

Brighton & Hove City Plan Part One

March 2016

Sustainability Appraisal Non Technical Summaries



Brighton & Hove
City Council

Background

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

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

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

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

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

Brighton & Hove Submission City Plan Part One

Proposed Further Modifications to Policy CP8 Sustainable Buildings

September 2015

Sustainability Appraisal Non-Technical Summary Addendum



**Brighton & Hove
City Council**

Sustainability Appraisal – Further Modifications to CP8 Sustainable Buildings

September 2015

Non-Technical Summary

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Section 1 Introduction

Background

- 1.1 This report is the Non-Technical Summary of the Sustainability Appraisal Addendum of the Further Proposed Modifications to CP8, Brighton & Hove City Plan Part 1.
- 1.2 The City Plan Part 1 is the first Development Plan Document (DPD) to be produced as part of a wider set of local planning policy documents. It contains 8 Development Area policies, 6 Special Area policies and 22 Citywide policies. Its purpose is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives.
- 1.3 The City Plan Part 1 was submitted in June 2013 and proceeded to Examination in Public during October 2013. Following the EIP, 116 Proposed Modifications were made to the City Plan some of which were to address soundness issues. These were consulted upon during October to December 2014. The results of this consultation were submitted to the Planning Inspector and resulted in the publication of the Inspector's Further Issues and Matters.
- 1.4 Following the Further Issues and Matters, a number of further proposed modifications were put forward. In addition, there were modifications arising from the publication of the draft Objectively Assessed Need for Housing: Brighton & Hove, June 2015 (GL Hearn). These were consulted upon during July and August 2015.
- 1.5 During the consultation on the Further Modifications, the Government published Fixing the Foundations, which confirms the intention to remove the Zero Carbon Homes Allowable Solutions scheme and the requirement for residential development to meet increased energy standards. The Inspector subsequently wrote to the Council with two possible courses of action to ensure that the City Plan was in conformity with national policy, particularly regarding policy CP8 Sustainable Buildings.
- 1.6 In order to ensure the likely effects of implementing the modified Plan are understood, the SA at this stage has assessed the impacts of the Further Modifications to CP8 against the Sustainability Appraisal Framework.
- 1.7 The Sustainability Appraisal Addendum does not repeat information provided at earlier stages, and should be read in conjunction with the Submission 2013 Sustainability Appraisal, Proposed Modifications Addendum 2014 and Further Modifications, July 2015. Equally, this Non-Technical Summary should be read alongside previous Non- Technical Summaries.

Links to other Plans and Programmes

- 1.8 In March 2012, the Government published the National Planning Policy Framework. This established the approach to achieving sustainable development and places importance of ensuring that Local Plan policies contribute to achieving sustainable development. The City Plan has been prepared in compliance with the NPPF.
- 1.9 The City Plan has also been developed in accordance with the aims and objectives of numerous other plans and programmes, as has the Sustainability Appraisal Framework which tests the City Plan. A list of Plans, Programmes and Strategies that forms the basis for the Framework be found in [Annex 1 Sustainability Appraisal: Plans Programmes and Guidance](#).

Section 2 Key Characteristics and Sustainability Issues in Brighton & Hove

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

- The Ecological Footprint is higher than the regional and national average
- The need to continue to reduce carbon emissions from all sources, with the proportion of domestic sources of carbon emissions higher than the national and regional averages.
- Flood risk; including tidal, surface water and groundwater
- Air quality; NO₂ continuing to exceed the Air Quality Objective in some areas.
- Congestion, noise and poor air quality resulting from transport particularly in central areas
- Groundwater quality (Brighton Chalk Aquifer) classified as “poor”
- The city is within a “highly water stressed” region with above regional average water consumption
- An additional 167ha of various types of open space will be needed by 2030 in order to maintain its quantity standards to meet the needs of the projected population.
- An increasing population, with an increase of over 10% in the period between 2001 and 2011 to 273,000.
- The city has the highest rate of over-crowding outside London
- The city’s housing remains largely unaffordable to the majority of its residents, with the average property costing over ten times the average income
- The annual need for both affordable and market housing is far greater than actual build levels
- The city is ranked as the 66th most deprived in England
- Health inequalities exist throughout the city with marked differences in life expectancy between the most deprived and most affluent areas
- The city needs to develop high value businesses locally to retain higher skilled workers
- The city lacks affordable business accommodation
- There is evidence of the city developing a dual economy, with a high proportion of highly skilled jobs supported by a growing number of lower paid workers
- 8% of the working age population have no qualifications and educational attainment in secondary schools is below average
- The universities are growing along with the increasing requirements for student accommodation

2.2 Positive achievements include:

- An overall reduction in annual CO₂ tonnes per capita since 2005
- Levels of car ownership lower than national and regional averages
- Levels of travel to work by car lower than national and regional averages
- Year on year reduction of percentage of waste being disposed of at landfill
- The city contains a wealth of diverse designated wildlife sites of international, national and local significance
- The city includes areas of land falling within the South Downs National Park
- The city has an extremely attractive historic built environment including over 3400 listed buildings, 15 Scheduled Ancient Monuments, 6 Registered Parks and Gardens and 34 Conservation Areas.
- The city has one of the most highly qualified adult populations in the country, with 43% having a Level 4 (or equivalent) qualification

- The city contains the Regional Shopping Centre and contains significantly more shops compared to other city's of similar size, including a strong reputation for specialist retailers
- The city is a regional centre for employment and is home to the biggest cluster of creative and digital technology industries in the south east outside London
- Housing delivery in the city is showing signs of recovery from the economic recession, with housing completions annually increasing since 2010/2011 although still not reflective of pre-recession rates.

The full baseline information can be found in Appendix B Submission City Plan Sustainability Appraisal Report.

Section 3 Areas of Particular Environmental Importance

3.1 There is one Special Area of Conservation (SAC) that falls partially within the administrative boundary of Brighton & Hove. There are three other SACs and one that is both a SAC and a Special Protected Area within 20km of Brighton & Hove.

3.2 The following table outlines the current issues and problems at these sites which are of relevance to the City Plan Part 1.

Site	Potential Issues and problems	Closest distance to BH (km)
Castle Hill SAC	Air pollution or inadequate grazing can lead to scrub encroachment. Leaching and spray drift from surrounding farmland.	Within boundary
Lewes Downs SAC	Air pollution can exacerbate scrub encroachment. Leaching and spray drift from surrounding farmland.	6
Ashdown Forest	Air pollution can exacerbate scrub encroachment. Increased water abstraction could result in drying out of the site. Recreational disturbance to the site.	19.5
Arun Valley	Increase in water demand resulting from increased population may alter hydrological regime.	20

3.3 A screening under the Habitats Regulations Assessment was most recently carried out on the City Plan Proposed Modifications 2014, which includes development within the urban fringe. The screening exercise discounted all possible impacts of the City Plan on European sites.

Section 4 Sustainability Appraisal Framework and Methodology

Sustainability Appraisal Framework

4.1 The review of the plans, policies and programmes that are relevant to the sustainable development of the Plan area at Scoping stage identified key policy objectives which have to be taken into account by the City Plan. These policy objectives helped to inform the development of the Sustainability Appraisal Framework, which has then been used to test how the City Plan contributes to achieving sustainable development. The following Sustainability Appraisal Objectives make up the framework:

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.
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.
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes and their settings, townscapes, parks, buildings and archaeological sites effectively.
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.
5. To meet the essential need for decent housing, particularly affordable housing.
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.
7. Minimise the risk of pollution to water resources in all development.
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
9. To promote the sustainable development of land affected by contamination.
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
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.
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.
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.
14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
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.
16. To engage local communities into the planning process.
17. To make the best use of previously developed land.
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.
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
20. To encourage new developments to meet the high level Code for Sustainable Homes/BREEAM 'Excellent' standard.

21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and food stores.
22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

It is noted that Objective 20 is now somewhat out of date due to the March 2015 Written Ministerial Statement that confirms the winding down of the Code for Sustainable Homes. However, the reference to BREEAM is still applicable and therefore this part of the objective remains.

Methodology

4.2 This appraisal has used the Sustainability Appraisal Framework as set out above. The following scoring system has been used to show the likely impact.

4.3 Key

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

4.4 In the policy re-assessments, multiple symbols have been used to show significance. In addition, the uncertain symbol can be used in addition to either a positive or adverse impact.

Difficulties encountered

- 4.5 Some difficulties were encountered when undertaking the assessment. Data has been collected to show the conditions and potential trends of issues affecting Brighton & Hove. Some data sets can be more reliable than others, whereas others may be out of date and less reliable, making it difficult to quantify effects with certainty.
- 4.6 It is also difficult to quantify certain impacts, for example the exact impacts on energy consumption that building 13,200 homes to the 19% carbon reduction improvement will have compared to building to zero carbon homes.
- 4.7 The assessment of significance is also difficult to quantify. Certain thresholds have been set by legislation, e.g. limits of air pollutants, which make it easier to assess significance, however these limits are not available for all indicators.

Section 5 Summary of assessment of Policy CP8 (v1)

5.1 Two versions of policy CP8 have been assessed at this stage. This section summarises the findings of the assessment of version 1. The full assessment against the SA Framework can be found in Appendix B of the main SA Report.

The main changes to the policy at this stage can be summarised as follows:

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

Summary of Impacts on SA Objectives from this stage

	1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste
V1	+?	+?			+?		+?	+?	+?			+?	+?		+?		+?	+?	+?	+?		+?

Overall Summary

5.2 The amendments to the policy were found to change the assessment findings of the previous iteration of the policy for the following objectives: biodiversity (1), air quality (2), water pollution (7), water consumption (8), development of contaminated land (9), health (13), deprivation (15), making the best of previously developed land (17), sustainable energy and climate change mitigation (18), climate change adaptation (19), meeting BREEAM (20), reducing waste (22). All of these impacts were changed from either positive or significantly positive (+) or (++) to positive uncertain (+?) across all timescales. This is based on the policy still having the potential to have positive impacts across these objectives, through the delivery of various sustainable building design features, however is considered to be uncertain due to the change in policy

text from “requires” to “expects”, which no longer makes it an actual requirement to meet targets or deliver features set out in the policy.

- 5.3 The impacts for the housing (5) and economic development (12) objectives were still found to be positive uncertain (+?). This is based on the change in policy wording, and the removal or change in various standards which may help to bring house-building forward and stimulate economic growth, although this is also considered uncertain.
- 5.4 Overall the policy still has the potential to deliver positive impacts, particularly for the environmental objectives, however these are more uncertain and are not as positive as previous iterations of the policy. The SA considers the ability of the policy to secure sustainability benefits and achieve the desired standards to be compromised.

