular that the SPD will provide the opportunity to influence some of the wider determinants of health through good green infrastructure and access to multifunctional local green space.	Comments noted. A reference to the link between access to green open space and health will be added to the Health issues section and the opportunities section will be updated to refer to the wider determinants of health.
	Open Space is considered multiple times through the scoping report, but it needs to be acknowledged that green infrastructure means more than just open space.	Comment noted. Additional text regarding green infrastructure will be added to the Open Space, Biodiversity and Water Resources sections.

	Section 5 - Framework to assess the SPD We agree with the table of SA Objectives and their relevance to the SPD. We are particularly encouraged to see the objective '*To prevent harm to existing biodiversity and achieve a net gain in biodiversity*.' included in first place on the table.	Comments noted. It should be noted that order of SEA objectives does not necessarily denote order of importance.
	Appendix C - Objectives, indicators and baseline information We question whether the '*number and area of designated sites (SAC, SSSI, SNCI, LNR, NP, RIGS and MCZ) presented as a percentage of the total administrative area of Brighton & Hove where known*' is a sufficient indicator of *Objective 1: To prevent harm to biodiversity and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people* (page 63). The percentage of designated sites in positive conservation management should also inform the baseline data for the SEA as this would demonstrate the baseline for where net gains to biodiversity could be made. A local designation for example, does not automatically prevent harm to biodiversity or create net gains on that site. Much of this information can be provided by Natural England (SAC & SSSI) and BHCC (SNCI & LNR). Measurable trends should also be available for this indicator along with targets. For example some of the goals from the Biodiversity 2020 strategy – quality goals for priority habitat and Sites of Species Scientific Interest (SSSI), at least 200,000 ha increase in priority habitat and the restoration of 15% of degraded ecosystems.	Comment noted. This high level indicator is kept for wider context. Comments noted and welcomed. The following indicator and relevant data will be added to objective 1: Number and percentage of sites where positive conservation management is being or has been implemented in the last five years. Additional information on targets and trends of the extent of protected areas will be added.
	We would also recommend that the Sussex Biodiversity Record Centre be listed as a source for data	The Sussex Biodiversity Record Centre was not used as a data source at this stage but

		will be used for future information.
	Similarly the Green Infrastructure Network Study (2009) should be a source of data for the '*Extent of natural and semi natural green space found in the council area (including hedgerows).*	Added as suggested.
National Trust	Overall, The National Trust considers that the Scoping Report has identified the key opportunities and issues that the SPD will need to address in progressing its aim of a sustainable mixed use development at the Toad's Hole Valley site.	Comments welcomed.
	The only matter that the Trust considers that the Scoping Report does not seem to address is lighting. The South Downs National Park Authority (SDNPA) is currently looking to bid to become a Dark Sky Reserve and the National Trust is supporting the SDNPA in this project. The Scoping Report makes no reference to ensuring that light pollution from the development is minimised and to particularly address the issue of light spill, given its proximity to the National Park boundary. The National Trust considers that this issue should be addressed through any SPD as there is potential for such a quantum of development and the mix of uses proposed to have a significant environmental impact on the level of light pollution/spill experienced from the National Park, particularly given that the area is currently a greenfield site. The Trust hopes that this matter can be considered in any future documents to ensure that the impact of the development on the character of the National Park is minimised and appropriate mitigation provided.	A reference to the SDNPA bid to becoming a Dark Sky Reserve will be added to the Landscape section. The Landscape opportunities section will include a reference to ensuring lighting in this location does not adversely impact on the SDNP, through implementation of techniques such as low-reflective surfacing and lighting orientation, in accordance with local council lighting strategy.
English Heritage	On the basis of the information provided within the scoping report, we do not think the proposed development is likely to have significant impact on designated heritage assets. We note however the potential for discovery of undesignated buried archaeological remains in the area of the proposed development. It is therefore important that that the County Archaeological Advisor is	Comments noted. A reference to the Cultural Heritage section will be added to highlight the potential for undesignated buried archaeological remains in this area and the need for an assessment will be required prior to any development

	invited to give pre-application advice and that a thorough assessment of potential impacts to undesignated heritage assets is included in any pre-development work.	taking place.
BHCC Sustainability Team	Make use of Food Strategy statistics in the Sustainability Issues section to highlight the need for a sustainable food approach.	Some statistics added to the following issues sections: waste, ecological footprint, open space and health.
	Incorporate the following key messages from City Plan Policy DA7 (modified): Requirement for development to aim to be an exemplary standard in terms of environmental, social and economic sustainability; requires environmental sustainability to be central to the design and layout of the scheme;	Reference added to Section 2 Plans, Policies and Guidance section.

	Add the following: <u>Water, soil and waste:</u> Should aim to be 'water neutral' (CP8) Incorporate measures for composting (CP8) Incorporate sustainable drainage measures <u>Biodiversity:</u> Should incorporate opportunities for green infrastructure to increase biodiversity & provide climate adaptive solutions (sustainable drainage, minimisation of urban heat island, energy efficiency) <u>Health:</u> Minimise overheating, e.g. through passive design: passive ventilation, shading etc (CP8) Use natural materials that moderate temperatures and avoid offgassing (CP8) <u>Climatic factors:</u> Aim to incorporate infrastructure to support low and zero carbon decentralised energy (DA7) <u>Open space</u>: Provide opportunities for food growing and communal activity around this (e.g. allotments/community food growing space) (CP8) Add something specifically on decentralised energy/heat networks as it's an important means to deliver low carbon development efficiently. NPPF: 93. Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising	Comments incorporated as suggested where not already included.

	vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development. The DA7 policy includes the following: aim to incorporate infrastructure to support low and zero carbon decentralised energy and in particular heat networks CP8: 2. All development proposals including conversions, extensions and changes of use are required to demonstrate how the development: … d. connects, makes contributions to low and zero carbon energyschemes and/or incorporates provision to enable future connection to existing or potential decentralised energy schemes;	

BHCC Flood Risk Management	**Flood Risk:** The site is located on Flood Zone 1. There are no flood defences located on the site. Parts of the site are indicated to be at high risk of surface water flooding. The Environment Agency's updated Flood Map for Surface Water (uFMfSW). High means that each year, this area has a chance of flooding of greater than 1 in 30 (3.3%). This type of flooding can be difficult to predict, much more so than river or sea flooding as it is hard to forecast exactly where or how much rain will fall in any storm. The uFMfSW map is intended as a **guide** of areas at risk of flooding. The hydraulic model used to produce these outlines **has not** been refined for localised areas in Brighton and Hove City. The suitability of the uFMfSW for this area has been defined as "county to town". This means the uFMfSW at this location is suitable for identifying approximate extents, shallower and deeper areas but is unlikely to be reliable for a local area and is very unlikely to be reliable for identifying individual properties at risk. (see What is the updated Flood Map for Surface Water? – pp28,29). . Brighton & Hove City Council has been unable to locate records of previous flooding at this location. **Geology:** The site is underlain by the Newhaven Chalk Formation and the Seaford Chalk Formation and is within the EA's major aquifer intermediate vulnerability zone. Consequently, the area may be susceptible to groundwater emergence. The EA groundwater susceptibility map indicates the site is unlikely to be susceptible to groundwater flooding. There are no reported incidents of	Relevant information added to Flood Risk section.

	groundwater flooding in the area. **Recommendations** Any development on this site will require a Flood Risk Assessment to support a planning application. It is vital that sustainable drainage (SuDS) **is considered from the beginning and incorporated into a master plan at the earliest stage**. The **Sustainable Drainage Systems Non-statutory technical standards for sustainable drainage systems (March 2015)** recommend the following **-** • **Peak Runoff** : For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1 year rainfall event and the 1 in 100 year rainfall event should never exceed the peak greenfield runoff rate for the same event. • **Volume Control** - Where reasonably practicable, for Greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6-hour rainfall event should never exceed the Greenfield runoff volume for the same event. Future development in the area is likely to be redevelopment. There is no fluvial or tidal risk associated with the site. However, the area appears to be at risk from surface water flooding. Any future development should ensure that it would not increase the surface water flood risk elsewhere. **Points to note**	

	The site is located at the top of a valley system, any development that does not consider the potential impact of increased surface water run-off will result in an impact downstream of the development. It may be necessary for the BHCC to consider adoption of any sustainable drainage proposed, which will require a Section 106 agreement with the developer to fund the maintenance of the SuDS **for the <u>lifetime of the development.</u>**	

Appendix D Issues and Options Assessment

This assessment should be read alongside the Issues & Options put forward during consultation. A copy of the Issues and Options can be found in Section 3. The SEA notes that the options were drafted to stimulate debate and may not be reflective of any final SPD.

For each sustainability objective, there is a combined assessment of all the issues (e.g. housing, transport and so on) for the three options presented: option1, option 2 and option 3 against the Sustainability Framework set out in Section 2. There is a summary for each SEA objective to highlight which aspects of the options are considered to have a particular affect. This will be fed into the development of the draft SPD in order to maximise beneficial or reduce potential for adverse impact.

Assumptions:

- Assume that all aspects of City Plan requirements will be delivered in all options.
- Assume that all aspects of options 2 and 3 will also be delivered.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
1. To prevent harm to and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.	-/+?	There could be adverse effects on biodiversity resulting from DA7, as the policy results in development of a greenfield site, which could be of some biodiversity value and will need to have an ecological assessment to determine its value. The site includes the SNCI, which was originally designated as calcareous grassland, however its condition has become	-/+?	As with options 1 and 3, there could still be adverse effects on biodiversity resulting from a broad brush SPD, due to the quantums of development that are required to be delivered. The broad brush SPD would provide ideas for how biodiversity enhancing features could be integrated into the design of streets and public spaces as well as bio-diverse SUDS, which could have	-/+?	As with option 1 and 2, there could still be adverse effects on biodiversity resulting from a detailed SPD, due to the quantums of development that are required to be delivered. Detailed SPD would provide broad locations and links to form a basic network of streets and open spaces, in order to provide greater connectivity for wildlife

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		degraded through lack of management and has become encroached with scrub. DA7 requires that opportunities to maximise biodiversity through planting and landscaping are incorporated through the site, and requires the SNCI to be conserved and enhanced (which will be through developer contributions). Citywide policy CP10 Biodiversity requires improvements throughout the NIA (which includes the SNCI) which should lead to positive effects; and requires development to conserve existing and provide net gains for biodiversity where possible. Overall impacts are considered to be mixed and uncertain, and will depend upon the results of ecological assessment of the site, however City Plan policies have potential to provide		beneficial impacts by both increasing biodiversity and increasing day to day access to biodiversity for people. Broad brush SPD would consider long-term maintenance of the SNCI, which could have beneficial impacts. Identification of a network of green corridors throughout the site could have beneficial impacts through allowing movement, and again through enabling access to nature for people. Additional guidance provided by the SPD could have greater beneficial impacts than Option 1, however impacts are still considered to be mixed and uncertain and would depend upon the biodiversity value of the site which needs to be informed by Ecological		between different parts of the site. The detailed SPD would also provide guidance on where SUDS should be located in relation to other types of development. These would have beneficial impacts for this objective by increasing biodiversity, increasing day to day access to biodiversity for people and recognising the multi-functional benefits of ecosystem services. Overall, a detailed SPD could have greater beneficial impacts when compared to Options 1 and 2, however impacts are still considered to be mixed and uncertain and would depend upon the biodiversity value of the site. If the master plan was informed by an Ecological Assessment, it could ensure that any areas of particular

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		mitigation for adverse impacts.		Assessment.		biodiversity importance on the main site were avoided, and that development is directed to areas of the least value for biodiversity. The results of an Ecological Assessment would also highlight whether there needs to be sites to accommodate certain types of biodiversity, e.g. should translocation be required for example and this could then be considered by the SPD when identifying broad locations.
Summary	There is not considered to be much difference between impacts arising from the 3 options. Option 3, has the potential for more significant positive effects than the other two options, but only if it is informed by an Ecological Assessment. If it was informed by an Ecological Assessment, this could ensure that the locations identified for certain types of development are those with the least biodiversity value, and could also provide detailed information on the types of sites/features that should be included, or types of planting that should be included for example, in order to provide net gains in biodiversity and minimise adverse impacts.					
2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by	-/+	DA7 will result in delivery of housing, employment and a school, all of which will increase the number of journeys to and from the area which could result in adverse	-/+	As with options 1 and 3, there could be adverse effects on air quality in and around the site due to the quantums and types of development that will be delivered and the likely	-/++	As with options 1 and 3, there could be adverse effects on air quality in and around the site due to the quantums and types of development that will be

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
means of transport and land use planning.		effects on air quality either on or around the site. It is recognised that the site is situated in an area of the city where air quality is currently good, is not in close proximity to the AQMA, and although is situated adjacent to the A27 and other key routes in and out of the city, existing topography and the form of the landscape allows for dispersal of traffic borne air pollutants. It will be important to ensure that current air quality is maintained in this location. DA7 requires improved sustainable transport links to be delivered and requires development to address traffic impacts which could have positive impacts on this objective. Policy CP9 Sustainable Transport requires all major development schemes to		increase in journeys around the area generated by the development on site. Broad brush SPD which contains guidance on the types of design features that could be delivered which have benefits for air and noise quality would have beneficial impacts for this objective. Also, identification of improvements to cycling and pedestrian network, bus network and road network in and around the site, as well as ideas that could reduce car ownership and maximise sustainable travel would all have beneficial impacts for this objective through potentially minimising the sources of air pollution. Overall impacts are considered to be mixed and considered to be similar to Option 1. This option is unlikely to “improve”		delivered. A detailed SPD which identifies broad locations where building design should incorporate features to mask noise and reduce the impact of air pollution would have beneficial impacts for this objective. Also, identification of key routes, connections and crossings that would facilitate movement by public transport, cycling and walking would also have beneficial impacts for this objective through potentially minimising the sources of air pollution. Overall impacts are considered to be mixed. This option is considered to have greater potential for positive impact than other options, due to the identification of locations where certain styles

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		submit a Transport Assessment and include measures to mitigate impacts and requires a range of other measures that promote sustainable and active travel. Overall impacts are considered to be mixed. This option is unlikely to "improve" air quality, but policy measures could help to "maintain" air quality.		air quality, but measures could help to "maintain" air quality.		of building design that help to reduce the impact of air pollution should be located. Particularly if the building design helps to prevent the canyon effect. As with the other options, this option is unlikely to "improve" air quality, but measures could help to "maintain" air quality and also help reduce the impacts of air pollution.
Summary	All options are considered to have mixed impacts on air quality due to the amount of development that will be delivered in this location and the additional number of journeys this will generate, although it is recognised that all options include measures to promote sustainable transport that would potentially have positive effects on air quality. Option 3 has potential for greater positive impact through the inclusion of measures that reduce the impacts of air quality, e.g. through identification of locations where certain building designs should be incorporated, which is not included in the other options. The SPD should also explicitly avoid any design which may lead to the canyon effect in order to maximise beneficial impacts.					
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and their settings and	+	There are not considered to be any impacts on heritage due to the site's location. DA7 requires provision of 2ha of public open space, to include children's play space and informal sports facilities, as well as 0.5ha of food growing space. Development	+	This option suggests that opportunities for informal leisure and play will be incorporated into the design of streets and spaces. Overall impacts are considered to be positive as this would improve access to open space and would encourage	++	This option will identify broad locations for different types of open space. This would have positive impacts as could improve access to open space and could encourage incorporation of open space within development. This option could also help to

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
archaeological sites effectively.		of the site will result in an increase in publically accessible space in this location. Overall, impacts are considered to be positive.		incorporation of open space within development.		promote local distinctiveness by supporting development of an attractive, integrated sustainable neighbourhood having potential for significant positive impacts on this objective.
	Option 3, which identifies broad locations for the various elements required to be delivered, would provide certainty as to how and where various uses and elements could be delivered, including open space. Option 3 is considered to have the most potential for significant positive impact on this objective, through consideration of where different types of open space could be provided, but also through consideration of how the elements of the scheme link together, including identification of a basic street network, in order to make a locally distinctive and sustainable neighbourhood.					
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.	+?	A significant amount of development will be delivered on the site and this could impact upon views of or from the SDNP given its proximity. DA7 requires development to respect the setting of the SDNP and should consider the impact of development on the purpose of the SDNP. DA7 also requires contributions to improving links to the SDNP. These requirements should have a positive impact on this objective, however the impact is also considered to be	+?	This option would involve the identification of key views to and from the SDNP. It is not clear how this would be used to inform the SPD however this is likely to result in positive effects for this objective. It is not clear whether this option would include opportunities to help integrate or improve access from the site to the SDNP. Impacts are therefore also considered to be uncertain.	++?	This option seeks to identify broad locations for various uses which are sensitive to and take into consideration the impact of development on the SDNP. This option also seeks to identify key views to inform locations. These would have positive impacts on this objective. It is assumed that this option would require a LVIA to inform the SPD and therefore the impacts are also considered to be uncertain. This option also seeks to

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		uncertain and will depend on the results of a Landscape & Visual Impact Assessment that will identify measures to help to mitigate any landscape impacts.				identify a broad location for the community facility with easy access to the SDNP, to facilitate access. Overall, impacts could be significantly positive, however would rely on the SPD being informed by the results of a LVIA or similar study.
	Option 3 is considered to have greatest potential for significant positive impact, particular through the consideration of landscape and visual impacts on the SDNP when identifying broad locations for various uses. However, this will need a LVIA or similar assessment in order to inform this approach. The SDNP has recently been awarded dark skies reserve status. Mapping suggests that locations in fairly close proximity to the THV site (e.g. Devil's Dyke) already suffer from light pollution. It will be important that any development located at THV consider the impact of light pollution from development on the SDNP. This could be highlighted in the SPD.					
5. To meet the need for decent housing, particularly affordable housing.	+	DA7 requires a minimum of 700 dwellings to be delivered; to make the best use of the site with residential densities of between 50-75dph; to provide 50% 3+ bedroomed dwellings. There are no further details on the specific mix, type, or tenure to be delivered within policy DA7. DA7 states the importance of phasing and states that some employment	++	Overall, this option will result in the same amount of dwellings, including the same amount of AH units as option 1 (CPP1) and therefore the key output, in terms of housing numbers, will be the same. If this option provides further guidance on the type and tenures of housing to be delivered across the site,	++	This option would identify broad locations within the site whereby different densities, forms and scales of building could be delivered in a way that is sensitive to the SDNP. This option would require various studies to be completed to inform any approach, including studies to assess visual/landscape

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		land should be completed prior to completion of the housing element, but provides no further guidance on phasing. CP19 provides a hook for further details on housing mix to be set, but does not provide guidance on the type, size and tenure of housing that should be delivered on specific sites. CP20 requires affordable housing provision on sites of 5 or more dwellings, with 40% onsite affordable provision on sites of 15 or more dwellings (potentially resulting in 280 units at THV); requires AH units to be integrated and should incorporate a mix of tenures, but there are no further details on the proportion of different tenures. CP20 provides some guidance on the preferred size of AH units to be delivered across the city, but states that the mix on individual sites will be determined through		relative to locally identified needs, then this option could have greater positive impacts than option 1, as this detail is not provided in CPP1. This option could also have greater beneficial impacts than option 1 if it provides further guidance on Starter Homes, which are currently not referred to in CPP1. This option could have greater beneficial impacts than option 1 if it included guidance on phasing, particularly of uses that would support delivery of a sustainable neighbourhood. (see objective 20)		impacts; viability and capacity studies. There is considered to be little difference between the scores for this option and option 2 against this SA objective. A Masterplan Approach is likely to have greater beneficial impacts for site based objectives (e.g. environmental objectives) however is still likely to result in the same outputs as options 1 and 2 in terms of numbers of dwellings that will be delivered.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		negotiation.				
Summary	The inclusion of up to date guidance on the mix of housing types and tenures which would help meet local housing needs has the greatest potential for improving the positive effect when compared to option 1. Other effects on this SA objective are considered to be the same across all options, as all are considered to result in the same key output, in terms of total number of dwellings.					
6. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed use, car-free and higher-density development.	-/+	See also ob 2. DA7 will result in delivery of housing, employment and a school, all of which will increase the number of journeys to and from the area potentially having an adverse impact on this objective. However, delivery of a mixed-use scheme, which includes supporting uses allowing residents to meet day to day needs locally, including potential employment, would have positive impacts for this objective. DA7 requires improved sustainable transport links to be delivered, requires the operational performance of the trunk road to be improved, and requires development to address traffic impacts which	-/+	See also ob 2. As with options 1 and 3, there could be adverse effects on this objective due to the quantums and types of development that will be delivered and the likely increase in journeys around the area generated by the development. However, it is recognised that a mixed-use scheme could have positive effects for this objective. This option should result in the identification of network improvements needed to accommodate new development, which in itself would not reduce journeys made by cars but may mitigate some of the traffic impacts, such as congestion. However,	-/+	See also ob 2. As with options 1 and 2, there could be adverse effects on this objective due to the quantums and types of development that will be delivered and the likely increase in journeys around the area generated by the development. However, it is recognised that a mixed-use scheme could have positive effects for this objective. This option would enable identification of hierarchy of streets. This in itself is unlikely to have any impact on reducing car use. This option would include consideration of options to decrease traffic speeds. This would help to reduce the

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		could have positive impacts on this objective. Policy CP9 Sustainable Transport requires all major development schemes to submit a Transport Assessment and include measures to mitigate impacts and requires a range of other measures that promote sustainable and active travel which would also have positive impacts on this objective. Overall, impacts are considered to be mixed, reflecting the likelihood that journeys made by car will increase in this location due to the amounts of development and its proximity to the trunk road, but taking into consideration the range of measures that should be implemented which will have some effect on travel choice.		the option should result in identification of improvements required to bus services, cycle links and the pedestrian network, all of which could help to reduce journeys made by car and have a beneficial impact on this objective. The identification of examples which could be delivered across the site that could reduce car ownership/use could also have beneficial impacts on this objective. Overall, impacts are considered to be mixed, reflecting the likelihood that journeys made by car will increase in this location due to the amounts of development, but taking into consideration the range of measures that could be implemented which will have some effect on travel choice. Impacts are considered to be similar to Options 1 and 3.		impacts of traffic, but would be unlikely to have any impact on reducing car use and may lead to a displacement of traffic. This option would include identification of design opportunities for roads and parking that help to encourage travel by other means, and this could have a positive effect on this objective. Overall, impacts are considered to be mixed. Impacts are considered to be similar to options 1 and 2.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
	All options are considered to have mixed impacts on this objective due to the amount of development that will be delivered in this location and the additional number of journeys this is likely to generate, although it is recognised that all options include measures to promote sustainable travel. Neither options 2 or 3 are considered to include measures that would significantly change the score when compared to option 1. The greatest potential for positive impact is likely to be identification of examples that could be delivered across the site that could reduce car ownership/use, e.g. “homezone” type approach or designated parking areas away from residential properties. Measures which reduce traffic speeds on adjacent roads could lead to a displacement of traffic and impacts.					
7. Minimise the risk of pollution to water resources in all development.	+	The site is not considered to be at risk of groundwater flooding however the south-western tip of the site is susceptible to surface water flood risk in a 1 in 30 year event (with greater extents of flood risk in the 1 in 100 year event). The site is situated at the top of a valley system, therefore it will be important to ensure that flood risk further down the valley system is not increased as a result of any development on the site. DA7 requires that groundwater source protection zones are protected from pollution, and development does not result in an increase in surface water run-off and flood risk.	+	This option will provide guidance on the types of sustainable drainage features that could be incorporated to prevent surface water flood risk and how these features can be incorporated into the street design. This is considered to have positive impacts on this objective. Effects are considered to be similar to Option 1.	++	This option will provide guidance on SUDS which will be based on the broad locations identified for the various other uses. This option will ensure that flood risk measures (SUDS) are considered at an early stage and incorporated into a masterplan in locations where they will have the greatest effect. This approach should also ensure that broad locations identified as being suitable for certain uses are those that avoid areas of highest flood risk. Overall, this option has the greatest potential for

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		CP8 Sustainable Buildings requires development to reduce water pollution and safeguard water supply. CP11 Flood Risk requires development to include appropriate SUDS in order to avoid and reduce flood risk. Overall, impacts are considered to be positive.				significant positive effect on this objective. The SPD could be strengthened further by referring to the need to help prevent flood risk further down the valley system.
	Option 3 is considered to have the greatest potential for significant positive effect. This option will identify broad locations suitable for different uses, and this would be informed by the constraints of the site, which includes flood risk. There is data available for flood risk on the site, however a more detailed site specific flood risk would be required to fully inform the development. This option would enable SUDS to be considered at an early stage and should ensure SUDS are fully integrated into development. The SPD would be strengthened further by referring to the need to help prevent flood risk further down the valley system.					
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.	+	DA7 will result in delivery of significant amount of development, which will increase demand for water at operational stage. DA7 requires the development to be of an exemplary standard in terms of environmental sustainability. CP8 Sustainable Buildings requires residential development to meet	0	This option does not refer to ways in which water could be minimised. This is likely to be outside of the scope of the SPD.	0	This option does not refer to ways in which water could be minimised. This is likely to be outside of the scope of the SPD.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		110l/person/day and non-residential development on a greenfield site to achieve BREEAM Excellent standard. In addition, all development is required to aspire towards water neutrality and incorporate measures to recycle/harvest water. Overall, policies should lead to water use being minimised and therefore impacts positively towards this objective.				
	Options 2 and 3 do not include any measures relating to minimising water consumption. Option 1 therefore provides the greatest potential for positive impact against this objective. The SEA does not consider there to be any measures which could be included in the SPD which would have a greater beneficial impact when compared to Option 1 due to the nature of this objective.					
9. To promote the sustainable development of land affected by contamination.	+?	CP8 requires development to reduce land pollution and would therefore have a positive effect if contamination was an issue on the site. It is unknown whether the site has any potential for contamination. It is currently a greenfield site and therefore potential for contamination is	0	This option does not refer to ways in which land could be remediated if needed. This is likely to be outside of the scope of the SPD.	0	This option does not refer to ways in which land could be remediated if needed. This is likely to be outside of the scope of the SPD.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		likely to be low. However this is likely to require investigation at application stage should it become apparent that the site has potential for contamination.				
	Options 2 and 3 do not include any measures relating to redeveloping contaminated land. Option 1 therefore provides the greatest potential for positive impact against this objective. The SEA does not consider there to be any measures which could be included in the SPD which would have a greater beneficial impact when compared to Option 1 due to the nature of this objective.					
10. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment. **And** 11. To support initiatives that combine	++	DA7 requires a site area of 3.5-4.5 ha for employment space to be provided and for that office space to be high tech, modern and of a range of sizes. The site is considered capable of delivering 25,000sqm B1 floorspace. The policy indicates that the employment area would be delivered in one area, and that this would be in close proximity to the trunk road. DA7 states that one of the priorities is to provide training and job opportunities for local people and the developer is	+?	This option seems to suggest that there could be a network of locations across the site providing a range of different office needs and that these would be incorporated into mixed-use development. Providing a range of different types of office floorspace would have a positive impact on this objective and would help to create a sustainable community where uses are integrated, however seems to differ from the requirements of DA7 which suggests one key employment site.	++	This option will identify a broad location for an employment hub that incorporates a range of office types. This is considered to have significant positive impacts on this objective.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors.		required to enter into a training agreement for local people. The option is considered to have significant positive impacts on this objective and it is recognised that temporary job opportunities will be provided at construction stage.		Impacts are considered to be positive but uncertain due to the difference between policy DA7 requirements and the proposals of this option.		
	Although positive, the impacts of option 2 are considered to be uncertain due to the option not being consistent with DA7. The impacts of options 1 and 3 are considered to be broadly similar, with both likely to have significant positive impacts for employment and economic development. The identification of a broad location for an employment hub at an early stage could help to ensure the various uses are integrated as fully as possible, and also consider providing for other uses, such as off-street parking/park and ride.					
12. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap between those with the poorest health and the rest of the city.	+	DA7 will deliver many of the social determinants of health including housing, training and employment opportunities, as well as deliver opportunities to facilitate healthy/active lifestyles such as open space and improved sustainable transport links, and social capital in the form of a community building and health facilities. DA7 also requires	++	As with option 1 and 3, many of the determinants of heath will be delivered and outcomes, in terms of quantums of development will be the same. If this option provides further guidance on the type and tenures of housing to be delivered across the site, relative to locally identified needs, then this option could	++	As with option 1 and 2, many of the determinants of health will be delivered, and outputs, in terms of quantums of development will be the same. A detailed SPD which identifies broad locations where building design should incorporate features to mask noise and reduce the impact of air pollution would have