Impacts on SA objectives of change in policy wording from “requires” to “encourages” / “expected”

- 5.5 The removal of the word “requires” removes the council’s ability to formally ensure that desired standards set out in Part 1 of the policy are achieved, and the sustainability benefits set out Part 2 of the policy are delivered. This change in wording could result in few sustainability benefits being achieved or delivered and brings about a great deal of uncertainty across all environmental SA objectives. Overall, the SA found this change in wording to weaken the policy and compromises the ability of the policy to secure and deliver sustainability benefits
- 5.6 At Further Modifications (July 2015) stage, the SA concluded that the removal of the requirement to meet the Code for Sustainable Homes, an assessment tool which is externally audited and certified, meant that the ability of the policy to ensure delivery of wider sustainability benefits, was somewhat compromised. At that stage, however part 2 (a-o) of the policy still required development to demonstrate various sustainable design features. Now that the formal requirement to demonstrate these features has been removed, the SA considers the policy to be compromised even further.

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

- 5.7 The requirement to meet zero carbon homes standards has now been replaced with the “expectation” to meet the 19% carbon reduction against Part L Building Regulations 2013. This is not as strong as the previous policy position which would have meant achieving 100% carbon reduction against Part L (post 2016) and has direct implications for energy consumption, carbon emissions, the local ecological footprint and climate change and is directly related to SA objective 18 – maximise sustainable energy and mitigate climate change.
- 5.8 This also impacts upon SA objective 13 – health, and SA objective 15 – deprivation, due to the potential for zero carbon homes to have helped address fuel poverty in new development, as well as potentially in existing housing stock through the Allowable Solutions scheme. Although homes built to the new standard will have increased energy efficiency compared to building standards, they will not be as efficient as they could have been under previous iterations, with highly efficient homes clearly benefitting all, but particularly benefitting those that may be suffering from economic deprivation.

- 5.9 The Brighton & Hove Energy Study 2012 maps out how carbon reduction targets can be met. At the time, it found that new development was expected to increase the carbon footprint by 8%, and relied on various other measures to ensure carbon reduction targets are met, including 19% of the carbon reduction coming from the retrofit of existing residential buildings and 11% from the retrofit of non-residential developments. However the Energy Study was based on new residential development from 2016 meeting 100% carbon reduction improvement against Part L Building Standards. This means that carbon reduction from other sources will now need to be even greater if the city is to achieve its carbon reduction targets and questions the ability to achieve these targets.
- 5.10 The removal of this requirement could have positive impacts on SA objective 5 – housing delivery and SA objective 12 – economic development. It is the government’s intention to “remove un-necessary burdens” from house-building in order to stimulate economic growth. Therefore the change in requirements could help to bring forward house-building, having positive implications for economic development, however there is no evidence to support this, and is therefore considered to be uncertain.

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

- 5.11 The requirement for conversions / change of use to residential to meet BREEAM “very good” has been deleted entirely and not replaced with any other standard. This is considered to directly impact on SA objectives 7 – pollution to water; 8 – water consumption; 13 – health; and 18 – sustainable energy, as the BREEAM Refurbishment standard required development to achieve mandatory credits across all these issues. Part 2 of the policy still “expects” conversions to demonstrate how various issues are addressed, but as discussed above, this is no longer a requirement and may result in little sustainability benefits being delivered from conversions.
- 5.12 For context, over the five year period from 2009/10 to 2013/14 an average of 34% of residential completions have been from either conversions or changes of use. This represents a fairly high proportion of developments that will no longer be required to meet any kind of sustainability standards in the future.

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

- 5.13 Non-residential development is no longer “required” to meet “outstanding” BREEAM in the post 2019 period but instead is “expected” to achieve either “very good” for non-major or “excellent” for major. This is not as strong as previous policy iterations and is considered to directly impact upon SA objectives 1 – biodiversity, 8 – water consumption, 18 – sustainable energy/climate change mitigation, and 22 waste reduction, as the BREEAM scheme requires development to achieve mandatory credits for these issues, with more being asked from developments in order to achieve the outstanding standard. This will particularly impact on the amount of energy used and carbon emitted from the development, with much higher standards expected in order for a development to achieve outstanding.
- 5.14 The removal of this requirement could have positive impacts on SA objective 12 – economic development as could help to bring forward the building of new commercial, office, industrial or retail development. However, this is fairly uncertain.

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

- 5.15 The Allowable Solutions scheme was linked to the Zero Carbon Homes standard and provided a mechanism for the potential pooling of money, secured from development which could not meet its on-site energy efficiency requirements in full. These could then have been used to improve the energy efficiency of existing housing stock. As described above, the Energy Study 2012 concluded that improvements to the existing building stock would be required for the city to meet its CO2 reduction targets. The removal of the Allowable Solutions scheme and the potential to secure funding through developer contributions, combined with the lowering of energy standards will therefore lead to an increase in the energy consumed, as well as removing the potential for improving existing stock and will have implications on the city's ability to meet CO2 reduction targets. This impacts directly upon SA objective 18 – energy and mitigating climate change. This may also have implications for fuel poverty, affecting SA objectives 13 - Health and 15 – Deprivation.
- 5.15 The removal of this requirement could have positive impacts on SA objective 5 – housing delivery and SA objective 12 – economic development as the removal of this requirement would reduce the costs for house-builders, improve viability and potentially bring forward house-building.

Initial SA Recommendations

- 5.16 The changes to Policy CP8 will result in less positive impacts against various environmental objectives. These impacts are also considered to be uncertain compared to previous iterations of the policy.
- 5.17 It is understood that the majority of the changes have been made in order to ensure the policy does not conflict with national requirements and therefore cannot be avoided. However, the SA recommends that the wording is changed back to “required”, where possible, in order to strengthen the policy and ensure minimum standards are met and to ensure the policy's ability to secure sustainability benefits is not completely compromised.

City Plan Response

- 5.18 Policy CP8 wording in Part 1 will be revised as follows (revision in **highlight**):

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

No further revisions will take place.

Section 6: Summary of Policy Re-assessment – CP8 Sustainable Buildings V.2

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

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

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

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

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

	1 Biodiversity	2 Air Quality	3 Distinctiveness	4 South Downs	5 Housing	6 Car journeys	7 Water pollution	8 Water use	9 Contamination	10 Coastal flooding	11 Employment	12 Economic Development	13 Health	14 Comm. Safety	15 Deprivation	16 Engagement	17 Use of PDL	18 Energy use	19 Climate change adaptation	20 BREEAM/CSH	21 Accessibility	22 Waste
V1	+?	+?			+?		+?	+?	+?			+?	+?		+?		+?	+?	+?	+?		+?
V2	+	+?			+?		+?	+	+?			+?	+?		+?		+?	+	+?	+		+

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

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

Summary of SA findings which remain unchanged from V1

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

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

- 6.5 Part 2 of the policy sets out certain issues to address which includes air quality, flood risk, land contamination, making the best use of land and climate change adaptation. This could bring about some positive impacts against relative SA objectives 2, 7, 9, 17 and 19. However there is still uncertainty as to whether any of these issues will be addressed due to the change in policy wording in Part 2. None of these issues are mandatory requirements within the BREEAM scheme, and therefore would not be delivered as part of meeting the standard, unlike those relating to biodiversity, water consumption, energy consumption and waste reduction.
- 6.6 This uncertainty is also considered to impact upon the SA objective for health (13), as all of these issues can be indirectly linked to health.

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

- 6.7 The removal of this requirement will impact upon the energy consumed by residential developments, affecting SA objective 18 – energy/climate change mitigation, and prevents the impact from being significantly positive. However, overall the impact for this objective is considered to be positive for this objective, due to other policy requirements for both residential and non-residential development set out in Part 1.
- 6.8 The removal of the zero carbon homes standard and the Allowable Solutions scheme could indirectly impact upon SA objectives for health (13) and deprivation (15). This is due to the potential for zero carbon homes to have helped contribute towards addressing fuel poverty in new development, as well as potentially in existing housing stock. The combination of changes to the policy has resulted in the positive impact for health being less significant than former iterations.

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

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

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

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

Overall impacts on SA Objectives for Housing and Economic Development

- 6.11 The SA still found the impacts for the housing (5) and economic development (12) objectives resulting from all the modifications to be positive uncertain (+?). This is based on the removal or change in various standards, as well as the change in policy requirements in Part 2, which may help to bring development forward and stimulate economic growth, although this is also considered uncertain.

Conclusion

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

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

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

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

Section 7 Implications of the changes to CP8 on other City Plan policies

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

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

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

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

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

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

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

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

Section 8 Mitigation & Recommendations

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

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

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

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

Section 9 Cumulative Impacts

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

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

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

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

Positive impacts:

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

Adverse impacts are considered to be:

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

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

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

Section 10: Monitoring

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

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

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

Monitoring against these indicators will be essential in determining the effect of implementing policy CP8.

Appendix A – Selection / Rejection of Alternatives

This section only includes policy CP8

Stages:

PO 2006 – Preferred Options

RPO 2008 – Revised Preferred Options

SUB 2010 – Submission Core Strategy

DCP 2012 – Draft City Plan

SUB 2013 – Submission City Plan

PM 2014 – Proposed Modifications

FM 2015 – Further Modifications (July 2015)

FMCP8 2015 – Further Modifications to CP8 (September 2015)

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

<p>approach, building on DCP 2012 however deferring the requirements of meeting higher standards to later on in the plan period.</p>		<p>above for the medium and long term, although less significantly positive against some objectives in the shorter term due to relaxation in standards required to be achieved. Adverse impacts still anticipated against the housing objective, however the policy allows viability of a scheme to be a consideration.</p>
<p>CP8 Preferred Policy Approach, building on SUB 2013, however reducing the environmental building standards required for residential development across all timescale and removing any difference for residential development on Greenfield sites to achieve higher standards than those on PDL. Further requirements added relating to development being required to reduce land pollution, and added protection for groundwater protection zones.</p>	<p>PM 2014</p>	<p>Impacts mainly as described under SUB 2013. Impacts considered to be significantly positive across relevant objectives, including those relating to water and energy minimisation, and meeting building standards despite the change in policy. Relaxation of building standards required to be achieved impacts positively on viability and the housing objective, which is a change from the previous position. Additional requirements relating to land pollution and protection of groundwater impact positively on relevant objectives.</p>
<p>Amended Policy Approach, removing references to Code for Sustainable Homes, replacing them with a standard for energy performance and water efficiency for residential development. Reference to the future exemption from Allowable Solutions added. Changes to bring policy in accordance with national policy.</p>	<p>FM July 2015</p>	<p>Amended policy not as strong as previous version on some SA objectives, namely biodiversity (1), water minimisation (8) and energy consumption (18) in the long term due to removal of Code for Sustainable Homes standards and reference to the introduction of exemption from Allowable Solutions from small sites. The exemption from Allowable Solutions also impacts on the objective for reducing deprivation, making this more uncertain, due to the impact this could have on enabling the energy efficiency improvements on existing housing stock and subsequent reductions in fuel poverty. Conversely, the exemption from Allowable Solutions was found to have a minor positive impact on both the housing and economic development objective, which is an improvement from the previous iteration, although was considered to be fairly uncertain and will depend on implementation. All other impacts remain the same as the previous iteration including positive impacts on air pollution, reducing car journeys, minimising water pollution, promoting development of contaminated land, improving health, promoting development of</p>