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		development to address issues relating to highway safety and traffic impacts from the A27, which will include noise and air quality. CP18 A Healthy City requires a Health Impact Assessment on all strategic developments, and encourages developments to work towards Lifetime Neighbourhood principles, which promotes healthy and active living for all ages.		have greater positive impacts than option 1. If this option contains guidance on the types of design features that could be delivered which have benefits for air and noise quality this would also have beneficial impacts for this objective. Also, identification of improvements to the cycling and pedestrian network, bus network and road network in and around the site, as well as ideas that could reduce car ownership and maximise sustainable travel would all have beneficial impacts for this objective. Further guidance on phasing of essential and supportive infrastructure and supporting uses would have a positive impact on this objective through enabling access to various service/uses for new and existing communities.		beneficial impacts for this objective. Also, identification of key routes, connections and crossings that would facilitate movement by public transport, cycling and walking would also have beneficial impacts for this objective through facilitating healthy lifestyles and potentially minimising the sources of air pollution. This option would provide clarity in terms of what infrastructure and supporting uses are required and when. This would have a positive impact on this objective through enabling access to various services/uses for new and existing communities.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
	Overall, options 2 and 3 have potential for greater significant positive impact than option 1. Further detail will be provided on measures that have direct or indirect health benefits and which support healthy lifestyles, such as measures to reduce air and noise pollution, and measures which promote active lifestyles. The inclusion of up to date guidance on the mix of housing types and tenures which would help meet local housing needs also has potential for improving the positive effect on health when compared to option 1. In addition, guidance on phasing would provide clarity on when supporting uses will be required and would help to facilitate delivery of a sustainable neighbourhood will also impact positively on this objective.					
13. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.	+	DA7 states that improvements to road safety are a priority for the area and requires development to address highway safety on King George VI Avenue. CP12 Urban Design requires development to incorporate features that deter crime and disorder or design out crime.	++	This option would aim to create pedestrian and cyclist friendly environments, which would assist with road safety. This option would provide guidance on how opportunities for informal leisure and play could be incorporated into street spaces, which would have positive effects on this objective through promotion of community activity. In addition, the use of school facilities to be used outside of the school day could help to deter crime through promoting greater activity at different times of the day with opportunities for natural surveillance. This option would identify opportunities for active street	++	This option would consider road design options that help decrease traffic speeds, which would assist with improving road safety. This option would ensure office space is integrated through the site, in addition to an employment hub. This helps to ensure that different types of activity take place at different times of the day, providing natural surveillance. As with option 2, this option promotes the use of the school outside the school day which could help to deter crime through increased opportunities for natural surveillance.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
				frontages to be delivered across the site, which would also have positive effects on this objective, again through natural surveillance. This option would provide opportunities to link with existing neighbourhoods, having potential to promote community cohesion. Overall, measures outlined in this policy have potential to have greater beneficial impacts for this objective than option 1.		A detailed SPD which identifies broad locations for various uses could help to design out or deter crime if it considers how different combinations of uses could work at different times of the day and to aid delivery of an active and busy neighbourhood, with natural surveillance. Deterring crime should be a consideration when identifying broad locations.
	Both options 2 and 3 have a number of measures which are likely to have an indirect impact on supporting community safety and minimising crime, such as measures which integrate different uses, promote active streets and provide natural surveillance. Option 2 has little information as to how safety on King George VI Avenue would be addressed whereas Option 3 would consider options that reduce traffic speeds, and if this is achieved this would result in particularly significant beneficial effects for this objective. The ability to design out crime should be a consideration in whichever option is pursued, and particularly if Option 3 is pursued, broad locations should consider crime and deterring crime when identifying suitable locations for uses.						
14. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously	+	The site is located adjacent to an area in Hangleton which has high levels of deprivation (within the 10% most deprived – overall deprivation, and within the 10% most deprived	+	This option should provide guidance on the mix of housing to be delivered across the site which would help meet identified needs, and this could have a positive effect on	+	This option would ensure that office space is integrated with the surrounding areas, which could have a positive effect on this objective. This option would identify key

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
disadvantaged by where they live.		for other domains including employment, income, health and living environment). It is also situated adjacent to an area in Hove Park with very low levels of deprivation (20% least deprived – overall deprivation). DA7 states that one of the priorities is to provide training and job opportunities for local people and the developer is required to enter into a training agreement for local people. Training and meaningful employment could help to reduce some aspects of deprivation. In addition, delivery of housing, including affordable housing could help to reduce housing deprivation.		reducing housing based deprivation. Measures which facilitate healthy lifestyles, such as improved pedestrian and cyclist network, could have a positive effect on this objective particularly on the health domain, however only if they improved access for existing adjacent communities where health deprivation is high.		routes and crossing/connections which could help link the site to adjacent areas.
	All options are considered to result in similar impacts. Neither options 2 or 3 have any specific measures that would result in a significantly positive effect for this objective, and any effects would arise indirectly, e.g. through provision of housing or employment opportunities, or through measures that facilitate more active lifestyles, but again would only support a reduction in relative deprivation if existing communities benefitted from the opportunities.					
15. To engage local communities into the planning process	+	City Plan was produced in accordance with the adopted SCI.	+	Development of broad brush SPD will provide the opportunity to engage with	+	Development of a detailed SPD will provide the opportunity to engage with

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
				local communities.		local communities.
	All options are considered to have similar beneficial impacts and all either have carried out, or will result in community engagement.					
16. To make the best use of land available	+	DA7 requires a minimum of 700 dwellings to be delivered; to make the best use of the site with residential densities of between 50-75dph. The site is also required to deliver a 3.5-4.5ha site for B1 employment space, public open space, food growing space as well as ancillary uses. In order to deliver the various policy requirements the most efficient use of the site will be required and it will be in the developer's interest to deliver the maximum amount of dwellings that the site can support.	+	This option would provide guidance on housing densities to be delivered across the site. This option would identify a network of locations across the site where a range of office needs could be delivered. This option would explore the possibility of sharing/combining uses and spaces, e.g. school space being used for other uses outside school times which would make good use of the land available. There is not considered to be any difference in terms of score against this SA objective between options 1 and 2.	++	This option states that housing delivery will be maximised through identification of broad locations, although it could be assumed that it would be in the developer's interest to maximise housing delivery. This option would result in the identification of a broad location for an employment hub as well as other locations for office space across the site. This option would also identify broad locations for the school site, community facility, would consider how other supporting uses and a network of public spaces are integrated across the site, all of which should impact positively on this objective. Overall, this approach is more likely to make more efficient use of the site. It

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
						should prevent piecemeal development that does not work efficiently and is not as well integrated with other elements of the scheme. This option should result in greater beneficial impacts for this objective than options 1 and 2.
	Overall, the approach outlined in option 3, which identifies broad locations for where the various quantums of development required could be delivered, should prevent piecemeal development which could result in inefficient use of the land available and which may not deliver all the elements of the scheme in a way which ensures the site is well connected and integrated. This option would provide the most beneficial impacts for this objective.					
17. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings.	+	DA7 will result in the delivery of a significant amount of new development. Any new development will result in an overall increase in the city's energy consumption. DA7 requires development to be an exemplary sustainable development. DA7 requires environmental sustainability will be central to the design and layout of a scheme. DA7 expects schemes to meet requirements of policy CP8.	+	This option would identify potential opportunities for the design and layout of the development to result in delivery of sustainable buildings. In relation to this objective, this could relate to orientation and passive design for example. Impacts of this option are considered to be positive, however are not considered to differ significantly from option	++?	This option would provide guidance to ensure that the design and layout of the development supports high standards of building design and supports generation of decentralised low and zero carbon energy, including district heating networks. Information provided on how a district heating network could be delivered across the site would impact positively for this objective and could

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		DA7 requires development to aim to incorporate decentralised energy infrastructure, in particular energy and heat networks (subject to viability). CP8 requires new residential development to achieve a 19% reduction against Part L; non-residential development to achieve BREEAM excellent standard; and expects all development to address climate change mitigation, contribute to reducing the city's greenhouse gas emissions, facilitates on site low or zero carbon technologies including renewables and connects to existing energy schemes or incorporates provision to allow for future connection. All of these requirements and/or expectations of the policies in the City Plan should ensure that the impact is positive for this objective.		1, with policy CP8 expecting development to achieve greenhouse gas emission reduction through, for example, passive design and orientation, fabric performance and so on.		result in more significant reductions in energy consumption. However this option would need to be informed by a study on district heating potential and therefore the impacts are also considered to be uncertain.
	All options are considered result in positive impacts for this objective. Option 3 is considered to have greatest potential for					

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
	significant positive impact, particular through the consideration of how a district heat network could be delivered. However, it is presumed this would require a study to inform this approach and is therefore also considered to be uncertain.					
18. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.	-/+	Development of the THV site will result in the urbanisation of a greenfield site. Sites in a natural form have an important role to play in climate change adaptation through absorption of water, maintaining temperatures and helping to reduce the urban heat island effect. DA7 includes a local priority to ensure that surface water run-off and flood risk does not increase as a result of development. Supporting text states that surface water run-off should be maintained at greenfield run-off rates. The policy also requires green infrastructure to be delivered across the site, which will help adaptation. CP8 requires development to address climate change adaptation, aspire to water	-/+	This option will provide guidance on the types of sustainable drainage features that could be incorporated to prevent surface water flood risk and how these features can be incorporated into the street design. This is considered to have positive impacts on this objective. This option will also identify potential green corridors, and identify opportunities which support delivery of sustainable buildings across the site, which could also include design which supports adaptation to climate change. Effects are considered to be similar to Option 1, with mixed impacts due to the loss of a sizable greenfield site.	-/++	This option will provide guidance on SUDS which will be based on the broad locations identified for the various other uses. This option will ensure that flood risk measures (SUDS) are considered at an early stage and incorporated into a masterplan in locations where they will have the greatest effect. This approach should also ensure that broad locations identified as being suitable for certain uses are those that avoid areas of highest flood risk, therefore supporting climate change adaptation. This option will also ensure the design and layout of the development reduces the impact of the heat island effect.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		neutrality, reduce heat-island effect and reduce surface water run-off. CP11 requires site specific flood risk assessments for certain schemes. The policies contained within the City Plan are likely to mitigate impacts on this objective, however overall the impact is considered to be mixed.				Overall, this option has the greatest potential for significant positive effect on this objective, however impacts are still considered to be mixed due to the existing form of the site. The SPD could be strengthened further by providing examples which have multiple environmental benefits, such as flood mitigation benefitting biodiversity, air quality, water pollution, climate change adaptation, provision of green corridors and so on.
	Impacts from all options are considered to be mixed, due to the existing form of the site. Option 3 is considered to have greater potential for more significant positive impact due to the identification of broad locations where certain types of development may be acceptable and the consideration of flood risk measures at an early stage of a scheme, which will help to adapt to climate change impacts. It would be useful for the SPD to promote features, which support climate change adaptation, that have multiple benefits, particularly as the land available is expected to achieve a lot. For example, how certain flood mitigation techniques could have benefits for biodiversity, air quality, water pollution, climate change adaptation, provide green corridors and so on.					
19. To encourage new developments to meet adopted sustainable building standards.	+	DA7 requires the development to meet the requirements set out in CP8. CP8 requires residential	++	There are different elements which make up a BREEAM rating such as points scored for energy efficiency, water	++	As with Option 2, this option will provide details on different measures that could be integrated into a scheme

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		development to achieve a 19% reduction over Part L (Building Standards) and to meet the water efficiency standard of 110l/p/day. CP8 requires non-residential development on a greenfield site to achieve BREEAM Excellent standard. This will impact positively for this objective.		efficiency and prevention of pollution. This option will include guidance on how different elements of the scheme will support the achievement of sustainable buildings standards, such as how design and layout could help deliver more sustainable buildings; opportunities to reduce car ownership and promote sustainable travel; features which enhance biodiversity and features which tackle pollution from flood risk. The inclusion of examples of measures which could be included within a development is considered to have a significant positive impact on this objective. The SPD could show the link between certain measures and how these measures would support the achievement of certain standards, e.g. BREEAM credits.		that will support the achievement of sustainable building standards. The SPD could show the link between certain measures and how these measures would support the achievement of certain standards, e.g. BREEAM credits to further maximise beneficial impacts.
	Both options 2 and 3 have potential for greater significant positive impact compared to option 1. Both options provide					

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
	opportunities to provide further guidance and detail on measures which could be integrated into a scheme that would support the achievement of sustainable building standards. The SPD could be explicit by showing the link between certain measures and the BREEAM credits that could be gained, to increase the potential for positive impact.					
20. To promote and improve integrated transport links and accessibility to health services, education, jobs and food stores.	+	Transport: One of the priorities of DA7 is to improve sustainable transport links to the area. In addition the policy requires contributions for improvements to links to the SDNP, and the delivery of public realm that encourages cycling and walking. All of these measures should result in improved transport links. Services: In addition, DA7 requires delivery of various supporting uses, such as community facility, doctors and local shops all of which will facilitate access to these services. Phasing: DA7 states the importance of phasing and that supporting and ancillary uses are provided	++	Transport: This option involves identification of improvements required to bus services, cycle links and the pedestrian network, all of which would improve access to services. Services: Services will be provided in accordance with DA7. This option suggests exploring the potential for temporary community/services prior to development in order to build links with existing communities, however it is difficult to know how this will be implemented in practice. Phasing: Further guidance on phasing of essential and supportive infrastructure and supporting uses would have a positive	++	Transport: This option involves identification of key routes and crossing points, traffic calming measures and opportunities for road design all of which would improve transport links to services. Services: Services will be provided in accordance with DA7. This option will identify the broad location for a multi-use community facility with access a key consideration. In addition, it would consider how community facilities/services link with other uses of the scheme in a way that creates a sustainable neighbourhood. This would have positive impacts on access.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
		at the appropriate time, however gives no further detail as to when this is. DA7 also states that some employment land should be completed prior to completion of the housing element. The IDP sets out the types of infrastructure that will be required for the city over the plan period, which includes certain requirements for the THV site, however is not specific about when these should be delivered.		impact on this objective through enabling access to various service/uses for new and existing communities.		Phasing: A masterplan approach would provide clarity in terms of what infrastructure and supporting uses is required and when. This would have a positive impact on this objective through enabling access to various services/uses for new and existing communities.
	Options 2 and 3 are likely to result in more significant positive impacts on this objective than option 1, particularly through the consideration of broad locations for the community facility and through the consideration of how the different elements of the scheme link together to form a sustainable neighbourhood. Greater detailed guidance on phasing, either through a broad brush or masterplan approach has potential to have a greater beneficial impact on this objective when compared to option 1 and would help to support delivery of a sustainable community which can meets its needs locally from the outset.					
21. To reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, business	+	CP8 requires development to minimise waste and facilitate recycling.	0	This option does not refer to measures to reduce waste or increase material efficiency. This is likely to be outside of the scope of the SPD.	0	This option does not refer to measures to reduce waste or increase material efficiency. This is likely to be outside of the scope of the SPD.

Sustainability Objective	City Plan	Summary of Effects	Broad brush	Summary of Effects	Detail	Summary of Effects
and initiatives that promote these and other sustainability issues.						
	Options 2 and 3 do not include any measures relating to reducing waste. Option 1 therefore provides the greatest potential for positive impact against this objective. Although not directly related to reducing waste, the SPD could make the link between using materials and resources efficiently e.g. the types of building design which could have a positive effect on increasing material efficiency, e.g. terraced or flatted types of dwellings.					

Appendix E Draft SPD Appraisal

This assessment mainly considers the guidance set out in Section 6 of the Draft SPD: Appropriate Development Response. This includes the following topics:

- Quantum of development
- Masterplanning and landscape-led design
- Place making
- Housing
- Office
- Education
- Community & retail
- Environment
- Transport & travel
- Public realm & blue-green infrastructure.

A separate appraisal for each of the above topics has been carried out to help show the impacts associated with each. Impacts are defined as positive or negative. In addition, the assessment indicates whether impacts are considered to be direct or indirect, occur in the short (S), medium (M) or long-term (L), and be permanent or temporary[4] on the objective. All of these impacts do not consider whether mitigation or implementation of other parts of the policy could change the impacts, e.g. worst case scenario and pre-mitigation. The following key has been used.

Effect	**Direct/Indirect**	**Permanence**	**Timescales**	
++ strong positive effect	D = direct	P = permanent	Short term	Within 5 years of development
+ positive effect	I = indirect	T = temporary	Medium term	Within 5-10 years of development
0 no/negligible effect			Long term	10+ years of development
- negative effect				
-- strong negative effect				
-/+ mixed effect				

[4] **Effects as required by Schedule 2 (6) of the Assessment of Plans and Programme Regulations 2004**

This initial assessment does not assume that the policy requirements of City Plan Part 1 will be met and these requirements are referred to in more detail in mitigation where relevant. Mitigation in bold will form recommendations for the SPD. A further cumulative assessment has been carried out on the likely outcome of the entire SPD and this considers what the impacts would be in combination with other policy requirements, e.g. of City Plan Part 1.

Quantum of Development

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	-?	-?	-?	The amount of development delivered will result in loss of a greenfield site which performs various ecosystem services, including that of providing habitat and wildlife corridors. However, the current ecological value of the site is unknown. The amount of development delivered will increase the local population, which may increase the risk of recreational pressure on the SNCI. However it is recognised that the SNCI is currently degraded in its current form.	D	T	**An ecological assessment would be required to determine the value of the site prior to any development taking place. This could be referred to in the SPD under paragraph 6.6.** DA7 requires opportunities to maximise biodiversity to be delivered throughout the site and requires the SNCI to be conserved and enhanced. Improvements to the SNCI could increase access to nature for local people, as well as having benefits for biodiversity, and this is referred to in the Public Realm section of the SPD.
2. Air quality	-	-	-	The amount of development delivered will result in an increased local population which could increase the amount of journeys made by car to and from the area. In addition, the amount and types of development could also increase the amount of journeys to/from the area for education and employment purposes. This could have associated impacts on air quality. It is recognised that air quality in this location is generally good and it is not in close proximity to the current AQMA.	I	T	DA7 requires various sustainable transport measures to be delivered to address traffic impacts. The Transport section of the SPD includes guidance on various measures which could help reduce car journeys as well as improve traffic flow. It also includes guidance on how the SDNP buffer could help reduce traffic noise. This may also have benefits for air quality resulting from traffic on the A27.
3. Local distinctiveness and historic environment.		+	+	The amounts of development are not considered to have any heritage impacts due to the site's location. 2.5ha of public realm including open space and food growing space is required to be delivered. This will	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				increase the amount of publically accessible open space in the area. The types of development required to be delivered also includes community facilities, shops and cafes all of which have potential of creating a distinctive neighbourhood.			
4. SDNP	-	-	-	The quantums of development required to be delivered suggest that there will need to be some high density development. This could impact on the setting of the SDNP or views to and from the SDNP. In addition, there could be light pollution resulting on impacts on the SDNP which is now a designated Dark Skies Reserve.	D	P	An LVIA would be required to analyse the impacts of any proposed development on the SDNP. This is referred to in Section 6 of the SPD. DA7 requires the development to respect the setting of the SDNP and should consider the impact of development on the purpose of the SDNP. The Master-planning section of the SPD requires the design of the development to consider visual impact and strategic views and includes a range of guidance on how and where higher density building should be located which would help reduce visual impacts on the SDNP. The Public Realm section also suggests that a SDNP buffer should be considered. **Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.**
5. Housing	+	+	++	At least 700 residential units are required to be delivered and this will have positive effects on this objective. Residential development will include a proportion of affordable housing. In addition, this section of the SPD refers to the need to provide 50% family dwellings.	D	P	
6. To reduce car journeys and encourage more	--	--	--	The amount of development delivered will result in an increased local population which could increase the amount of journeys made by car to and from the area and increase local car ownership. In addition, the amount and types of non-residential development could also increase	D	T	DA7 requires various sustainable transport measures to be delivered which may reduce journeys made by car to and from the area. The Transport section of the SPD includes guidance on various measures which could help

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
sustainable modes of transport.				the amount of journeys to/from the area for education and employment purposes.			reduce car journeys.
7. Minimise pollution to water	-	-	-	The site is located within Groundwater Source Protection Zone 2. The SFRA shows the western edge of the site to be at risk of deeper water flooding. The amount of development to be delivered will result in the loss of a greenfield site which has a role in water absorption and will result in an increase in urbanised non-permeable surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere.	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk.
8. Minimise water use	-	-	-	The amount of development delivered will result in an increased population and will increase the demand for water.	I	P	DA7 requires the development to be an exemplar sustainable development and to meet other City Plan policy requirements including delivering residential development that meets the 100l/p/day standard. **The SPD does not include any reference to opportunities that may help reduce water demand, e.g. through harvesting rainwater which would further reduce the ecological footprint of development.**
9. To promote the sustainable development of land affected by contamination.	?	?	?	It is unknown whether the site has any potential for contamination and therefore whether development would have any impacts on this objective			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were found on site.
10. Employment creation	++	++	++	Delivery of a 3.4-4.5ha site for office use would have positive impacts on this objective. In addition, the amount of other development to be delivered will also have positive impacts resulting from construction related jobs.	D	T/P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
11. Economic development	++	++	++	Delivery of a 3.4-4.5ha site for office use would have positive impacts on this objective. In addition, the amount of other development to be delivered will also have positive impacts for economic development resulting from construction related jobs.	D	T/P	
12. To improve the health and reduce health inequalities	+	+	+	The development will deliver many of the social determinants of health including housing as well as opportunities for education and employment and opportunities that may facilitate healthy lifestyles such as open space.	I	P	
13. To integrate health and community safety	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
14. To narrow the gap between the most deprived areas and the rest of the city	+	+	+	The delivery of various types of development could help reduce deprivation through increased availability of training opportunities, jobs and housing, particularly affordable housing.	I	T	
15. To engage local communities into the planning process	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			It is noted that the section of the SPD entitled “Submitting a Planning Application” recommends that community consultation take place prior to submitting a planning application.
16. To make the best use of land available	++	++	++	The site is required to deliver large amounts of various types of development. This will require ensuring that the best use of the site is made in order to deliver the various requirements.	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
17. To maximise sustainable energy use	-	-	-	The amount of development delivered will result in an increased population and will increase the demand for energy.	I	P	Policy DA7 requires an exemplary sustainable development to be delivered and development will be required to meet other City Plan policy requirements including CP8 Sustainable Buildings. This should help reduce consumption of energy. The Environment section of the SPD provides more guidance on the opportunities that could be incorporated to help reduce demand for energy.
18. To take into account the changing climate	-	-	-	Development of the THV will result in urbanisation of a greenfield site. This type of site provides various ecosystem services such as absorption of water, maintaining temperatures and reducing the urban heat island effect, all of which will become more important in helping adaptation towards climate change. The amount of development required in this location will result in increased massing which could also exacerbate the urban heat island effect and will also reduce the sites ability to absorb water, which could result in greater flood risk and impact on the ability to adapt to climate change.	D	P	DA7 requires development to not lead to an increase in risk of surface water flooding. CP8 also has various requirements which will mitigate these impacts. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk and manage water, and also on providing opportunities for biodiversity which will both help to manage water and help with temperature regulation and therefore climate change adaptation.
19. To encourage new developments to meet adopted sustainable building standards.	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			Adopted policy DA7 and CP8 will ensure implementation of adopted sustainable building standards for the various types of development.
20. Integrated transport links and	+	+	+	The different types of development to be delivered include a community facility, shops, cafes, a school, employment opportunities and open space. Provision of	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
accessibility to services.				these will help to increase access to these services, for both the new community living in the THV area and also for adjacent communities.			
21. To reduce waste generation and increase material efficiency	-	-	-	The amount of development to be delivered will result in an increase of waste during both construction and operation stage. However it is recognised that the development will involve some higher density development which is generally more resource efficient than lower density development.	I	T	Construction stage waste will be required to be managed in accordance with the Waste & Minerals Local Plan policies. Policy CP8 should ensure that waste is minimised at operation stage. The Environment section of the SPD refers to ensuring high standards of construction, including waste management, and refers to choosing building materials based on their performance and low maintenance over time, both of which would have positive impacts for the reduction in waste. The Housing section of the SPD refers to opportunities that adopt efficient construction techniques.