		previously developed land, meeting BREEAM, and reducing waste, however it is noted that implementing the policy may be compromised without the requirement to meet Code for Sustainable Homes and the quality assurance system this involved.
Amended Policy: change in policy wording with removal of “requires” and replacement with “expects; deletion of zero carbon homes standards and allowable solutions scheme; deletion of standards for residential conversions; reduction in standards for non-residential development.	FM CP8 Sep 2015 (V1)	<p>The amended policy is not considered to be as strong as previous iterations due to the removal of the “requirement” for certain standards or sustainability benefits to be delivered. This has resulted in an uncertain impact across all relevant objectives.</p> <p>The policy still has numerous references which could result in positive impacts, albeit now uncertain, for various objectives including those relating to biodiversity, air quality, water pollution, water consumption, contaminated land, health, deprivation, previously developed land, sustainable energy & climate change mitigation, adapting to climate change, meeting BREEAM, and reducing waste.</p> <p>In addition, the changes could have beneficial impacts for objectives relating to the delivery of housing and economic development, with the government indicating that removal of requirements should stimulate house-building, however this is also considered to be uncertain.</p> <p>The policy is no longer anticipated to result in any significant positive impacts, due to the change in policy wording as described above. The policy could still have the ability to result in positive impacts for some relevant objectives, however this is considered to be uncertain. There are no adverse impacts associated with this policy.</p>
V2. Amended Policy: policy now requires development to meet certain standards, as per earlier versions; change in policy wording with removal of “requires” and replacement with “expects in Part 2 of the policy; deletion of zero carbon homes standards and allowable solutions scheme; deletion of standards for residential conversions; reduction	FPM Sep 2015 (v2)	<p>This version of policy requires certain standards to be met, and this is considered to have positive impacts for objectives relating to biodiversity, water consumption, energy consumption and the reduction of waste, due to these topics requiring mandatory credits under the BREEAM scheme. In addition, residential development is also required to meet certain standards which should have positive impacts for water and energy consumption reduction. However it is noted that the change in requirements from earlier iterations will mean that both water and energy reduction will not be as great as with previous versions, meaning that the policy is not anticipated to have significant positive impacts for these objectives.</p> <p>The amended policy is not considered to be as strong as previous iterations for some of the other</p>

<p>in standards for non-residential development.</p>		<p>environmental objectives due to the removal of the “requirement” in Part 2 of the policy to demonstrate certain sustainability benefits. The policy still has numerous references in Part 2 which could result in positive impacts, however are now considered to be uncertain for objectives relating to air quality, water pollution, contaminated land, previously developed land, and climate change adaption.</p> <p>In addition, this change in wording along with the removal of the requirement to meet zero carbon homes standards and references to the Allowable Solutions scheme reduces the policy’s ability to contribute towards reducing fuel poverty, impacting on the health and deprivation objectives.</p> <p>The changes could have beneficial impacts for objectives relating to the delivery of housing and economic development, with the government indicating that removal of requirements should stimulate house-building, however this is also considered to be uncertain.</p> <p>There are no adverse impacts associated with this policy</p>
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**Brighton & Hove
City Council**

Brighton & Hove Submission City Plan Part One

Further Proposed Modifications

June 2015

Sustainability Appraisal Non-Technical Summary Addendum



Brighton & Hove
City Council

Sustainability Appraisal – Further Proposed Modifications June 2015

Non-Technical Summary

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Section 1 Introduction

Introduction

- 1.1 This report is the Non-Technical Summary of the Sustainability Appraisal Addendum of the Further Proposed Modifications to Brighton & Hove City Plan Part 1.
- 1.2 The City Plan Part 1 is the first Development Plan Document (DPD) to be produced as part of a wider set of local planning policy documents. It contains 8 Development Area policies, 6 Special Area policies and 22 Citywide policies. Its purpose is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives.
- 1.3 The City Plan Part 1 was submitted in June 2013 and proceeded to Examination in Public during October 2013. Following the EIP, 116 Proposed Modifications were made to the City Plan some of which were to address soundness issues. These were consulted upon during October to December 2014. The results of this consultation were submitted to the Planning Inspector and resulted in the publication of the Inspector's Further Issues and Matters.
- 1.4 Following the Further Issues and Matters, a number of further proposed modifications have been put forward, which either respond to matter 2 and matter 3, or respond to consultation comments. In addition, there are additional proposed modifications arising from the publication of the draft Objectively Assessed Need for Housing: Brighton & Hove, June 2015 (GL Hearn). Any modifications must be subject to SA to ensure the likely sustainability effects of implementing the Plan are assessed, documented and understood.
- 1.5 In order to ensure the likely effects of implementing the modified Plan are understood, the SA at this stage has assessed the impacts of some of the Further Proposed Modifications against the Sustainability Appraisal Framework. In addition, the SA considered the need to assess an alternative option for the housing target based on the updated Objectively Assessed Need, although discounted this on grounds that this was not a reasonable alternative.
- 1.6 The Sustainability Appraisal Addendum does not repeat information provided at earlier stages, and should be read in conjunction with the Submission 2013 Sustainability Appraisal and Proposed Modifications Addendum 2014. Equally, this Non-Technical Summary should be read alongside the Submission 2013 Non-Technical Summary and Proposed Modifications NTS 2014.

Links to other Plans and Programmes

- 1.7 In March 2012, the Government published the National Planning Policy Framework. This established the approach to achieving sustainable development and places importance of ensuring that Local Plan policies contribute to achieving sustainable development. The City Plan has been prepared in compliance with the NPPF. The City Plan has also been developed in accordance with the aims and objectives of numerous other plans and programmes, as has the Sustainability Appraisal Framework which tests the City Plan. A list of Plans, Programmes and Strategies that forms the basis for the Framework be found in [Annex 1 Sustainability Appraisal: Plans Programmes and Guidance](#).

Section 2 Key Characteristics and Sustainability Issues in Brighton & Hove

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

- The Ecological Footprint is higher than the regional and national average
- The need to continue to reduce carbon emissions from all sources
- Flood risk; including tidal, surface water and groundwater
- Air quality; NO₂ continuing to exceed the Air Quality Objective in central areas
- Congestion, noise and poor air quality resulting from transport particularly in central areas
- Groundwater quality (Brighton Chalk Aquifer) classified as “poor”
- The city is within a “highly water stressed” region with above regional average water consumption
- An additional 167ha of various types of open space will be needed by 2030 in order to maintain its quantity standards
- An increasing population, with an increase of population of over 10% in the period between 2001 and 2011 to 273,000.
- The city has the highest rate of over-crowding outside London
- The city’s housing remains largely unaffordable to the majority of its residents, with the average property costing over ten times the average income
- The annual need for both affordable and market housing is far greater than actual build levels
- The city is ranked as the 66th most deprived in England
- Health inequalities exist throughout the city with marked differences in life expectancy between the most deprived and most affluent areas
- The city needs to develop high value businesses locally to retain higher skilled workers
- The city lacks affordable business accommodation
- There is evidence of the city developing a dual economy, with a high proportion of highly skilled jobs supported by a growing number of lower paid workers
- 8% of the working age population have no qualifications and educational attainment in secondary schools is below average
- The universities are growing along with the increasing requirements for student accommodation

2.2 Positive achievements include:

- An overall reduction in annual CO₂ tonnes per capita since 2005
- Levels of car ownership lower than national and regional averages
- Levels of travel to work by car lower than national and regional averages
- Year on year reduction of percentage of waste being disposed of at landfill
- The city contains a wealth of diverse designated wildlife sites of international, national and local significance
- The city includes areas of land falling within the South Downs National Park
- The city has an extremely attractive historic built environment including over 3400 listed buildings, 15 Scheduled Ancient Monuments, 6 Registered Parks and Gardens and 34 Conservation Areas.
- The city has one of the most highly qualified adult populations in the country, with 43% having a Level 4 (or equivalent) qualification
- The city contains the Regional Shopping Centre and contains significantly more shops compared to other city’s of similar size, including a strong reputation for specialist retailers

- The city is a regional centre for employment and is home to the biggest cluster of creative and digital technology industries in the south east outside London
- Housing delivery in the city is showing signs of recovery from the economic recession, with housing completions annually increasing since 2010/2011 although still not reflective of pre-recession rates.

The full baseline information can be found in Appendix B Submission City Plan Sustainability Appraisal Report.

Section 3 Areas of Particular Environmental Importance

3.1 There is one Special Area of Conservation (SAC) that falls partially within the administrative boundary of Brighton & Hove. There are three other SACs and one that is both a SAC and a Special Protected Area within 20km of Brighton & Hove.

3.2 The following table outlines the current issues and problems at these sites which are of relevance to the City Plan Part 1.

Site	Potential Issues and problems	Closest distance to BH (km)
Castle Hill SAC	Air pollution or inadequate grazing can lead to scrub encroachment. Leaching and spray drift from surrounding farmland.	Within boundary
Lewes Downs SAC	Air pollution can exacerbate scrub encroachment. Leaching and spray drift from surrounding farmland.	6
Ashdown Forest	Air pollution can exacerbate scrub encroachment. Increased water abstraction could result in drying out of the site. Recreational disturbance to the site.	19.5
Arun Valley	Increase in water demand resulting from increased population may alter hydrological regime.	20

3.3 A screening under the Habitats Regulations Assessment was most recently carried out on the City Plan Proposed Modifications 2014, which includes development within the urban fringe. The screening exercise discounted all possible impacts of the City Plan on European sites.

Section 4 Sustainability Appraisal Framework and Methodology

Sustainability Appraisal Framework

4.1 The review of the plans, policies and programmes that are relevant to the sustainable development of the Plan area identified key policy objectives which have to be taken into account by the City Plan. These policy objectives helped to inform the development of the Sustainability Appraisal Framework, which has then been used to test how the City Plan contributes to achieving sustainable development. The following Sustainability Appraisal Objectives make up the framework:

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.
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.
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes and their settings, townscapes, parks, buildings and archaeological sites effectively.
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.
5. To meet the essential need for decent housing, particularly affordable housing.
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.
7. Minimise the risk of pollution to water resources in all development.
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
9. To promote the sustainable development of land affected by contamination.
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
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.
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.
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.
14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
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.
16. To engage local communities into the planning process.
17. To make the best use of previously developed land.
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.
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
20. To encourage new developments to meet the high level Code for Sustainable Homes/BREEAM 'Excellent' standard.

- 21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and food stores.
- 22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

It is noted that Objective 20 is now somewhat out of date due to the March 2015 Written Ministerial Statement that confirms the winding down of the Code for Sustainable Homes. However, the reference to BREEAM is still applicable and therefore this part of the objective remains.

Methodology

4.2 This appraisal has used the Sustainability Appraisal Framework as set out above. The following scoring system has been used to show the likely impact.

4.3 Key

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

4.4 In the policy re-assessments, multiple symbols have been used to show significance.

Difficulties encountered

4.5 Some difficulties were encountered when undertaking the assessment. Data has been collected to show the conditions and potential trends of issues affecting Brighton & Hove. Some data sets can be more reliable than others, whereas others may be out of date and less reliable, making it difficult to quantify effects with certainty.