Masterplanning and landscape-led design

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	+?	+?	+?	This section of the SPD suggests that higher density taller buildings should be located at the flat-bottomed valley floor at the western end of the site. This borders the SNCI and may result in some impacts on the SNCI in this location, resulting in the uncertain impact. This section of the SPD suggests that the land use relationships would support having a network of open spaces which includes the SNCI and opportunities for nature conservation which would impact positively on this objective.	I	P	The impacts of higher density building in close proximity to the SNCI would need to be assessed and this is already recognised and referred to in the SPD.
2. Air quality	+	+	+	This section of the SPD refers to need for the siting, massing and form of buildings to seek to minimise exposure to air pollution for residents and therefore although does not minimise the causes of air pollution it could have positive impacts for this objective by minimising exposure to existing pollutants. The SPD does not provide any guidance or examples for how this might be delivered.	D	P	**Could the SPD provide some examples of design features which could help to minimise exposure to air pollution?**
3. Local distinctiveness and historic environment.	++	++	++	This section of the SPD should help to result in the development of a distinctive new neighbourhood. The SPD indicates how different uses could be clustered in order to provide a vibrant mixed use neighbourhood centre which would impact positively on this objective. This includes uses such as children's play, community and retail and higher density housing in the centre, with the school, office and lower density housing on the periphery.	D	P	
4. SDNP	++	++	++	This section should help protect the landscape character and is considered to have significant positive	D	P	An LVIA would be required to analyse the impacts of any proposed development on the

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				effects on this objective. The SPD recognises that the setting of the SDNP presents a challenge for development. However, this section of the SPD sets out the strategic views that would need to be considered in a LVIA, suggests that suitable locations for higher density taller buildings would flat-bottomed valley floor at the western end of the site, to help minimise visual impacts on the SDNP and suggests that development should maximise views and should be appropriate within the wider landscape.			SDNP. This is referred to in Section 6 of the SPD.
5. Housing	++	++	++	This section of the SPD supports increasing the availability of housing. It encourages applicants to optimise provision of housing and refers to the importance of ensuring housing densities can support a viable new neighbourhood. This section also refers to higher density taller buildings being suitable in certain locations.	D	P	
6. To reduce car journeys and encourage more sustainable modes of transport.	+	+	+	This section of the SPD has some references which may help to reduce car journeys, for instance it references the need to generate a “critical mass” to help ensure that bus services are economically viable. The clustering of certain uses may encourage more active travel throughout the neighbourhood and the location of uses such as the school on the periphery should help facilitate access. The risk that the development will result in additional journeys by car is still high however this is looked at in other parts of the SA.	I	T	
7. Minimise pollution to water	-	-	-	This section of the SPD suggests that higher density development would be most suitably located towards western end of the site. This is within the area most	D	T	DA7 requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				susceptible to flood risk and may result in an increase in flood risk elsewhere.			the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk.
8. Minimise water use	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD. The risk that development will result in an increase in water consumption is looked at in other parts of the SA.			
9. To promote the sustainable development of land affected by contamination.	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
10. Employment creation	+	+	+	This section of the SPD should support creation of employment opportunities. It suggests that the periphery of the site would be suitable for office uses, and that community/retail would be more suitable clustered together in a neighbourhood centre. The SPD also refers to ensuring the development creates the critical mass required to create an economically viable neighbourhood.	D	P	
11. Economic development	+	+	+	This section of the SPD should support creation of employment opportunities. It suggests that the periphery of the site would be suitable for office uses, and that community/retail would be more suitable clustered together in a neighbourhood centre. The SPD also refers to ensuring the development creates the critical mass required to create an economically viable neighbourhood.	D	P	
12. To	+	+	+	This section of the SPD could have some health	I	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
improve the health and reduce health inequalities				benefits, for instance through the clustering of certain uses which may facilitate sustainable and active travel throughout the site. It also refers to siting buildings to help minimise exposure to air pollution which would also have health benefits.			
13. To integrate health and community safety	-/+	-/+	-/+	The creation of a neighbourhood centre, where there are a cluster of land uses could help increase passive surveillance and facilitate community safety. However, the delivery of a school which will attract pupils from outside the area would need to be carefully managed to ensure that road safety of pupils was not compromised on journeys to school.	I	P	**Could the section on Education include a reference to ensuring future road safety? E.g. 6.33 …with improved links from the south and west <u>that maximise road safety for pupils</u>…**
14. To narrow the gap between the most deprived areas and the rest of the city	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
15. To engage local communities into the planning process	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
16. To make the best use of land available	++	++	++	This section of the SPD refers to the various uses that are required to be delivered on site. It refers to delivering higher density taller buildings in certain locations of the site which would help to maximise efficient use of the site. It also refers to opportunities to combine features, e.g. such as open space incorporating opportunities for play and food growing,	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				which would also help to ensure efficient use of the site.			
17. To maximise sustainable energy use	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD. The risk that development will result in an increase in energy consumption is looked at in other parts of the SA.			
18. To take into account the changing climate	-	-	-	This section of the SPD suggests that higher density development would be most suitably located towards western end of the site. This is within the area most susceptible to flood risk and may result in an increase in flood risk elsewhere particularly in heavier rainfall events which may increase as a result of climate change. The amount of development required in this location will result in increased massing which could also exacerbate the urban heat island effect.	D	T	DA7 requires development to not lead to an increase in risk of surface water flooding. CP8 also has various requirements which will mitigate these impacts. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk and manage water, and also on providing opportunities for biodiversity which will both help to manage water and help with temperature regulation and therefore climate change adaptation.
19. To encourage new developments to meet adopted sustainable building standards.	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
20. Integrated transport links and accessibility to	++	++	++	This section of the SPD refers to the various uses that are required to be delivered on site including community, retail, school, office as well as open space and opportunities for play. The availability and	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
services.				provision of these services will help improve access for both the new and existing neighbouring communities. This section of the SPD also refers to the creation of a network of paths and roads that connects uses within the site which should also help facilitate access. The clustering of uses may also help to facilitate more sustainable and active travel.			
21. To reduce waste generation and increase material efficiency	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			

Place-making

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
2. Air quality	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
3. Local distinctiveness and historic environment.	++	++	++	This section of the SPD would have significant positive effects on this objective. The focus of this section is ensuring creation of an identifiable neighbourhood centre and would help create and strengthen local character. The SPD suggests clustering certain uses within the neighbourhood centre, as well as making it the public transport hub from which a network of routes and spaces lead across the remainder of the site. These measures would help to create a locally distinctive neighbourhood centre.	D	P	
4. SDNP	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
5. Housing	+	+	+	This section of the SPD promotes the location of higher density housing within the neighbourhood centre to help form a focal point.	D	P	
6. To reduce car journeys and encourage more sustainable modes of transport.	+	+	+	This section of the SPD encourages the creation of a neighbourhood centre where various land uses are concentrated. This in itself would help to reduce car journeys e.g. that may otherwise be generated if having to travel to a variety of different locations to meet various needs. This section of the SPD also suggests focusing the principal public transport pick-up point in the neighbourhood centre, which would help to facilitate sustainable transport use and is likely to encourage sustainable travel more than if a bus route	D	P	

				only passed the outside of the site. This section of the SPD also suggests the neighbourhood centre being the focal point within a wider network of pathways and roads. A well connected neighbourhood would support achieving this objective.			
7. Minimise pollution to water	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
8. Minimise water use	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
9. To promote the sustainable development of land affected by contamination.	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
10. Employment creation	+	+	+	Although not of direct relevance, this section of the SPD promotes the creation of a neighbourhood centre which includes various uses including those that generate employment. Having employment uses within the neighbourhood centre (commercial as well as retail) will help to increase footfall, viability and vitality of the neighbourhood centre, as would bring different people into the area at different times.	I	P	
11. Economic development	+	+	+	Although not of direct relevance, this section of the SPD promotes the creation of a neighbourhood centre which includes various uses including those that generate employment. Having employment uses within the neighbourhood centre (commercial as well as retail) will help to increase footfall, viability and vitality of the neighbourhood centre, as would bring different people into the area at different times.	I	P	

12. To improve health and reduce health inequalities	++	++	++	This section of the SPD should help to encourage and facilitate active travel through the clustering of uses to create a neighbourhood centre which is well linked into the wider development through routes and pathways. The neighbourhood centre would also be the location for health facilities, supporting access to health for the new and existing neighbouring communities. The SPD also refers to the need for the neighbourhood centre to be socially inclusive which could help towards meeting the needs of people with protected characteristics. The creation of a vibrant and active neighbourhood centre will be essential in helping to develop a sustainable and cohesive community.	D	P	
13. To integrate health and community safety	+	+	+	The creation of a neighbourhood centre, where there are a cluster of varying land uses, could help increase passive surveillance and facilitate community safety.	D	P	
14. To narrow the gap between the most deprived areas and the rest of the city	+	+	+	This section of the SPD could help to reduce employment and education based deprivation through increasing opportunities for employment and training, and could help reduce health based deprivation through improving access to open space and increasing opportunities for active lifestyles.	I	P	
15. To engage local communities into the planning process	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
16. To make the best use of land	+	+	+	This clustering of uses to create a defined neighbourhood centre may help to maximise more efficient use of the site.	D	P	

available							
17. To maximise sustainable energy use	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
18. To take into account the changing climate	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
19. To encourage new developments to meet adopted sustainable building standards.	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
20. Integrated transport links and accessibility to services.	+	+	+	This section of the SPD encourages the creation of a neighbourhood centre where various land uses are concentrated. This in itself would help to improve access to services and may help to reduce car journeys e.g. that may otherwise be generated if having to travel to a variety of different locations to meet various needs. This section of the SPD also suggests focusing the principal public transport pick-up point in the neighbourhood centre, which would help to facilitate sustainable transport use and is likely to encourage sustainable travel more than if a bus route only passed the outside of the site. This section of the SPD also suggests the neighbourhood centre being the focal point within a wider network of pathways and roads. A well connected neighbourhood would support	D	P	

				achieving this objective.			
21. To reduce waste generation and increase material efficiency	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			

Housing

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	-	-	-	This section of the SPD states that a minimum of 700 residential units should be brought forward although suggests that numbers can exceed this minimum. This amount of development will result in loss of a greenfield site which performs various ecosystem services, including that of providing habitat and wildlife corridors. The current ecological value of the site is unknown. The amount of development delivered will increase the local population, which may in turn increase the risk of recreational pressure on the SNCI. However it is recognised that the SNCI is currently degraded in its current form.	D	T	**An ecological assessment would be required to determine the value of the site prior to any development taking place. Although this is likely to form part of an EIA, this could be specifically referred to in the SPD under paragraph 6.6.** DA7 requires opportunities to maximise biodiversity to be delivered throughout the site and requires the SNCI to be conserved and enhanced. Improvements to the SNCI could increase access to nature for local people, as well as having benefits for biodiversity, and this is referred to in the Public Realm section of the SPD. CP8 Sustainable Buildings and the Environment section of the SPD refers to various measures that can be included in the design of that would be beneficial for biodiversity.
2. Air quality	-	-	-	Air quality in this location is generally good and the site is not in close proximity to the AQMA. The amount of development delivered will result in an increased local population which could increase the amount of journeys made by car to and from the area. In addition, the amount and types of development could also increase the amount of journeys to/from the area for education and employment purposes. This could have associated impacts on air quality. It is recognised that air quality in this location is generally good and it is	I	T	DA7 requires various sustainable transport measures to be delivered to address traffic impacts. The Transport section of the SPD includes guidance on various measures which could help reduce car journeys as well as improve traffic flow. It also includes guidance on how the SDNP buffer could help reduce traffic noise. This may also have benefits for air quality resulting from traffic on the A27.

				not in close proximity to the current AQMA.			
3. Local distinctiveness and historic environment.		+	+	The amounts of development are not considered to have any heritage impacts due to the site's location. The indicative density across the site is between 50-75dph. Although this is lower than other development areas, this is higher than adjacent areas which vary from 10-30dph. The development is therefore likely to be very different in appearance from adjacent communities and this will help to create a distinctive neighbourhood. Delivery of more than 700 residential dwellings would result in the loss of a greenfield site, however as the site is privately owned and not publically accessible, development has potential to increase open space provision provided it is delivered on site.	D	P	
4. SDNP	-	-	-	The amount of residential development required to be delivered suggest that there will need to be some higher density development, with indicative densities ranging between 50-75dph. This could impact on the setting of the SDNP or views to and from the SDNP. In addition, there could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve.	D	P	An LVIA would be required to analyse the impacts of any proposed development on the SDNP. This is referred to in Section 6 of the SPD. DA7 requires the development to respect the setting of the SDNP and should consider the impact of development on the purpose of the SDNP. The Master-planning section of the SPD requires the design of the development to consider visual impact and strategic views and includes a range of guidance on how and where higher density building should be located which would help reduce visual impacts on the SDNP. The Public Realm section also suggests that a SDNP buffer should be considered. **Guidance on opportunities to**

							reduce/minimise light pollution could be referred to in SPD.
5. Housing	++	++	++	This section sets out that a minimum of 700 dwellings are to be delivered. It sets out the densities to be achieved which indicates some higher density buildings will be delivered, and that housing mix will need to be delivered in accordance with CP19 Housing Mix. The SPD suggests that housing design should include a variety of types to meet various needs including for older people, disabled people and non-family households. The SPD also suggests that provision of affordable housing should be optimised. This section of the SPD is considered to have significant positive impacts on this objective as would increase the availability of a wide range of housing, addressing the needs of a variety of people.	D	P	
6. To reduce car journeys and encourage more sustainable modes of transport.	--	--	--	The amount of residential development delivered will result in an increased local population. This could increase the amount of journeys made by car to and from the area and increase local car ownership.	D	T	DA7 requires various sustainable transport measures to be delivered which may reduce journeys made by car to and from the area. The Transport section of the SPD includes guidance on various measures which could help reduce car journeys.
7. Minimise pollution to water	-	-	-	The site is located within Groundwater Source Protection Zone 2. The SFRA shows the western edge of the site to be at risk of deeper water flooding. The amount of development to be delivered will result in the loss of a greenfield site which has a role in water absorption and will result in an increase in urbanised non-permeable surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere.	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk.

8. Minimise water use	-/+	-/+	-/+	The amount of development delivered will result in an increased population and will increase the demand for water. However this section of the SPD specifies that development should achieve high standards of sustainable building design which should include helping to minimise water use.	I	P	DA7 requires the development to be an exemplar sustainable development and to meet other City Plan policy requirements including delivering residential development that meets the 100l/p/day standard as set out in CP8.
9. To promote the sustainable development of land affected by contamination.	?	?	?	It is unknown whether the site has any potential for contamination and therefore whether residential development would have any impacts on this objective.			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were found on site.
10. Employment creation	+	+	+	The amount of residential development to be delivered will have positive impacts on this objective due to the construction related jobs generated. In addition, the new service sector jobs will be created in order to meet the needs of the new community.	D	T/P	
11. Economic development	+	+	+	The amount of residential development to be delivered will have positive impacts on this objective due to the construction related jobs generated. In addition, the new service sector jobs will be created in order to meet the needs of the new community.	D	T/P	
12. To improve health and reduce health inequalities	+	+	+	Access to housing is one of the wider determinants of health and can help reduce health inequalities. This section of the SPD suggests that provision of affordable units should be optimised which could help address access to housing and would contribute towards meeting city-wide housing needs.	I	P	
13. To integrate health and	+	+	+	This section of the SPD refers to creating a neighbourhood centre which includes a range of different types of housing, including housing over retail	I	P	

community safety				units. This design would help increase passive surveillance and can help to improve community safety.			
14. To narrow the gap between the most deprived areas and the rest of the city	+	+	+	This section of the SPD could help to reduce deprivation through increasing access and availability of affordable housing.	I	P	
15. To engage local communities into the planning process	0	0	0	There are no direct or indirect impacts on this objective resulting from this section of the SPD.			
16. To make the best use of land available	++	++	++	This section of the SPD sets out that a minimum of 700 dwellings should be provided achieving densities of between 50-75 dwellings. Delivery of this amount of development, in addition to all the other amounts of development, will ensure the most efficient use of the site is made.			
17. To maximise sustainable energy use	-/+	-/+	-/+	The amount of development delivered will result in an increased population and will increase the demand for energy. However this section of the SPD specifies that development should achieve high standards of sustainable building design which should include helping to minimise energy use.	I	P	Policy DA7 requires an exemplary sustainable development to be delivered and development will be required to meet other City Plan policy requirements including CP8 Sustainable Buildings. This should help reduce consumption of energy. The Environment section of the SPD provides more guidance on the opportunities that could be incorporated to help reduce demand for energy.
18. To take into account	-	-	-	Development of the THV will result in urbanisation of a greenfield site. This type of site provides various	D	P	DA7 requires development to not lead to an increase in risk of surface water flooding.

the changing climate				ecosystem services such as absorption of water, maintaining temperatures and reducing the urban heat island effect, all of which will become more important in helping adaptation towards climate change. The amount of development required in this location will result in increased massing which could also exacerbate the urban heat island effect and will also reduce the sites ability to absorb water, which could result in greater flood risk and impact on the ability to adapt to climate change.			CP8 also has various requirements which will mitigate these impacts. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk and manage water, and also on providing opportunities for biodiversity which will both help to manage water and help with temperature regulation and therefore climate change adaptation.
19. To encourage new developments to meet adopted sustainable building standards.	+	+	+	This section of the SPD suggests that housing design should achieve high standards of sustainable building design which should impact positively on this objective	D	P	Adopted standards required to be achieved are those set out in policy CP8 Sustainable Buildings.
20. Integrated transport links and accessibility to services.	0	0	0	There is no direct link between this section of the SPD and this objective.			
21. To reduce waste generation and increase material efficiency	-	-	-	The amount of residential development to be delivered will result in an increase of waste during both construction and operation stage. However it is recognised that the development will involve some higher density development which is generally more resource efficient than lower density development. It is acknowledged that this section of the SPD refers to opportunities that adopt efficient construction techniques.	I	T	Construction stage waste will be required to be managed in accordance with the Waste & Minerals Local Plan policies. Policy CP8 should ensure that waste is minimised at operation stage. The Environment section of the SPD refers to ensuring high standards of construction, including waste management, and refers to choosing building materials based on their

							performance and low maintenance over time, both of which would have positive impacts for the reduction in waste.

Office

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	0	0	0	The delivery of a 3.5-4.5ha site area for future employment space is considered to have negligible effects on biodiversity, although will depend in the ecological value of the existing habitat.			Development likely to provide opportunities to provide net gains in biodiversity.
2. Air quality	-	-	-	Air quality in this location is generally good and the site is not in close proximity to the AQMA. However, employment uses on the site are likely to result in an increase in journeys made to the area for employment purposes. It is likely that a proportion of these will be made by car particularly given the site's location with good road access to the strategic road network and this could have localised air quality impacts. This section of the SPD suggests that the northern boundary or the boundary along King George VI Avenue would be good locations for employment uses to facilitate access to the A27, and although this would minimise employment based journeys within the site, it would concentrate them more in these locations.	I	T	DA7 requires various sustainable transport measures to be delivered which may reduce journeys made by car to and from the area. The Transport and Travel section of the SPD recognises the potential for transport issues. This section sets out measures which would help mitigate some transport issues such as ensuring the creation of a neighbourhood that can support a viable bus service, creating a legible, accessible neighbourhood to help promote walking and cycling, and to reduce traffic speed to help improve road safety in the vicinity. These measures would have associated benefits for air quality. The SPD also suggests a detailed travel plan and transport assessment would help to identify suitable mitigation measures.
3. Local distinctiveness and historic	+	+	+	This section of the SPD suggests locations for where the employment uses may be best placed, which is mainly around the borders of the site. The SPD also	I	P	

environment.				suggests including some employment uses could be located within the neighbourhood centre in order to add to its vitality and success. This would help to create and strengthen local character.			
4. SDNP	?	?	?	It is unknown what density or height the office based development would need to be in order to accommodate 25,000sqm and whether or not the employment based development itself would have impacts upon the SDNP. The employment based development is considered unlikely to have significant effects by itself, given the other amounts of development to be delivered. This section of the SPD refers to minimising visual impacts and utilising the natural landform by placing employment-based car parking needs underneath buildings, which may help to reduce visual impacts from the SDNP.	D	P	An LVIA would be required to analyse the impacts of any proposed development on the SDNP. This is referred to in Section 6 of the SPD. DA7 requires the development to respect the setting of the SDNP and should consider the impact of development on the purpose of the SDNP. The Master-planning section of the SPD requires the design of the development to consider visual impact and strategic views and includes a range of guidance on how and where higher density building should be located which would help reduce visual impacts on the SDNP. This may include employment based development. The Public Realm section also suggests that a SDNP buffer should be considered. **Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.**
5. Housing	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
6. To reduce car journeys and encourage more sustainable	-	-	-	Employment uses on the site are likely to result in an increase in journeys made to the area for employment purposes, particular at the rush-hour peak. It is likely that a proportion of these will be made by car particularly given the site's location with good road access to the strategic road network. This section of	I	T	DA7 requires various sustainable transport measures to be delivered which may reduce journeys made by car to and from the area. The Transport and Travel section of the SPD recognises the potential for transport issues. This section sets out measures which would

modes of transport.				the SPD suggests that the northern boundary or the boundary along King George VI Avenue would be good locations for employment uses to facilitate access to the A27, and although this would minimise employment based journeys within the site, it would concentrate them more in these locations. However the location of employment uses on the borders of the site could have some positive effects in terms of helping to provide a barrier for traffic noise from travelling from adjacent roads into the more sensitive uses located within the site.			help mitigate some transport issues such as ensuring the creation of a neighbourhood that can support a viable bus service, creating a legible, accessible neighbourhood to help promote walking and cycling, and to reduce traffic speed to help improve road safety in the vicinity. These measures would have associated benefits for air quality. The SPD also suggests a detailed travel plan and transport assessment would help to identify suitable mitigation measures. Impacts on the existing road network would need to be assessed as part of any scheme.
7. Minimise pollution to water	-	-	-	The site is located within Groundwater Source Protection Zone 2. The SFRA shows the western edge of the site to be at risk of deeper water flooding. Any development on the site will result in the loss of a greenfield site which has a role in water absorption and will result in an increase in urbanised non-permeable surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere.	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk.
8. Minimise water use	-	-	-	Employment based development will result in an increased demand for water.	I	P	DA7 requires the development to be an exemplar sustainable development and will be required to meet other City Plan policy requirements including all major non-residential development on greenfield sites to achieve BREEAM Excellent standard. This will include incorporating measures to reduce water consumption.
9. To promote the sustainable	?	?	?	It is unknown whether the site has any potential for contamination and therefore whether employment based development would have any impacts on this			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were

development of land affected by contamination.				objective.			found on site.
10. Employment creation	++	++	++	Delivery of a site for employment uses, with potential to deliver 25,000 B1 office space would have significant positive benefits in terms of employment opportunities. This section of the SPD suggests that employment uses could be positioned along the boundary of the site to help facilitate access and also suggests that some employment uses could be included as part of the mix of uses in the neighbourhood centre. The section sets out that employment development should cater for a variety of business types including small and large. This is considered to provide employment opportunities in a range of sectors.	D	P	
11. Economic development	++	++	++	Delivery of a site for employment uses, with potential to deliver 25,000 B1 office space would have significant positive benefits in terms of employment opportunities. This section of the SPD suggests that employment uses could be positioned along the boundary of the site to help facilitate access and also suggests that some employment uses could be included as part of the mix of uses in the neighbourhood centre. The section sets out that employment development should cater for a variety of business types including small and large. This is considered to provide employment opportunities in a range of sectors.	D	P	
12. To improve health and	+	+	+	Access to meaningful employment is one of the wider determinants of health. This section of the SPD would therefore have positive impacts on this objective	I	P	

reduce health inequalities							
13. To integrate health and community safety	+	+	+	This section of the SPD refers to considering the inclusion of some employment uses within the neighbourhood centre. This would help to support community safety by providing opportunities for passive surveillance in this location.	I	P	
14. To narrow the gap between the most deprived areas and the rest of the city	+?	+?	+?	The delivery of employment-based development would increase access to employment and training opportunities. This could help tackle employment based deprivation, which is high in the one of the adjacent neighbourhoods, although this would be dependent on the take-up of opportunities.	I	T	One of the priorities for DA7 is to provide training and job opportunities for local people and the developer is required to enter into a training agreement for local people.
15. To engage local communities into the planning process	0	0	0	There are no direct impacts on this objective resulting from this section of the SPD.			
16. To make the best use of land available	+	+	+	This section refers to measures that would help make the most efficient use of the land available including locating employment uses on the periphery of the site and considering having some car-parking beneath ground level. The suggestions for the type of construction to be used, e.g. a module based gridded construction that allows for flexible use of interior space, would also help to make the best use of the space available and be flexible for future changes.	I	P	
17. To maximise sustainable energy use	-/+	-/+	-/+	The amount of development delivered will result in an increased demand for energy. However this section of the SPD suggests that development should be energy efficient, should be designed to maximise natural light and ventilation and should use materials and	I	P	Policy DA7 requires an exemplary sustainable development to be delivered and development will be required to meet other City Plan policy requirements including CP8 Sustainable Buildings which would require

				resources that have low embodied energy.			BREEAM Excellent to be achieved for non-residential major development on a greenfield site. This should help reduce consumption of energy. The Environment section of the SPD provides more guidance on the opportunities that could be incorporated to help reduce demand for energy.
18. To take into account the changing climate	-	-	-	Development of the THV will result in urbanisation of a greenfield site. This type of site provides various ecosystem services such as absorption of water, maintaining temperatures and reducing the urban heat island effect, all of which will become more important in helping adaptation towards climate change. The amount of development required in this location will result in increased massing which could also exacerbate the urban heat island effect and will also reduce the sites ability to absorb water, which could result in greater flood risk and impact on the ability to adapt to climate change.	D	P	DA7 requires development to not lead to an increase in risk of surface water flooding. CP8 also has various requirements which will mitigate these impacts. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk and manage water, and also on providing opportunities for biodiversity which will both help to manage water and help with temperature regulation and therefore climate change adaptation.
19. To encourage new developments to meet adopted sustainable building standards.	+	+	+	This section of the SPD makes some suggestions for employment development to consider which include energy efficiency, environmental design and sustainable resource use. These measures would support the achievement of high standards of sustainable building design.	D	P	Adopted standards required to be achieved are those set out in policy CP8 Sustainable Buildings which require non-residential major development on greenfield sites to achieve BREEAM excellent.
20. Integrated transport links and accessibility to	+	+	+	Delivery of employment space on site would help facilitate access to employment opportunities in this area, which is generally an area of the city with limited opportunities for local employment. The location of the	D	P	

services.				employment uses on the periphery of the site would assist in access employment from outside the area.			
21. To reduce waste generation and increase material efficiency	+	+	+	This section of the SPD refers to construction method opportunities which may help reduce waste and increase material efficiency such as off-site manufacturing.	I	T	