4.6 The assessment of significance is also difficult to quantify. Certain thresholds have been set by legislation, e.g. limits of air pollutants, which make it easier to assess significance, however these limits are not available for all indicators.

Section 5 Consideration of options

The Strategy and CP1 Housing Delivery - Consideration of Options

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

5.21 Spatial Strategy

Option 1: No change to Spatial Strategy

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

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

Option 2: Revised Spatial Strategy

Revised spatial strategy which:

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

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

5.23 CP1 – Housing Delivery

Options assessed at Proposed Modifications stage as follows:

Option 1: 13,200 dwellings

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

Option 2 – 24,000 dwellings

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

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

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

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

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

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

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

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

5.3 The option to meet the updated OAN, June 2015

- 5.31 At this stage, the need for the assessment of a further option which meets the updated OAN in full (30,120) has to be considered. Assuming that the 13,200 housing target is delivered as outlined in Option 1 above, which already includes the full SHLAA capacity, mixed use on some employment sites, estates regeneration, development within the urban fringe, again the only options to accommodate any additional housing are considered to be through the loss of existing employment land and loss of existing open space.
- 5.32 Based on a 50:50 split to achieve the net additional housing required (16,910 units) to meet the updated OAN the following would be required:
- 8,455 units to be delivered on sites currently in employment uses, and
 - 8,455 units to be delivered on sites currently in open space uses within the built up area.
- 5.33 Based on the density levels of 100dpa being achieved on employment sites and 50dpa achieved on open space the following loss would be required:
- 85ha of employment sites
 - 169ha of open space within the built up area.
- 5.34 In terms of loss of employment sites, 85ha would be the equivalent of losing 61% of employment sites (safeguarded sites and strategic allocations) in the city (see table below). In terms of loss of open space, 169ha would be the equivalent of losing 51% of open space (natural/semi natural, parks & gardens, outdoor sport and children's playspace) within the built up area (e.g. not including open space within the urban fringe or SDNP – see table below).
- 5.35 With reference to the conclusions of the SA of Option 2 at Proposed Modifications stage, to local evidence, namely the Employment Land Study and Open Space Study, both of which indicate a need to increase provision of both types of land, and in reference to various paragraphs of the NPPF which states there are three dimensions of sustainable development and that these roles should not be undertaken in isolation, it is not considered that to meet the updated OAN would be a reasonable option,

given the overall objectives of the City Plan, and has therefore not been subject to further assessment at this stage.

5.36 Explanation of Employment Land calculation:

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

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

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

5.37 Explanation of Open Space calculation:

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

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

- Natural & Semi Natural (total in BUA 125 ha)
- Parks & Gardens (total in BUA 145ha)
- Outdoor Sport (total in BUA 54ha)
- Children and young people (total in BUA 10ha)
- Total = 334ha within the built up area

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

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

Section 6 Screening Further Proposed Modifications

- 6.1 An initial screening exercise was carried out on all of the further proposed modifications to determine whether re-appraisal against the SA Framework was required. The screening process identified three main types of effects:
- No impact on any of the Sustainability Appraisal objectives, e.g. where modification is of an editorial nature or for clarification/information purposes, or where there is no change from the previous SA findings.
 - A minor positive or negative effect on one or more of the Sustainability Appraisal objectives, but does not change the previous SA findings.
 - A major positive or negative effect on one or more of the Sustainability Appraisal objectives, which results in a change to the previous SA findings and requires re-assessment.
- 6.2 In addition, although the changes to PM010 (The Strategy) and PM072 (CP1 Housing Delivery) are considered to be editorial and do not change policy text, in that they update the figure for the Objectively Assessed Need, these policies have been assessed again at this stage in order to ensure the SA assessment is placed in the current context.
- 6.3 The SA reassessed 4 policies in total, resulting from 8 Further Proposed Modifications. The remaining modifications were not found to have an impact on the previous SA findings as outlined in the table below.

Proposed Modification	Part of document / Policy	Further SA
PM003	Introduction and Overview	No
PM010	The Strategy	Yes
PM045	DA7 Toads Hole Valley	No
PM068	SA6 Sustainable Neighbourhoods	No
PM069	SA6 Sustainable Neighbourhoods	No
PM072	CP1 Housing Delivery	Yes
PM075	CP3 Employment Land	No
PM082	CP6 Visitor Accommodation,	No
PM117	CP7 Infrastructure and Developer Contributions	No
PM085	CP8 Sustainable Buildings	Yes
PM118	CP8 Sustainable Buildings	Yes
PM087	CP8 Sustainable Buildings	Yes
PM089	CP8 Sustainable Buildings	Yes
PM119	CP9 Sustainable Transport	No
PM120	CP12 Urban Design	No
PM121	CP15 Heritage	No
PM099	CP16 Open Space	No
PM102	CP17 Sports Provision	No
PM106	CP19 Housing Mix	No
PM122	CP20 Affordable Housing	Yes
PM123	CP20 Affordable Housing	Yes
PM108	CP21 Student Accommodation and HMOs	No

Section 7 Summary of Policy Re-assessments

- 7.1 This section sets out the sustainability implications of the further proposed modifications which were found to change the previous SA findings of:
- The Strategy
 - CP1 Housing Delivery
 - CP8 Sustainable Building Design
 - CP20 Affordable Housing

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

need for ongoing and proactive discussion under the Duty to Cooperate and it is noted that this is strongly referred to in the revised supporting text.

Environmental:

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

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

Economic:

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

CP8	<p><u>Impacts on SA objectives on water and energy use</u></p> <p>Water</p> <p>The removal of the requirement for residential development to meet Code for Sustainable Homes standards (previously Level 4 rising to Level 5 post 2016) is likely to have implications on water use. CSH4 required development to achieve 105l/p/day³; CSH5 required development to achieve 80l/p/day. The optional technical standard for water now included in the policy requires the achievement of a minimum 110l/p/day, which is a standard between CSH2 (120l) and CSH3/4 (105l). Locally, average water consumption in 2012/2013 was 132l/p/day, therefore achieving the new water standard should help to reduce average consumption, having a positive impact overall, however the saving in water consumption is unlikely to be as significant as previous requirements. It is recognised that the policy still requires development to aspire to water neutrality, however an aspiration may not be delivered in practice and it is difficult to know how this will be implemented in combination with the water standard.</p> <p>Energy: Allowable Solutions</p> <p>The exemption from Allowable Solutions has not yet been defined in government policy, however it is likely that small developments, i.e. those delivering less than 10 units, will be exempt from this part of the zero carbon homes standard. This means that these developments will only be required to meet the minimum energy efficiency standard, as set in Building Regulations. The 2015 Written Ministerial Statement⁴ indicates that this will be the equivalent of CSH4 and is equivalent to a 19% improvement on Part L Building Regulations. The previous iteration of the policy required all developments, regardless of size to reach CSH5, which would have meant a 100% improvement in energy/carbon performance on Part L Building Regulations or use of the financial offset mechanism 'Allowable Solutions' to contribute to carbon reduction offsite. This will have obvious implications on carbon emissions locally and the energy efficiency of new residential development, particularly when considering the amount of development that has come forward on smaller sites historically is high (55% between 2012-2014).</p> <p>The Brighton & Hove Renewable Energy Study 2012⁵ confirms that unless improvements to the energy efficiency of existing housing stock take place, the city will not meet its carbon reduction targets (19% of the carbon reduction target comes from retrofitting existing stock). The Allowable Solutions scheme is one possible mechanism for improving existing stock, however this does depend on how the scheme will be implemented which is currently not clear. The exemption of small sites could significantly reduce the amount of funding available for this purpose. It is recognised that large sites will still be required to meet the Allowable Solutions element of zero carbon homes, if they do not meet the standard on site, and that this could support future improvements in energy efficiency in the city, if government allow local schemes. However overall this exemption is likely to have an impact on the scale of improvements achieved, although this is very uncertain and will depend on how the Allowable Solutions scheme is implemented.</p>
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http://www.planningportal.gov.uk/uploads/code_for_sustainable_homes_techguide.pdf³

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

http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/BrightonandHove_Energy_Study_Jan2013.pdf⁵

Energy: Code for Sustainable Homes

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

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

Impacts on SA objectives for economic development

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

Impacts on SA objectives for housing and deprivation

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

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

	<p>poverty. The exemption from the Allowable Solutions scheme also has potential to have an indirect adverse impact on fuel poverty. This is due to the possible reduction in funding available through the Allowable Solutions scheme that could have been used to improve energy efficiency of existing building stock. There is a great deal of uncertainty around this however, which has led to an uncertain impact against this objective.</p> <p><u>Other environmental objectives</u> Other environmental objectives may be impacted since the CSH involves assessment and delivery of a variety of environmental issues and withdrawal of CSH is replaced only by standards for water and energy efficiency.</p> <p>The Code for Sustainable Homes requires scoring in various categories against various issues. Of these issues, some include mandatory minimum scores (see table below - identified with an 'M'), whilst other issues are 'tradable' and can be used to accumulate an overall score to achieve the relevant CSH Level. The impact of losing this assessment tool, which is externally audited and certified, delivering an evidenced assessment of standards at design stage and post construction, is hard to measure.</p> <p>Whilst Policy CP8 asks that these types of sustainability issue be addressed, by losing means of securing this, the ability of the policy to ensure delivery is somewhat compromised.</p>
CP20	<p><u>Impacts on SA Objectives for housing, health and deprivation</u> The assessment of the previous iteration of the policy found the impacts on housing and health to be significantly positive across all timescales, and positive for deprivation. The assessment of the amended policy still finds the impact on these objectives to be positive, but becomes less significant in the long term, as outlined below.</p> <p>According to the SHLAA 2014 (<i>see table below</i>), 604 units of housing are anticipated to come forward on sites delivering between 6-10 units of housing in the 2014-2030 period. This is equivalent to 5% of the total housing target for this period (11,120 units). If these sites had been delivered in accordance with the Submission policy CP20 requirements, this would have provided approximately 124 units of affordable housing (or as an equivalent financial contribution). This is equivalent to 3% of the total amount of affordable housing anticipated to have been delivered over this period (4,304 units) but is only 1% of the total amount of housing anticipated to come forward in the 2014-2030 period. This, in itself is therefore not considered to be a significant reduction.</p> <p>However the amendment to policy will also have an impact that is not as easy to quantify. Historically, a high proportion of housing in the city has been delivered on windfall sites delivering 9 or fewer units. This could, in part, have been caused by the "threshold effect" of the existing Local Plan policy requirements which requires affordable housing from schemes of more than 10 units, but could also be reflective of the size of sites available in the city. Between 2010-2014 19% of the housing delivered in the city was on sites of between 6-9 units (albeit not all windfall sites). If similar patterns of delivery</p>

continue to come forward on windfall sites then there could be a significant amount of housing delivered that will no longer be required to make any affordable housing contribution due to the proposed amendments to policy CP20.

The reduction in affordable housing resulting from this change to policy also needs to be considered against the local affordable housing need. The Assessment of Affordable Housing Need (2012) assessed this need as being 12,550 units in the 2012-2017 period, which includes a back-log of over 7,000 units. This is considered to be a significant need. The amended policy should result in 4,180 units of affordable housing (over the 2014-2030 period), and therefore only partially meets the local affordable housing need.