Education

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	0	0	0	The delivery of a 5ha site area for a future school is considered to have negligible effects on biodiversity, although will depend in the ecological value of the existing habitat.			Development could provide opportunities to provide net gains in biodiversity.
2. Air quality	-	-	-	Delivery of a six-form entry secondary school would equate to approximately 1,300 pupils once at full capacity, in addition to staff. It is likely to take some pupils from within the site itself as well as those from the wider Hove and possibly Brighton areas. This would result in an increase in journeys to the area with potential for associated impacts on air quality.	I	T	DA7 requires various sustainable transport measures to be delivered which may reduce journeys made by car to and from the area. The Transport and Travel section of the SPD recognises the potential for transport issues. This section sets out measures which would help mitigate some transport issues such as ensuring the creation of a neighbourhood that can support a viable bus service, creating a legible, accessible neighbourhood to help promote walking and cycling, and to reduce traffic speed to help improve road safety in the vicinity. These measures would have associated benefits for air quality. The SPD also suggests a detailed travel plan and transport assessment would help to identify suitable mitigation measures. A school would be required to have a School Travel Plan to help promote sustainable travel.
3. Local distinctiveness and historic environment.	+	+	+	The delivery of a school on site has potential to help form a focal centre area for the new community, strengthening local character.	I	P	
4. SDNP	?	?	?	It is unknown what heights the school buildings would need to be and whether or not the school would have	D	P	An LVIA would be required to analyse the impacts of any proposed development on the

				impacts upon the SDNP. The school development is considered unlikely to have significant effects by itself, given the other amounts of development to be delivered.			SDNP. This is referred to in Section 6 of the SPD. DA7 requires the development to respect the setting of the SDNP and should consider the impact of development on the purpose of the SDNP. The Master-planning section of the SPD requires the design of the development to consider visual impact and strategic views and includes a range of guidance on how and where higher density building should be located which would help reduce visual impacts on the SDNP. This may include the school development. The Public Realm section also suggests that a SDNP buffer should be considered. **Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD, e.g. particularly that resulting from floodlighting of sports pitches/school grounds.**
5. Housing	0	0	0	There are no impacts on this objective.			
6. To reduce car journeys and encourage more sustainable modes of transport.	-	-	-	Delivery of a six-form entry secondary school would equate to approximately 1,300 pupils once at full capacity, in addition to staff. It is likely to take some pupils from within the site itself as well as those from the wider Hove and possibly Brighton areas. This would result in an increase in journeys to the area.	I	T	DA7 requires various sustainable transport measures to be delivered which may reduce journeys made by car to and from the area. The Transport and Travel section of the SPD recognises the potential for transport issues. This section sets out measures which would help mitigate some transport issues such as ensuring the creation of a neighbourhood that can support a viable bus service, creating a legible, accessible neighbourhood to help promote walking and cycling, and to reduce

							traffic speed to help improve road safety in the vicinity. Improvements to road safety would be required to ensure safety of pupils travelling to school. The SPD also suggests a detailed travel plan and transport assessment would help to identify suitable mitigation measures. A school would be required to have a School Travel Plan to help promote sustainable travel.
7. Minimise pollution to water	-/+	-/+	-/+	The site is located within Groundwater Source Protection Zone 2. The SFRA shows the western edge of the site to be at risk of deeper water flooding. Any development on the site will result in the loss of a greenfield site which has a role in water absorption and will result in an increase in urbanised non-permeable surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere. However the school may also provide opportunities for natural absorption of water, e.g. on playing fields if incorporated into the development.	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk.
8. Minimise water use	-	-	-	A school providing for 1,300 pupils will result in an increased demand for water.	I	P	DA7 requires the development to be an exemplar sustainable development and will be required to meet other City Plan policy requirements including CP8 which requires non-residential major development on greenfield sites to achieve BREEAM excellent. This will include incorporating measures to reduce water consumption.
9. To promote the sustainable development	?	?	?	It is unknown whether the site has any potential for contamination and therefore whether school based development would have any impacts on this objective.			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were found on site.

of land affected by contamination.							
10. Employment creation	+	+	+	A school will employ a considerable number of staff and have positive impacts on this objective through employment creation.	D	P	
11. Economic development	+	+	+	A school will employ a considerable number of staff and have positive impacts on this objective through employment creation.	D	P	
12. To improve the health and reduce health inequalities	+	+	+	Access to education, training and employment will be provided by a school, all of which help with reducing health inequalities. In addition, should school facilities be opened up to wider community use, this could support lifelong learning and opportunities for sports and leisure.	I	P	
13. To integrate health and community safety	+?	+?	+?	This section of the SPD specifies that the school should be accessible from both the new development on this site and to the wider adjacent residential areas, and should also link to the SNCI, SDNP and the A27. Good safe and accessible links can help improve road safety, however there is some uncertainty regarding road safety of pupils traveling to school due to the fast-slowing nature of the existing adjacent road (King George VI Avenue).	I	P	Road safety of pupils will be critical in ensuring sustainable travel to the school. The Transport and Travel section of the SPD suggests a range of measures which could help to improve road safety, such as measures to reduce traffic speed, safe crossing points, and an accessible well designed network of paths and roads. **Could the section on Education include a reference to ensuring future road safety? E.g. 6.33 …with improved links from the south and west <u>that maximise road safety for pupils</u>…**
14. To narrow the gap between the most deprived areas and the	+?	+?	+?	The development of a school on the site could help reduce deprivation through improving access to education, training and lifelong learning. However this would be based on take up by adjacent deprived communities.	I	T	

rest of the city							
15. To engage local communities into the planning process	0	0	0	There are no direct or indirect links to this objective.			
16. To make the best use of land available	+	+	+	The need for school places will increase as the population grows in the future. Incorporating a new school on this site presents an opportunity that is unlikely to be available elsewhere in the city due to limited land availability. This is considered to have a positive impact on this objective.	I	P	
17. To maximise sustainable energy use	-	-	-	The development of a school will result in an increased demand for energy.	I	P	Policy DA7 requires an exemplary sustainable development to be delivered and development will be required to meet other City Plan policy requirements including CP8 Sustainable Buildings which requires non-residential major development on greenfield sites to achieve BREEAM excellent. This should help reduce consumption of energy. The Environment section of the SPD provides more guidance on the opportunities that could be incorporated to help reduce demand for energy.
18. To take into account the changing climate	-	-	-	Development of the THV will result in urbanisation of a greenfield site. This type of site provides various ecosystem services such as absorption of water, maintaining temperatures and reducing the urban heat island effect, all of which will become more important in helping adaptation towards climate change. The amount of development required in this location will result in increased massing which could also	D	P	DA7 requires development to not lead to an increase in risk of surface water flooding. CP8 also has various requirements which will mitigate these impacts. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk and manage water, and

				exacerbate the urban heat island effect and will also reduce the sites ability to absorb water, which could result in greater flood risk and impact on the ability to adapt to climate change.			also on providing opportunities for biodiversity which will both help to manage water and help with temperature regulation and therefore climate change adaptation. In addition, delivery of a school could include playing-fields/school grounds could help with water management.
19. To encourage new developments to meet adopted sustainable building standards.	-	-	-	This section of the SPD does not have any reference to achieving sustainable building standards.	I	P	CP8 requires non-residential major development on greenfield sites to achieve BREEAM excellent.
20. Integrated transport links and accessibility to services.	+	+	+	This section of the SPD suggests that the school should be accessible from both the new development and from the wider residential areas. This section also refers to having links between the school and the SNCI, the SDNP and the A27. The school as a community focal point located with other uses could help ensure that a variety of uses and services are located within close proximity.	D	P	Other sections of the SPD have greater details in terms of facilitating access to the site including the Transport & Travel section and the Public Realm section.
21. To reduce waste generation and increase material efficiency	-	-	-	A school development will result in waste generation.	I	T	Construction stage waste will be required to be managed in accordance with the Waste & Minerals Local Plan policies. Policy CP8 should ensure that waste is minimised at operation stage. The Environment section of the SPD refers to ensuring high standards of construction, including waste management, and refers to choosing building materials based on their

							performance and low maintenance over time, both of which would have positive impacts for the reduction in waste.

Community and Retail

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	0	0	0	The delivery of community uses are considered to have negligible effects on biodiversity, although will depend in the ecological value of the existing habitat.			Development could provide opportunities to provide net gains in biodiversity.
2. Air quality	+	+	+	The delivery of community uses would enable residents to meet some of their day to day needs on site. This would help to reduce the need to travel having benefits for air quality. The delivery of community uses in a cluster/neighbourhood centre would also support this.	I	P	
3. Local distinctiveness and historic environment.	++	++	++	The delivery of community uses, particularly where clustered together in a neighbourhood centre, would help to create a vibrant and distinctive neighbourhood area with its own character.	D	P	
4. SDNP	+	+	+	The community uses required to be delivered include a SDNP interpretation/education facility. This would support visitor access and understanding of the SDNP.	D	P	
5. Housing	0	0	0	The delivery of community uses are considered to have no direct or indirect effects on provision of housing. However they will be important to help support the needs of the future residents.			
6. To reduce car journeys and encourage	+	+	+	The delivery of community uses would enable residents to meet some of their day to day needs on site and would help to reduce the need to travel further afield to meet this needs. The delivery of	D	P	

more sustainable modes of transport.				community uses in a cluster/neighbourhood centre would also support this.			
7. Minimise pollution to water	-	-	-	The site is located within Groundwater Source Protection Zone 2. The SFRA shows the western edge of the site to be at risk of deeper water flooding. Any development on the site will result in the loss of a greenfield site which has a role in water absorption and will result in an increase in urbanised non-permeable surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere.	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk.
8. Minimise water use	-	-	-	Community uses including shops and doctors and SDNP resource will also increase demand for water.	I	P	DA7 requires the development to be an exemplar sustainable development and will be required to meet other City Plan policy requirements including CP8 which requires non-residential development on greenfield sites to achieve BREEAM excellent. This will include incorporating measures to reduce water consumption.
9. To promote the sustainable development of land affected by contamination.	?	?	?	It is unknown whether the site has any potential for contamination and therefore whether community based development would have any impacts on this objective.			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were found on site.
10. Employment creation	+	+	+	Delivery of community uses, including a doctors, shops and so on would provide employment opportunities on site, some of which may provide opportunities for residents to work on site.	D	P	
11. Economic development	+	+	+	Delivery of community uses, including a doctors, shops and so on would provide employment	D	P	

				opportunities on site, some of which may provide opportunities for residents to work on site.			
12. To improve the health and reduce health inequalities	+	+	+	Delivery of community uses would help residents to meet their daily needs, would facilitate sustainable access to health and local food and would support the development of a new community, particularly when clustered in a new neighbourhood centre. The uses could also potentially provide local employment opportunities some of the residents and may help integration with the adjacent neighbourhood areas.	D	P	
13. To integrate health and community safety	+	+	+	Delivery of community uses, particularly if clustered to help create a neighbourhood centre, would help to create a focal point for social activity that is valued by the local community. Passive surveillance would be increased through active uses.	I	P	
14. To narrow the gap between the most deprived areas and the rest of the city	0	0	0	Delivery of community uses is considered to have negligible effects on reducing deprivation.			
15. To engage local communities into the planning process	0	0	0	There are no direct or indirect links with this objective.			
16. To make the best use of land available	+?	+?	+?	A multi-use community facility provides the opportunity to co-locate different uses. This which would help to ensure the land is used efficiently.	I	P	
17. To maximise	-	-	-	The development of community uses would result in an increase in demand for energy.	I	P	DA7 requires the development to be an exemplar sustainable development and will

sustainable energy use							be required to meet other City Plan policy requirements including CP8 which requires non-residential major development on greenfield sites to achieve BREEAM excellent. This will include incorporating measures to reduce energy consumption.
18. To take into account the changing climate	-	-	-	Development of the THV site will result in urbanisation of a greenfield site. This type of site provides various ecosystem services such as absorption of water, maintaining temperatures and reducing the urban heat island effect, all of which will become more important in helping adaptation towards climate change. The amount of development required in this location will result in increased massing which could also exacerbate the urban heat island effect and will also reduce the sites ability to absorb water, which could result in greater flood risk and impact on the ability to adapt to climate change.	D	P	DA7 requires development to not lead to an increase in risk of surface water flooding. CP8 also has various requirements which will mitigate these impacts. The Environment and Public Realm sections of the SPD both include guidance on delivering and incorporating opportunities to reduce flood risk and manage water, and also on providing opportunities for biodiversity which will both help to manage water and help with temperature regulation and therefore climate change adaptation.
19. To encourage new developments to meet adopted sustainable building standards.	-	-	-	This section of the SPD does not have any reference to achieving sustainable building standards.	I	P	CP8 requires non-residential development on greenfield sites to achieve BREEAM excellent.
20. Integrated transport links and accessibility to services.	++	++	++	The delivery of community uses would enable residents to meet some of their day to day needs on site, would increase the accessibility of these services and would help to reduce the need to travel further afield to meet these needs. The delivery of community	D	P	

				uses in a cluster/neighbourhood centre would also support this. It may also increase access and availability to these services for residents in adjacent communities.			
21. To reduce waste generation and increase material efficiency	-	-	-	Community and retail uses will result in waste generation.	I	T	Construction stage waste will be required to be managed in accordance with the Waste & Minerals Local Plan policies. Policy CP8 should ensure that waste is minimised at operation stage. The Environment section of the SPD refers to ensuring high standards of construction, including waste management, and refers to choosing building materials based on their performance and low maintenance over time, both of which would have positive impacts for the reduction in waste.