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

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

Impacts on SA Objectives for Economic Development and Employment

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

Section 8 Mitigation & Recommendations

The Strategy and CP1 Housing Delivery

- 8.1 The shortfall between the housing target (13,200) and the updated OAN (30,120) has increased to 56%. Although the plan will still deliver a minimum of 13,200 units, which is a significant increase in local housing stock, not meeting housing need will have implications and certain local issues such as affordability are likely to continue. No recommended changes are made at this stage, as the SA has previously assessed other options for housing delivery which were discounted as they were not considered to be balanced and sustainable.
- 8.2 In terms of mitigation, the shortfall further strengthens the need for ongoing proactive discussions with neighbouring authorities under the Duty to Cooperate obligation, which the SA recognises is referred to within the supporting text of policy CP1.

CP8 Sustainable Buildings and CP20 Affordable Housing

- 8.3 Some of the changes to these policies result in less positive impacts than previous iterations, however as the changes themselves reflect the direction of national policy they cannot be avoided. No recommendations have therefore been put forward for further changes to policies CP8 and CP20 at this stage.
- 8.4 It is noted that policy CP8 Sustainable Buildings was cited in the Submission City Plan as providing mitigation for various developmental policies, including the Development Area policies, as this policy in particular helped to ensure consumption of natural resources associated with the levels of development set out in the Plan would be minimised, along with mitigating various other impacts. The impact of losing the Code for Sustainable Homes assessment tool, which is externally audited and certified, delivering an evidenced assessment of standards at design stage and post construction, is hard to measure and whilst Policy CP8 still asks that various types of sustainability issue are addressed, by losing means of securing this, the ability of the policy to ensure delivery is somewhat compromised.

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

Section 9 Cumulative Impacts

- 9.1 As some of the appraisals have changed, the cumulative impacts have been re-assessed in order to ensure the impacts of the entire plan are considered together. The summary tables showing the cumulative impacts can be found in Appendix A.
- 9.2 The majority of the further proposed modifications have had no significant impact on the SA findings and are unlikely to affect the cumulative impacts of the City Plan.
- 9.3 The changes to CP8 Sustainable Buildings and CP20 Affordable Housing may have some cumulative impacts. It is possible that some housing on small sites may come forward more readily, due to the affordable housing contributions exemption, the reduction in energy and water standards required and the exemption from Allowable Solutions. This would have positive implications for market-housing and possibly economic growth.
- 9.4 However these exemptions are also likely to have some negative implications. The exemption from affordable housing contributions will result in a lower amount of affordable housing being delivered with this iteration of the Plan. The removal of the requirements for development to meet the Code for Sustainable Homes, combined with the future exemption from Allowable Solutions will have an impact on the consumption of natural resources, including energy and water, impacting on future carbon emissions, as well as having a range of other impacts and may impact on the ability of CP8 to be fully delivered. In particular, consumption of water and carbon emissions will be higher with this iteration of the Plan.
- 9.5 The changes to CP1 may have some further transboundary impacts due to the need to accommodate the city's unmet housing need and to help address issues associated with housing locally.
- 9.6 Overall, the cumulative impacts of the City Plan, as modified are as follows. Significant positive impacts are still considered to be:
- An increase in housing, including some affordable housing albeit at a level below the city's objectively assessed and affordable housing need, highlighting the ongoing need for discussions under the Duty to Co-operate.
 - An increase in the amount of land for employment uses, having economic benefits.
 - Overall improvements in the design, quality and sustainability of new development.
 - Improvements in access to services, through both increased provision and improvements in transport infrastructure
 - Delivery of many of the wider determinants of health, including housing and employment opportunities, although it is recognised that some existing social issues associated with under-supply of housing are likely to continue

Significant adverse impacts are still considered to be:

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

Section 10 Monitoring

- 10.1 No additional proposals for monitoring have been put forward at this time. The monitoring put forward in the Submission City Plan Part 1 SA (February 2013) and those in the Proposed Amendments SA (October 2014) are still applicable and are considered to address and cover a range of significant impacts.

Appendix A – Cumulative Impacts Tables

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

Table A1 Area based policies

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

Table A2 Citywide policies

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

Appendix B – Selection / Rejection of Alternatives

This section only includes the policies that have been re-assessed at this Further Proposed Modifications stage.

Stages:

I&O 2005 – Issues & Options

PO 2006 – Preferred Options

RPO 2008 – Revised Preferred Options

PAP 2009 – Policy Amendments Paper

SUB 2010 – Submission Core Strategy

POP 2011 – Policy Options Papers Stage – City Plan

DCP 2012 – Draft City Plan

SUB 2013 – Submission City Plan

PM 2014 – Proposed Modifications

FM 2015 – Further Matters – additional proposed modifications

Spatial Strategy		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Option A – An accessibility-led approach. Optimising development within the built up area by identifying areas based on their accessibility to sustainable travel.	I&O 2005	Selected. The SA found this option to have the greatest potential for reducing car use and improving air quality, and making employment opportunities more accessible, but that it could have other adverse impacts if applied in isolation, including loss of local distinctiveness, not making the best use of previously developed land and not taking into account whether development can be accommodated. Deprivation in less accessible locations may also increase.
Option B – A regeneration-led approach. Optimising development opportunities within the built up area by identifying areas of growth opportunity based on regeneration needs, including directing development to EB4U and Neighbourhood Renewal Areas.	I&O 2005	Rejected. This approach had some positive impacts including improving the health and employment opportunities for deprived communities. However, this approach could have adverse impacts on air quality and congestion, particularly in less accessible locations if sustainable transport was not improved, and that other areas of the city could suffer from economic deprivation. The SA concluded that the identified regeneration areas should be included within any preferred option, but that significant higher density development should not be permitted until social and employment issues had been addressed.

<p>Option C – An urban character / urban capacity-led approach. Based on the findings of studies which indicate the type and density of housing that could be accommodated within the urban areas of the city.</p>	<p>I&O 2005</p>	<p>Selected. This option was found to have positive impacts for biodiversity, preserving local distinctiveness, achieve better accessibility, enable economic development, improve community safety and make the best use of PDL. Some adverse impacts were identified including increasing pressure on existing infrastructure, and may not address specific health issues. The SA suggested that this approach should form part of the preferred option.</p>
<p>Option D – Limited development and expansion on the urban fringe. Still optimising development within the built up area but in addition to allow limited development on the urban fringe in the long term.</p>	<p>I&O 2005</p>	<p>Rejected. There were some positive impacts resulting from this option including the potential gains for enhancing visitor experiences to the SDNP, and the reduction in pressure within the built up area, particularly benefiting the historic built environment. More adverse impacts were identified including the likelihood for biodiversity losses and losses of leisure and open space. This option was also found to potentially increase in traffic congestion due to lack of accessible and sustainable transport and may not protect environmental resources. The SA concluded that it may be necessary to allow limited development on the urban fringe to relieve the carrying capacity of the city.</p>
<p>Option E – Identification of large strategic development sites. In addition to optimising development within the built up area, to allow for significant extensions to the Marina, the Harbour, or even a man-made island off-shore.</p>	<p>I&O 2005</p>	<p>Not assessed. This approach was not assessed by the SA as there were serious doubts over the deliverability of such an approach, and that this approach had limited potential.</p>
<p>Business as usual – continue with Local Plan.</p>	<p>I&O 2005</p>	<p>Rejected. Although there were many positives with continuing with the Local Plan approach, this approach was not found able to achieve the aims of spatial planning; it would not assist in the regeneration of deprived areas, it would not deliver the infrastructure required to accompany growth and may not supply the housing needed to meet needs and is reliant on windfall. The SA concluded that this approach was not a sustainable one in the long term.</p>
<p>Preferred Approach combining Option A and Option C: accessibility/urban character/urban capacity</p>	<p>PO 2006</p>	<p>The SA noted that the Spatial Strategy had taken on board recommendations to combine certain approaches and to consider strengthening regeneration areas by allowing some development to create more sustainable communities. The 10 broad areas were identified using these combined approaches and should</p>

approach and identifying 10 broad areas within the built-up area where significant mixed-use, high density development should be directed to.		therefore lead to overall positive impacts for maintaining local distinctiveness, supporting employment and economic development, improving health and reducing deprivation, whilst protecting the surrounding countryside.
Preferred Approach, based on PO 2008 Spatial Strategy, identifying 7 broad areas where significant mixed-use high density development should be directed within the built-up area. Some areas were removed from the Spatial Strategy due to limited potential for accommodate change; other areas were combined together to make a larger development; 2 new areas added.	RPO 2008	The SA re-considered Option E (Approaches to Growth) at this stage, due to emerging work put forward by SEEDA regarding the potential for Shoreham Harbour to accommodate significant development, and therefore resulted in Shoreham Harbour being included within the Spatial Strategy. The SA also re-considered Option D (Approaches to Growth), however the uncertainty over the extent of the urban fringe due to the SDNP inquiry at the time, along with the findings of the SHLAA and regeneration potential at Shoreham Harbour clarified the decision to continue to exclude the urban fringe from the spatial strategy. The impacts of the Spatial Strategy overall were considered to be similar to those outlined in PO 2006 above, with more specific area-impacts identified in each of the Development Area assessments.
Preferred Approach, mainly based on the RPO 2008 approach, by identifying 7 broad areas where significant mixed-use high density development should be directed. In addition, the Spatial Strategy allows for residential development within the urban fringe to be considered on a contingency basis.	PAP 2009	This change to the Spatial Strategy now includes Option D (from Options for Growth stage) of allowing limited development on the urban fringe in the long term in combination with the other Approaches to Growth that helped to identify the 7 Development Areas (Urban Capacity/Accessibility). The impacts of the change in the Spatial Strategy were considered under the assessment of SA4 (Urban Fringe policy) and were considered to be generally mixed and uncertain in the long term due to the contingency position,, particularly on the environmental objectives, but more positive towards housing. Overall, the Spatial Strategy should still result in impacts as described above, in terms of maintaining local distinctiveness, promoting employment and economic development, improving health and reducing deprivation.
Preferred Policy Approach, as set out under PAP 2009.	SUB 2010	Impacts as PAP 2009 above.
Preferred Approach. Spatial Strategy now consists of 8 Development Areas. 7 are	DCP 2012 / SUB 2013	Overall, impacts from the Spatial Strategy should be positive for maintaining local distinctiveness, housing, employment and economic development, health, safety, deprivation and accessibility. Despite being based on the accessibility approach, in

<p>carried forward from SUB 2010 stage and are located within the original built up area (based on the Urban Capacity/Accessibility Approaches). 1 new Development Area added consisting of a former urban fringe site which has been brought into the built up area. The contingency position for development within the urban fringe to take place in the long term has been removed. Spatial Strategy now also includes policy SS1 Presumption in Favour of Sustainable Development.</p>		<p>combination the Development Areas may have an adverse impact on air quality and transport, and will much depend on travel choices of the increased population. The removal of the contingency position removes some uncertainty associated with the position, and although the Spatial Strategy now includes a Development Area that was formerly located within the urban fringe, some of the impacts of development in this location are more certain due to it being an identified site. Other site specific adverse environmental impacts considered likely.</p> <p>Individual impacts from delivery of Development Area policies are considered in more detail in individual assessments.</p>
<p>Option 1 – based on SUB 2013 approach.</p>	<p>PM 2014</p>	<p>See impacts as described under SUB 2013 above. Option rejected due to the need to meet a greater housing need.</p>
<p>Option 2 (Preferred Approach) – based on SUB 2013 based on former Spatial Strategy approach of combining the accessibility and urban capacity approaches, maximising opportunities for brownfield development, but now includes the urban fringe as a broad source of potential for housing.</p>	<p>PM 2014 & FM 2015</p>	<p>The Spatial Strategy has positive impacts for employment and economic development through the creation of temporary jobs associated with house-building as well service-sector and other jobs to meet the needs of the increased population. Housing will be created to contribute towards the objectively assessed need, also being one of the wider determinants of health. The housing target is lower than the OAN and therefore some local social impacts may not be addressed, although will go further than former versions of the spatial strategy. There will be various environmental impacts, resulting from loss of open space in the urban fringe as well as development on PDL. Loss of some of the urban fringe open space sites will be a net loss against the city’s assessed quantity standards, thus increasing the pressure on remaining areas of open and will impact adversely against the standards for accessibility. Loss of open space on the urban fringe could also have adverse health impacts.</p> <p>Development throughout the city will increase the consumption of natural resources. and increase the likelihood of adverse transport-related impacts.</p>

CP1 Housing Delivery		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
AH1) Plan to provide new housing in accordance with the South East Plan target.	PO 2006	Selected. Although this option raised some uncertainty, as the housing target was unknown, and could therefore have adverse implications against some of the environmental objectives, that there would be significant positives for the social objectives.
CP11 Option 1) Outline the strategy for the planned location of new housing (in accordance with the South East Plan target of 570 homes annually), the mix of housing and to ensure proposals for residential development demonstrate how the additional demand for associated infrastructure and local services will be met.	RPO 2008	Selected. The development of new housing across the city raised several uncertainties and negativities towards some of the sustainability objectives, however to plan for housing needed was positive. No alternative option was put forward, as a “do nothing” option would not be acceptable as government guidance at that time set out specific requirements for the delivery of new housing within local planning authority areas.
Preferred Policy Approach, building on RPO 2008 Option 1, but allowing residential development on the urban fringe in the long term as a contingency basis.	PAP 2009	The policy has strong positive impacts for housing and health and positive impacts on some other objectives. The policy has mixed impacts on a range of environmental objectives. These mixed impacts are anticipated to become more adverse in the long term when development on the urban fringe takes place, e.g. on biodiversity, traffic, water pollution, adapting to climate change and accessibility.
Preferred Policy Approach, building on PAP 2009 and incorporating a site selection process for sites on the urban fringe.	SUB 2010	The policy has strong positive impacts for the social objectives, particularly health and housing, and positive impacts for employment and economic development. Adverse impacts are anticipated against a range of environmental objectives, which become more significant in the long term due to the release of sites on the urban fringe.
1) 9,800 new homes all within the built up area of the city.	POP 2011	Rejected. Option has positive impacts for housing but performed the least well against this objective compared to other options and was therefore not considered to be the best option.
2) 11,200 new homes mainly	POP 2011	Selected. Option performs positively against the housing, employment and economic

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

		positive impacts for reducing deprivation and impacts positively on health, with employment being one of the wider determinants of health. Loss of open space in the urban fringe is associated with various environmental impacts including possible impacts on biodiversity, landscape setting, water pollution, and climate change adaptation and would require mitigation. Loss of open space on the urban fringe could also have adverse health impacts, particularly relating to increasing health inequalities for deprived communities. Mitigation would be required.
Option 2 - meeting the OAN of 24,000 homes including, delivering 1,000 on the urban fringe; loss of 54ha of employment sites in the city and 108ha of open space from within the built up area.	PM 2014 (July)	Rejected. Option has strong positive impacts for housing. However this option would result in total loss of 39% of certain employment sites within the city and 32% of certain types of open space within the city, leading to significant irreversible adverse impacts including on the local economy and employment, but also the open space resource, biodiversity, increased transport, reduction in air quality, and most significantly on health and inequalities and would be permanent and irreversible.
Preferred Policy Approach based on SUB 2013 incorporating Option 1 (PM2 2014 Jul) stage which includes the urban fringe as a broad source of potential for housing with the potential for delivery of around 1,060 units of housing. 13,200 units of housing delivered in total, which also includes a greater allowance for windfall over the entire plan period.	PM 2014 (Jul)	Preferred Policy Approach. Policy impacts as described under Option 1 PM 2014. The policy will result in positive impacts for the economic objectives, adverse impacts for the environmental objectives and mixed impacts for the social objectives, including housing delivery, health and deprivation, but will go some way to addressing some of the housing related social issues. A range of adverse environmental impacts are anticipated which would require mitigation.
Preferred Policy Approach, based on SUB 2013 incorporating Option 1 (PM 2014 stage) which includes the urban fringe as a broad source of potential for housing with the	PM 2014 (Sep) FM 2015	Preferred Policy Approach. The policy will result in positive impacts for the economic objectives, adverse impacts for the environmental objectives and mixed impacts for the social objectives, including housing delivery, health and deprivation, due to the anticipated shortfall between the housing target and updated OAN but will go some way to addressing some of the housing related social issues. A range of adverse environmental impacts are anticipated which would require mitigation.

<p>potential for delivery of around 1,060 units of housing. 13,200 units of housing delivered in total. Reference to the site allocations process and the status of the Urban Fringe Assessment in the determination of planning applications included.</p>		
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CP8 Sustainable Buildings		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
PRE1) To require developments to achieve highest standards of sustainable building design.	PO 2006	Selected. This option was found to have positive impacts against the environmental objectives although it was recognised that there may be additional costs of meeting high standards.
CP1 Option 1) To require all new development to deliver levels of building standards in advance of those set out nationally in order to avoid expansion of the city's ecological footprint and to mitigate against climate change.	RPO 2008	Selected. This option was found to have positive impacts against all of the environmental objectives. It was found to have mixed impacts against the housing objective as could impact on the viability of building affordable homes.
CP1 Option 2) Business as usual.	RPO 2008	Rejected. This option could result in standards being applied that do not reflect the distinctive local circumstances. This was found to result in mixed impacts against some of the social and environmental objectives.
CP1 Preferred Policy Approach, building on RPO Option 1 above, and incorporating stronger wording that requires development to achieve certain standards.	SUB 2010	The policy has strong positive impacts on the objectives relating to biodiversity, water reduction, health, energy consumption and meeting high building standards. Other positive impacts also anticipated. Adverse impacts identified against the housing objective due to the conflict between building highly sustainable and affordable homes.
CP8 Preferred Policy Approach	DCP 2012	Impacts as described under SUB 2010 above.

building on SUB 2010 above.		
CP8 Preferred Policy approach, building on DCP 2012 however deferring the requirements of meeting higher standards to later on in the plan period.	SUB 2013	Impacts as described under SUB 2010/DCP 2012 above for the medium and long term, although less significantly positive against some objectives in the shorter term due to relaxation in standards required to be achieved. Adverse impacts still anticipated against the housing objective, however the policy allows viability of a scheme to be a consideration.
CP8 Preferred Policy Approach, building on SUB 2013, however reducing the environmental building standards required for residential development across all timescale and removing any difference for residential development on Greenfield sites to achieve higher standards than those on PDL. Further requirements added relating to development being required to reduce land pollution, and added protection for groundwater protection zones.	PM 2014	Impacts mainly as described under SUB 2013. Impacts considered to be significantly positive across relevant objectives, including those relating to water and energy minimisation, and meeting building standards despite the change in policy. Relaxation of building standards required to be achieved impacts positively on viability and the housing objective, which is a change from the previous position. Additional requirements relating to land pollution and protection of groundwater impact positively on relevant objectives.
Amended Policy Approach, removing references to Code for Sustainable Homes, replacing them with a standard for energy performance and water efficiency for residential development. Reference to the future exemption from Allowable Solutions added. Changes to bring policy in accordance with national policy.	FM 2015	Amended policy not as strong as previous version on some SA objectives, namely biodiversity (1), water minimisation (8) and energy consumption (18) in the long term due to removal of Code for Sustainable Homes standards and reference to the introduction of exemption from Allowable Solutions from small sites. The exemption from Allowable Solutions also impacts on the objective for reducing deprivation, making this more uncertain, due to the impact this could have on enabling the energy efficiency improvements on existing housing stock and subsequent reductions in fuel poverty. Conversely, the exemption from Allowable Solutions was found to have a minor positive impact on both the housing and economic development objective, which is an improvement from the previous iteration, although was considered to be fairly uncertain and will depend on implementation. All other impacts remain the same as the previous iteration including positive impacts on air pollution, reducing car journeys, minimising water pollution, promoting

		development of contaminated land, improving health, promoting development of previously developed land, meeting BREEAM, and reducing waste, however it is noted that implementing the policy may be compromised without the requirement to meet Code for Sustainable Homes and the quality assurance system this involved.
CP20 Affordable Housing		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
AH4) To increase the proportion of affordable housing required from new development.	PO 2006	Selected. Although this option will bring beneficial impacts relating to increasing affordable housing provision, it is noted that the amount delivered was unlikely to meet demand, resulting in an increasing shortfall of affordable housing.
CP 12 Option 1) To set out a plan wide target to secure an annual average of 230 units of affordable housing over the plan period from all mechanisms. Informed by an updated Viability Study, the council will negotiate with developers to secure up to a 40% element of affordable housing on all larger (10+) development sites with criteria set out to assess the proportion and type of affordable housing proposed informed by up to date assessments of local housing needs and site/neighbourhood characteristics.	RPO 2008	Selected. The SA concluded that option 1 would be the most sustainable as this would reflect the nature of housing sites available for housing in the city. This option has positive impacts against the objectives for housing, economic development, the health and deprivation objectives. Uncertainty was expressed as to whether the cost of providing affordable housing may conflict with the cost of providing sustainable homes.
CP 12 Option 2) To have a higher percentage target of	RPO 2008	Rejected. The SA concluded that option 2 would not be a viable option as the 2007 Affordable Housing Viability Study found that this would stretch viability too far and

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

evidence and studies.		
Amended policy approach, removing the requirement for 20% affordable housing contributions from schemes delivering between 5-9 units to be in accordance with national policy. The requirement for 30% from sites between 10-14 units is amended to only apply to sites delivering between 11-14 units. The 40% requirement from sites delivering over 15 units remains the same.	FM 2015	The policy will still seek to secure affordable housing, albeit on a smaller range of schemes than previous iterations. The policy was found to have strong positive impacts for housing and health in the short and medium term. However, the removal of the requirement for contributions from smaller schemes was found to have greater significance in the long term, as the need for affordable housing becomes greater over time (due to the amount required compared to the overall housing target and potential affordable likely to be delivered), resulting in a less significant positive impact in the long term. The policy is still anticipated to have positive impacts on employment, economic development, safety and deprivation and some other objectives. Some adverse environmental impacts are considered likely due to the delivery of development, which would require mitigation, considered to be met through implementation of other Plan policies.