Environment

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	++	++	++	This section of the SPD should have significant positive effects on this objective. It refers to taking opportunities to reduce the ecological footprint, including for example through incorporating green roofs and walls, and through the greening of public streets and spaces. It suggests including elements such as chalk grassland and drought resistant planting which would have benefits for biodiversity, as well as suggests including water management solutions such as rain gardens and ponds, which would also be beneficial for biodiversity.	D	P	
2. Air quality	+	+	+	Although this section of the SPD does not directly	I	T	It is noted that the section on Transport and

				impact on this objective, any biodiversity measures incorporated within the site would also have benefits for air quality.			Travel more directly refers to this, through the suggestion to use vegetation to help reduce traffic noise. This would also help with absorbing air pollutants.
3. Local distinctiveness and historic environment.	0	0	0	There are no direct or indirect impacts on this objective.			
4. SDNP	+	+	+	This section of the SPD is considered to have indirect positive impacts on this objective. The suggestion to incorporate elements such as chalk grassland roofs and green walls would help to minimise visuals impacts.	I	P	
5. Housing	0	0	0	There are no direct or indirect impacts on this objective.			
6. To reduce car journeys and encourage more sustainable modes of transport.	+	+	+	This section of the SPD has some reference to the incorporation of sustainable transport links which would have positive impacts on this objective.	D	P	
7. Minimise pollution to water	++	++	++	Vegetation plays an important role in the absorption of water. This section of the SPD suggests the inclusion of measures such as green roofs, greens walls, rain gardens, swales and ponds, all of which would help absorb water and therefore minimise the risk of pollution to water and surface water flood risk.	D	P	
8. Minimise water use	+	+	+	This section of the SPD refers to taking the opportunity to reduce the ecological footprint of the development, and to deliver high standards of building design. Water management is one of the measures			**This section of the SPD could be strengthened further, e.g. by incorporating a reference to opportunities to minimise water consumption, such as rain-water**

				referred to, however there is no further detail on this.			**harvesting. This could be a measure that becomes more viable to include due to the economies of scale referred to in the SPD under para 6.40.**
9. To promote the sustainable development of land affected by contamination.	0	0	0	There is no reference to remediation of contaminated land in this section of the SPD.			
10. Employment creation	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
11. Economic development	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
12. To improve the health and reduce health inequalities	+	+	+	This section of the SPD could have positive impacts on health through the delivery of energy efficient homes, which reduce the risks associated fuel poverty for inhabitants. In addition, biodiversity and vegetation can help promote a sense of well-being and happiness, supporting good mental health.	I	P	
13. To integrate health and community safety	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
14. To narrow the gap between the most deprived areas and the rest of the city	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			

15. To engage local communities into the planning process	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
16. To make the best use of land available	+	+	+	This section of the SPD suggests measures which have dual functions, such as vegetative features which have benefits for biodiversity as well as providing a role in the management of water and helping adaptability to climate change. Incorporation of measures which are multi-functional will help to make the most efficient use of the land available.	I	P	
17. To maximise sustainable energy use	++	++	++	This section of the SPD refers to taking the opportunity to reduce the ecological footprint of the development, and to deliver high standards of building design. Measures suggested by the SPD include generation of energy, designing buildings to make the most out of passive solar gain, incorporating elements that make can help buildings more energy efficient, such as green roofs, and delivery of district heating. All of these measures would help to reduce demand for energy and have significant positive impacts for this objective.	D	P	
18. To take into account the changing climate	++	++	++	This section of the SPD suggests various measures that would help towards climate change adaptation and therefore have a significant positive impact on this objective.	D	P	
19. To encourage new developments to meet	++	++	++	This section of the SPD refers to numerous measures that would result in the achievement of high standards of sustainable building design.	D	P	

adopted sustainable building standards.							
20. Integrated transport links and accessibility to services.	+	+	+	This section of the SPD has some references to the incorporation of sustainable transport links which would have positive impacts on this objective.	D	P	
21. To reduce waste generation and increase material efficiency	+	+	+	This section of the SPD has some reference to recommending that building materials should be chosen based on their performance and low maintenance over time. This should help reduce waste through the promotion of efficient materials. The SPD also refers to providing opportunities for waste management.	D	P	

Transport and Travel

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	+	+	+	This section of the SPD includes the suggestion to use vegetation as a way of reducing noise impacts from the A27. This could have benefits for biodiversity. It also suggests improving pedestrian and cycle access to the site via the SNCI and this would result in improved access to the SNCI itself.	D	P	
2. Air quality	+	+	+	This section of the SPD in particular sets out recommendations and suggestions for various measures that could be implemented in order to promote sustainable travel and reduce the need to travel by car. This includes providing opportunities for pedestrian and cycle crossing points, designing a	D	T	**This section of the SPD suggests using vegetation to help reduce traffic noise. This would also help with absorbing air pollutants. It is suggested that the SPD could also refer to this benefit.**

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				network of accessible paths, improving access to the site from adjacent areas, promotion of sustainable transport initiatives such as car sharing and public transport use, and measures which would facilitate access to public transport such as an extension of existing bus routes into the site. All measures that help reduce car-based travel would have an associated positive effect on air quality. In addition, this section refers to making use of the SDNP buffer to help reduce traffic noise originating from the A27. This could also help reduce air quality impacts arising from the A27although this isn't referred to in the SPD. It is noted that this section of the SPD refers to traffic calming measures that could help reduce the speed of traffic on King George VI Avenue, such as mini-roundabouts and crossing points. Any measures that result in traffic stop-starting, particularly on a road that has a steep gradient such as this one, could exacerbate air quality problems in that location and this would need to be fully assessed.			**The potential for indirect air quality impacts arising from traffic calming measures would need to be considered. It is recommended that the SPD refer to this under the Noise and Pollution section, or under paragraph 6.45 e.g. "ensuring that options considered for traffic-calming do not have any unacceptable indirect adverse effects for noise or air quality".**
3. Local distinctiveness and historic environment.	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
4. SDNP	+	+	+	This section of the SPD includes a sub-section on improving links to the SDNP by measures such as making improvements to existing links over the A27, by providing information about the SDNP and identifying a broad location for a SDNP gateway. This section also refers to a buffer, which is a measure	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				requested by the SDNPA, which would also help to reduce visual impacts of development.			
5. Housing	0	0	0	There are no direct or indirect impacts on this objective.			
6. To reduce car journeys and encourage more sustainable modes of transport.	+	+	+	This section of the SPD in particular sets out recommendations and suggestions for various measures that could be implemented in order to promote sustainable travel and reduce the need to travel by car. This includes providing opportunities for pedestrian and cycle crossing points, designing a network of accessible paths, improving access to the site from adjacent areas, promotion of sustainable transport initiatives such as car sharing and public transport use, and measures which would facilitate access to public transport such as an extension of existing bus routes into the site. This section of the SPD also refers to traffic calming measures that could help reduce the speed of traffic on King George VI Avenue, such as mini-roundabouts and crossing points, which may help to improve road safety. This section of the SPD does suggest that reasonable levels of car parking would be required based on the assumption that car ownership is likely to be high in this location, however this is not considered to have an adverse effect on this objective.	D	P	It is noted that the SPD does state that any transport and travel options would need to be tested once the location of land uses has been finalised and recommends the development of a travel plan as well as transport assessment.
7. Minimise pollution to water	-	-	-	The site is located within Groundwater Source Protection Zone 2. The SFRA shows the western edge of the site to be at risk of deeper water flooding. Provision of a network or roads and pathways is likely to increase the amount of urbanised non-permeable	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere.			delivering and incorporating opportunities to reduce flood risk.
8. Minimise water use	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
9. To promote the sustainable development of land affected by contamination.	?	?	?	It is unknown whether the site has any potential for contamination.			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were found on site.
10. Employment creation	0	0	0	Although good transport and travel links are key in enabling access to employment, this section of the SPD is not considered to have any direct or indirect links to this objective.			
11. Economic development	0	0	0	Although good transport and travel links are key in enabling access to employment and promoting economic development, this section of the SPD is not considered to have any direct or indirect links to this objective.			
12. To improve health and reduce health inequalities	+	+	+	This section of the SPD includes suggestions for measures which could reduce the need to travel by car and thus have associated benefits for air and noise quality and therefore health. In addition, measures which facilitate active travel will also have associated health benefits.	D	P	
13. To integrate health and community safety	+	+	+	This section of the SPD includes suggestions for measures which could improve road safety, for example measures which reduce the speed of traffic along King George VI Avenue as well as improvements to access and crossing points. It will be	D	P	

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
				important for any scheme to consider the safety of young people travelling to the site from adjacent areas for school.			
14. To narrow the gap between the most deprived areas and the rest of the city	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
15. To engage local communities into the planning process	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
16. To make the best use of land available	+	+	+	Although this section of the SPD suggests that reasonable levels of car-parking should be accommodated, it does also suggest that minimal on-site parking should be implemented in order to promote sustainable transport. Providing minimal on-site car-parking would make better use of the site, than maximum provision.	I	P	
17. To maximise sustainable energy use	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
18. To take into account the changing climate	-	-	-	Provision of a network or roads and pathways is likely to increase the amount of urbanised non-permeable surfacing. This could increase the risk of flood risk and pollution to water on site and elsewhere.	D	T	DA7 requires the protection of GSPZ and requires development to not lead to an increase in risk of surface water flooding. The Environment and Public Realm sections of the SPD both include guidance on

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
							delivering and incorporating opportunities to reduce flood risk.
19. To encourage new developments to meet adopted sustainable building standards.	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
20. Integrated transport links and accessibility to services.	++	++	++	This section of the SPD sets out a range of suggested measures which would improve and increase access to the site by various forms of transport. It includes measures such as traffic-calming, crossing points, improved access points, the creation of a network of paths and roads and the extension of bus routes into the site. All of these measures would have a positive impact on this objective.	D	P	
21. To reduce waste generation and increase material efficiency	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			

Public Realm and Blue/Green Infrastructure

Sustainability Objective	S	M	L	Summary of Effects	Dir/ Ind	Perm/ Temp	Mitigation
1. Biodiversity	++	++	++	This section of the SPD includes various suggestions	D	P	

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				which would have positive impacts for biodiversity. This includes the incorporation of green infrastructure across the site, the incorporation of nature-based sustainable drainage systems, and the incorporation of community food growing areas/small scale allotments. This section of the SPD also recommends incorporating the restored and enhanced SNCI into the public realm network, which would improve access to the SNCI. The buffer zone requested by the SDNPA also provides opportunities for increasing biodiversity.			
2. Air quality	+	+	+	Vegetation plays an important role in helping to maintain air quality, through the absorption of air pollutants. This section of the SPD therefore has indirect positive effects on this objective.	I	T	
3. Local distinctiveness and historic environment.	+	+	+	An attractive and cohesive public realm plays an important role in helping to create an attractive environment with a sense of place. This section of the SPD suggests measures which would result in a quality public realm, such as the creation of flexible spaces, the incorporation of nature, the incorporation of informal play and fitness opportunities and opportunities food growing.	D	P	
4. SDNP	+	+	+	This section of the SPD refers to incorporation of a buffer zone to help minimise visual impacts. This would have a positive effect on this objective.	D	P	
5. Housing	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
6. To reduce car journeys and	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			

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encourage more sustainable modes of transport.							
7. Minimise pollution to water	+	+	+	This section of the SPD suggests measures which would help to minimise flood risk and therefore pollution to water. For example, the incorporation of nature-based sustainable drainage systems. This section of the SPD specifies the importance of incorporating water management infrastructure into the public realm network.	D	P	
8. Minimise water use	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
9. To promote the sustainable development of land affected by contamination.	?	?	?	It is unknown whether the site has any potential for contamination.			CP8 requires development to reduce land pollution and would therefore have a positive impact on this objective if contamination were found on site.
10. Employment creation	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
11. Economic development	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
12. To improve health and reduce health inequalities	+	+	+	This section of the SPD sets out various measures that would help to create an attractive and cohesive public realm, which is fully accessible and incorporates opportunities for informal and formal play and recreation, having benefits for physical health.	I	P	

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				The SPD suggests ensuring the public realm network is integrated into the development to enable good opportunities for social interaction between the various sections of the community and also enable passive surveillance. This would help to create a cohesive and sociable community, helping to support good health and well-being.			
13. To integrate health and community safety	+	+	+	This section of the SPD suggests that the public realm network should be designed to allow good social interaction between residents, which would help in community safety by providing passive surveillance. Measures which allow for positive interaction between different sections of the community, for example younger and older can also help to promote community safety.	I	P	
14. To narrow the gap between the most deprived areas and the rest of the city	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
15. To engage local communities into the planning process	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
16. To make the best use of land available	++	++	++	This section of the SPD suggests out various measures which would help to make the best use of land available. For example, through incorporating water management systems within open spaces,	D	P	

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				through incorporating informal opportunities for play and health within the wider public realm network, incorporating food growing opportunities into the fabric of the development, using nature-based sustainable drainage systems that have multiple benefits and through the creation of flexible spaces that can perform different functions.			
17. To maximise sustainable energy use	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
18. To take into account the changing climate	+	+	+	This section of the SPD suggests various measures that would help to adapt to climate change. This includes the incorporation of nature-based SUDS to help absorb surface water and reduce flood risk and the incorporation of biodiversity and vegetation which would help to maintain temperatures and mitigate against potential increases in localised temperature associated with increased massing and urban environments.	D	P	
19. To encourage new developments to meet adopted sustainable building standards.	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			
20. Integrated transport links	+	+	+	This section of the SPD suggests that the public realm, which includes a network of pathways, public	D	P	

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and accessibility to services.				spaces and open spaces, should be weaved into the development. A well designed network of pathways and roads will help to link the site, both internally as well as with adjacent neighbourhoods, and therefore will promote access to services within the site.			
21. To reduce waste generation and increase material efficiency	0	0	0	This section of the SPD has no direct or indirect impacts on this objective.			