**Brighton & Hove
City Council**

Brighton & Hove Submission City Plan Part One

Proposed Modifications

October 2014

Sustainability Appraisal Non-Technical Summary Addendum



Brighton & Hove
City Council

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Section 1 Introduction

Introduction

- 1.1 This report is the Non Technical Summary of the Sustainability Appraisal Addendum of the Proposed Modifications to Brighton & Hove City Plan Part 1.
- 1.2 The City Plan Part 1 is the first Development Plan Document (DPD) to be produced as part of a wider set of local planning policy documents. It contains 8 Development Area policies, 6 Special Area policies and 22 Citywide policies. Its purpose is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives.
- 1.3 The City Plan Part 1 was submitted in June 2013 and proceeded to Examination in Public during October 2013. In order to make the Plan sound, 116 Proposed Modifications have been made to the City Plan following the Examination in Public.
- 1.4 In order to ensure the likely effects of implementing the modified Plan to be assessed, documented and understood, the SA at this stage has also assessed the impacts of some of the Proposed Modifications against the Sustainability Appraisal Framework. In addition, the SA has re-tested the impacts of options for the Spatial Strategy and for housing delivery (policy CP1).
- 1.5 The Sustainability Appraisal Addendum does not repeat information provided at earlier stages, and should be read in conjunction with the Submission 2013 Sustainability Appraisal. Equally, this Non Technical Summary should be read alongside the Submission 2013 Non Technical Summary. It should be noted that this SA and Non Technical Summary (October 2014) supersedes those published in July 2014.

Links to other Plans and Programmes

- 1.6 In March 2012, the Government published the National Planning Policy Framework. This established the approach to achieving sustainable development and places importance of ensuring that Local Plan policies contribute to achieving sustainable development. The City Plan has been prepared in compliance with the NPPF. The City Plan has also been developed in accordance with the aims and objectives of numerous other plans and programmes, as has the Sustainability Appraisal Framework which tests the City Plan. A list of Plans, Programmes and Strategies that forms the basis for the Framework be found in [Annex 1 Sustainability Appraisal: Plans Programmes and Guidance](#).

Section 2 Key Characteristics and Sustainability Issues in Brighton & Hove

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

- The Ecological Footprint is higher than the regional and national average
- The need to continue to reduce carbon emissions from all sources
- Flood risk; including tidal, surface water and groundwater
- Air quality; NO₂ continuing to exceed the Air Quality Objective in central areas
- Congestion, noise and poor air quality resulting from transport particularly in central areas
- Groundwater quality (Brighton Chalk Aquifer) classified as “poor”
- The city is within a “highly water stressed” region with above regional average water consumption
- An additional 167ha of various types of open space will be needed by 2030 in order to maintain its quantity standards
- An increasing population, with an increase of population of over 10% in the period between 2001 and 2011 to 273,000.
- The city has the highest rate of over-crowding outside London
- The city’s housing remains largely unaffordable to the majority of its residents, with the average property costing over ten times the average income
- The annual affordable housing need is far greater than actual build levels
- The city is ranked as the 66th most deprived in England
- Health inequalities exist throughout the city with marked differences in life expectancy between the most deprived and most affluent areas
- The city needs to develop high value businesses locally to retain higher skilled workers
- The city lacks affordable business accommodation
- There is evidence of the city developing a dual economy, with a high proportion of highly skilled jobs supported by a growing number of lower paid workers
- 8% of the working age population have no qualifications and educational attainment in secondary schools is below average
- The universities are growing along with the increasing requirements for student accommodation

2.2 Positive achievements include:

- An overall reduction in annual CO₂ tonnes per capita since 2005
- Levels of car ownership lower than national and regional averages
- Levels of travel to work by car lower than national and regional averages
- Year on year reduction of percentage of waste being disposed of at landfill
- The city contains a wealth of diverse designated wildlife sites of international, national and local significance
- The city includes areas of land falling within the South Downs National Park
- The city has an extremely attractive historic built environment including over 3400 listed buildings, 15 Scheduled Ancient Monuments, 6 Registered Parks and Gardens and 34 Conservation Areas.
- The city has one of the most highly qualified adult populations in the country, with 43% having a Level 4 (or equivalent) qualification
- The city contains the Regional Shopping Centre and contains significantly more shops compared to other city’s of similar size, including a strong reputation for specialist retailers
- The city is a regional centre for employment and is home to the biggest cluster of creative and digital technology industries in the south east outside London

Section 3 Areas of Particular Environmental Importance

3.1 There is one Special Area of Conservation (SAC) that falls partially within the administrative boundary of Brighton & Hove. There are three other SACs and one that is both a SAC and a Special Protected Area within 20km of Brighton & Hove.

3.2 The following table outlines the current issues and problems at these sites which are of relevance to the City Plan Part 1.

Site	Potential Issues and problems	Closest distance to BH (km)
Castle Hill SAC	Air pollution or inadequate grazing can lead to scrub encroachment. Leaching and spray drift from surrounding farmland.	Within boundary
Lewes Downs SAC	Air pollution can exacerbate scrub encroachment. Leaching and spray drift from surrounding farmland.	6
Ashdown Forest	Air pollution can exacerbate scrub encroachment. Increased water abstraction could result in drying out of the site. Recreational disturbance to the site.	19.5
Arun Valley	Increase in water demand resulting from increased population may alter hydrological regime.	20

3.3 A screening under the Habitats Regulations Assessment has been carried out on the City Plan Proposed Modifications 2014, which includes development within the urban fringe. The screening exercise has discounted all possible impacts of the City Plan on European sites.

Section 4 Sustainability Appraisal Framework and Methodology

Sustainability Appraisal Framework

4.1 The review of the plans, policies and programmes that are relevant to the sustainable development of the Plan area identified key policy objectives which have to be taken into account by the City Plan. These policy objectives helped to inform the development of the Sustainability Appraisal Framework, which has then been used to test how the City Plan contributes to achieving sustainable development. The following Sustainability Appraisal Objectives make up the framework:

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.
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.
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes and their settings, townscapes, parks, buildings and archaeological sites effectively.
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.
5. To meet the essential need for decent housing, particularly affordable housing.
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.
7. Minimise the risk of pollution to water resources in all development.
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
9. To promote the sustainable development of land affected by contamination.
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
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.
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.
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.
14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
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.
16. To engage local communities into the planning process.
17. To make the best use of previously developed land.
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.
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
20. To encourage new developments to meet the high level Code for Sustainable Homes/BREEAM 'Excellent' standard.

21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and food stores.
22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

Methodology

- 4.2 This appraisal has used the Sustainability Appraisal Framework as set out above. The following scoring system has been used to show the likely impact.

Key

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

- 4.3 In the options assessments, multiple symbols, i.e. ++ have been used to differentiate between options.
- 4.4 In the policy re-assessments, multiple symbols have been used to show significance.

Difficulties encountered

- 4.5 Some difficulties were encountered when undertaking the assessment. Data has been collected to show the conditions and potential trends of issues affecting Brighton & Hove. Some data sets can be more reliable than others, whereas others may be out of date and less reliable, making it difficult to quantify effects with certainty.
- 4.6 The assessment of significance is also difficult to quantify. Certain thresholds have been set by legislation, e.g. limits of air pollutants, which make it easier to assess significance, however these limits are not available for all indicators.

Section 5 Assessment of Options

5.1 Options for the Spatial Strategy and Housing Delivery have been re-assessed at this stage, the results of which have fed into some of the Proposed Modifications. Options were assessed against the Sustainability Framework.

5.2 Spatial Strategy Assessment

5.21 **Issue:** the need to increase the housing target though revisions to the Spatial Strategy

5.22 Option 1: No change to Spatial Strategy

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

- Development directed to 8 Development Areas
- Spatial Strategy based on the initial options for growth (A) Accessibility Approach and (C) Urban Character Approach
- Spatial Strategy includes allocation of one strategic site formerly located within the urban fringe (Toads Hole Valley)
- No other identified development within the urban fringe
- 94% of dwellings delivered within built up area
- Housing target similar to that within the City Plan Part 1 (Submission version 11,200)

5.23 Option 2: Revised Spatial Strategy

Revised spatial strategy:

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

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

5.24 Summary of assessment and potential for mitigation

5.241 The Objectively Assessed Need for housing to 2030 is predicted to fall between 18,000-24,000 homes. Neither option meets the Objectively Assessed Need and therefore neither option will fully address some existing adverse social issues such as over-crowding and inaffordability, although it is recognised that there are much

wider contributing factors to these issues and the City Plan has a limited influence. Option 2 will result in an increase of housing stock of between 55% and 73% of the assessed need of between 18,000 to 24,000 units which is a significant increase in housing stock and is greater than that associated with Option 1, which will deliver between 47% and 62% of the assessed need. Option 2 therefore has greater potential for positive impacts than Option 1 against the housing objective and goes further to address the social dimension of sustainable development.

- 5.242 Both options will impact positively on employment and the economy. Option 2 has greater potential for positive impacts and goes further to address the economic dimension of sustainable development mainly due to the higher amount of house-building and construction related jobs created, and increased population which will increase the need for service sector and associated health and education jobs. Employment opportunities provided will also impact positively against objectives for health and deprivation.
- 5.243 Both options are likely to result in some adverse environmental impacts. In relation to resource consumption and production of waste, the impacts of the higher population associated with Option 2 are not likely to be significantly different to the impacts associated with Option 1 when put into context of size of the wider population. Impacts are likely to be mitigated through the requirement for new residential development to meet higher environmental standards.
- 5.244 Both options are likely to result in adverse transport-related impacts from delivery of housing throughout all areas of the city and the increase in population, which will require mitigation and intervention. There is likely to be some additional site specific impacts associated with housing on the urban fringe, due to the current limited availability of sustainable transport options in that location. Overall there is not considered to be a significant difference between the level of impact between the two options, as although option 2 will potentially result in more journeys locally due to the increased population and some more localised urban fringe impacts, it may result in lower levels of in-commuting than option 1 as there will be a greater population that is known to be required to meet forecasted economic growth.
- 5.245 Both options are likely to result in other site-specific environmental impacts, although the adverse impacts associated with Option 2 are considered to be of more significant than with Option 1 due to the additional development on 31ha of the urban fringe. This includes potential impacts on biodiversity, landscape, surface water flood risk, and climate change adaptation. With reference to the Urban Fringe Assessment (2014), it is understood that only sites, or parts of sites, where the impacts can be mitigated to an acceptable have been identified as having potential for residential development, and provided that the mitigation set out in the Assessment is implemented, then these adverse impacts should be minimised.
- 5.246 The adverse social impacts associated with loss of open space on the urban fringe, such as the impacts on health and deprivation may not be able to be mitigated to an acceptable level, with it being recognised that close access to open space benefits the health of everyone, but particularly benefits the health of the least well off the most. It will be essential to ensure that urban fringe sites without development potential are protected and access to them and to the adjacent SDNP is improved in order to minimise any potential health issues on surrounding communities.

5.247 Overall, Option 2 has greater potential for adverse impacts on the majority of environmental objectives. Those that are of more significance are related to the distribution of development, particularly that which is located within the urban fringe, rather than the increased amount of development and would require mitigation. However, Option 2 has greater potential for more significant positive social and economic impacts related to the increased amount of housing delivered, and is considered to go further to address the social and economic dimensions of sustainable development. **Option 2 is therefore considered to be the preferred option provided that the impacts of development on the urban fringe, as well as elsewhere, can be mitigated to an acceptable level.**

5.3 Housing Delivery

5.31 Issue: meeting the increasing need for new housing.

The Objectively Assessed Need is anticipated to fall within a range of 18,000 to 24,000 dwellings¹.

5.32 Option 1: 13,210 dwellings

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

5.33 Option 2 – 24,000 dwellings

- 13,210 as described in option 1
- 5,395 dwellings from loss of 54 ha (39%) of employment sites²
- 5,395 dwellings from loss of 108 ha (32%) of open space within the built up area³

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

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

¹ Sussex Coast Assessment of Housing Development Needs (May 2014)

² 54ha equivalent of 39% of “available” employment land in the city. (“Available” = 139ha made up of: 42ha of safeguarded sites (CP3) and 97ha of strategic allocations (Development Area policies)

³ 108ha equivalent to 32% of “available” open space within the built up area, e.g. not including open space within the urban fringe or the South Downs National Park. (“Available” = 334ha made up of the following: 125ha Natural/Semi-natural, 145ha Parks & Gardens, 54ha Outdoor Sports, and 10ha Children & Young People)

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

5.34 Conclusion and potential for mitigation

5.341 Option 1 will result in an increase of housing stock of between 55% and 73% of the assessed need which is a significant increase in housing stock. However, Option 1 does not meet the Objectively Assessed Need (OAN) for housing in full, which could mean that some existing adverse social issues such as over-crowding and inaffordability are not addressed and continue. Option 2 meets the top end of the range of OAN (18,000-24,000) therefore has greater potential for positive impacts than Option 1 against the SA objective for housing and may help address some local housing-related issues.

5.342 Option 1 has greater potential for positive impacts on the employment and economic development objectives than Option 2. Although Option 2 results in greater levels of house-building, which should lead to economic growth, Option 2 is found likely to result in significant adverse impacts for the local economy, due to job losses, business re-location, reduced inward investment and the shortfall in business premises, all leading to a constrained local economy resulting from the 39% loss of employment land to residential uses. Option 2 will also adversely impact on the local population's health due to reduced employment opportunities and potentially increase income/employment-based deprivation levels. These impacts are considered to be permanent, irreversible, increasing in the long term and are unable to be mitigated against.

5.343 Both options will result in losses of open space on the urban fringe, with potential for various environmental impacts. With reference to the Urban Fringe Assessment (2014), it is considered that some of the environmental impacts associated with loss of open space in this location can be minimised or mitigated to an acceptable level, i.e. those related to biodiversity, landscape, surface water flood risk, and climate change adaptation. Loss of open space within the built up area could also result in similar adverse environmental impacts, and it is likely that these could also be mitigated to an acceptable level.

5.344 In addition to the environmental impacts, the combined loss of 7.5% of open space on the urban fringe and 32% of open space within the built up area associated with Option 2 could have adverse health impacts, particularly relating to increasing health inequalities for deprived communities, where health issues associated with inactivity and lack of access to open space are more prevalent.

5.345 The impacts of loss of open space as a resource within the urban fringe could more readily be mitigated by existing provision within the SDNP due to its proximity, although the risk for social impacts identified above remains. However, it is

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

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

Section 6 Screening Proposed Modifications

- 6.1 An initial screening exercise was carried out on all of the proposed modifications to determine whether re-appraisal against the SA Framework was required. The screening process identified three main types of effects:
- No impact on any of the Sustainability Appraisal objectives, e.g. where modification is of an editorial nature or for clarification/information purposes, or where there is no change from the previous SA findings.
 - A minor positive or negative effect on one or more of the Sustainability Appraisal objectives, but does not change the previous SA findings.
 - A major positive or negative effect on one or more of the Sustainability Appraisal objectives, which results in a change to the previous SA findings and requires re-assessment.
- 6.2 The SA reassessed 18 policies in total, resulting from 31 Proposed Modifications. The remaining modifications were not found to have an impact on the previous SA findings. The Proposed Modifications for 13 policies had a major positive or negative effect and a full re-appraisal of that policy against the Sustainability Appraisal Framework has taken place. In addition, there were 5 policies whereby the SA was revised to ensure it reflects the most up to date version of the policy, even though the screening exercise found that the changes were unlikely to cause any significant changes. The policies affected by the Proposed Modifications are set out below.
- 6.3 Five policies which underwent appraisal were specifically related to modifications regarding the potential for housing on the urban fringe as follows:
- Spatial Strategy
 - SA4 Urban Fringe
 - CP1 Housing Delivery
 - CP16 Open Space
 - CP17 Sports and Recreation
- 6.4 Eight policies were re-assessed due to a major positive or negative change resulting from other modifications as follows:
- DA2 Brighton Marina
 - DA3 Lewes Road
 - DA5 Edward Street and Eastern Road
 - DA7 Toads Hole Valley
 - DA8 Shoreham Harbour
 - SA5 The Setting of the South Downs National Park
 - CP3 Employment Land
 - CP8 Sustainable Buildings
- 6.5 The following five policies were reassessed to ensure the SA reflected the most up to date version of the policy:
- DA1 Brighton Centre and Churchill Square
 - DA4 London Road and New England Quarter
 - DA6 Hove Station
 - SA1 The Seafront
 - SA2 Central Brighton

Section 7 Assessment of modifications resulting in a change to the SA

7.1 This section sets out the sustainability implications of the proposed modifications which were found to change the previous SA findings of:

- Policies related to the urban fringe modifications (5 policies)
- Policies not related to the urban fringe modifications (8 policies)

7.2 Policies related to the urban fringe modifications

Policy	Proposed Mod number	Summary of Key Changes to Sustainability Appraisal
Spatial Strategy	PM010	<ul style="list-style-type: none"> • The modifications direct the majority of development to brownfield sites within the built up area but identify the urban fringe as a broad source of potential. • The modifications strengthen the strategy in relation to meeting local housing needs and this has positive implications for SA objective (5) housing, although impacts for housing are considered to be mixed, due to the % of the OAN to be achieved. • Mixed impacts are also considered to result for other social objectives including health (13) and deprivation (15). • The modifications are considered to potentially result in adverse impacts against the objectives 1 (biodiversity), 3 (local distinctiveness/open space), 4 (SDNP), 7 (water pollution/flood risk), 19 (climate change adaptation) and 21 (accessibility).
SA4 The Urban Fringe	PM064	<ul style="list-style-type: none"> • The modifications provide more certainty with regards to delivery of housing in the urban fringe, either through site allocations in the City Plan Part 2, or prior to Part 2 and this is considered to have a positive impact on the SA objective (5) housing. • The potential for housing in the urban fringe location impacts adversely on a range of other objectives. In conjunction with other policy requirements the following impacts are now considered to be mixed: objective 1 (biodiversity), 3 (local distinctiveness/open space), 4 (SDNP), 6 (reducing car journeys) 7 (water pollution/flood risk), 13 (health), 15 (deprivation), 19 (climate change adaptation) and 21 (accessibility). • Overall the main thrust of the policy is still considered to be the protection and enhancement of the urban fringe and specifically the policy will not allow development in this location unless any adverse impacts are minimised, mitigated and/or compensated for. The modification is therefore not considered to outweigh the positive aspirations of the policy, and instead results in mixed impacts on environmental objectives as described.
CP1 Housing Delivery	PM072	<ul style="list-style-type: none"> • These modifications increase the housing target, refer to the updated and increased Objectively Assessed Need and indicate the anticipated distribution of housing which includes a greater allowance for windfall over the plan period and

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

Policy	Proposed Mod number	Summary of Key Changes to Sustainability Appraisal
		objectives due to the limited extent of the potential loss, although this may become more significant in the long term.

7.21 Summary of combined effects of policies: SS, SA4, CP1, CP16, and CP17

7.211 Economic impacts:

Overall, the policies should result in positive impacts relating to employment and economic development. This is due to the intrinsic link between house-building, employment opportunities and economic growth and includes temporary jobs created through house-building as well as service-sector, health and education jobs to meet the needs of the increased population. Employment opportunities may result in other positive impacts such as a reduction in deprivation and also impacts positively on health, with employment being one of the wider determinants of health.

7.212 Social impacts:

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

7.213 Environmental impacts:

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

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

The policies will increase the likelihood of adverse transport-related impacts, due to the increased population, cars owned and journeys made. It is recognised that development within the built up area which is more accessible could impact positively upon choices around car ownership and travel mode, whereas development in the urban fringe may result in a more car-dominated environment and an increase in localised traffic and associated issues, due to its location and the amount of sustainable transport services currently available there. Some in-commuting may also be associated with the housing target. Resource consumption, including water and energy is likely to increase with a larger population, as will waste generation.

See Section 9 for mitigation.

7.3 Other modifications that resulted in a change to the SA

7.31 The following table summarises the sustainability appraisal implications of the remaining proposed modifications that were found to change the previous SA findings.

Policy	Proposed Mod Number	Summary of Changes to Sustainability Appraisal
DA2 Brighton Marina	PM020 PM022	<ul style="list-style-type: none"> This modification enables viability and deliverability to be considered as grounds for not meeting the requirements of policy point 12: delivery of sustainable energy technologies. This is considered to make the impact more uncertain against SA Objective 18 (maximise sustainable energy use) and change the score from positive, to positive uncertain.
DA2 Brighton Marina	PM019	<ul style="list-style-type: none"> This modification removes the restriction that required development proposals to be lower than cliff height. This is considered to make the impact uncertain against SA Objective 3 (maintaining local distinctiveness) and change it from mixed positive/negative to negative uncertain; and Objective 4 (protecting the South Downs National Park) changing the score from positive to uncertain.
DA3 Lewes Road	PM026	<ul style="list-style-type: none"> This modification amends the quantum of housing to be delivered throughout the development area. Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA3 has been updated to ensure it reflects the quantum proposed in the final policy.
DA3 Lewes Road	PM027	<ul style="list-style-type: none"> These modifications remove the ambition to deliver a zero carbon development on the Preston Barracks and Falmer Released Land sites. Although the screening exercise found this modification alone to not significantly change the score, due to other policy requirements, the review of the SA presents the opportunity to amend any explanatory text.
DA3 Lewes Road	PM028	<ul style="list-style-type: none"> This modification removes the requirement to meet BREEAM outstanding on one of the Strategic Allocations. The policy is now considered to have a negative impact against SA Objective 20 (meeting BREEAM standards).
DA3 Lewes Road	PM025	<ul style="list-style-type: none"> These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. The SA for DA3 has been updated to ensure it

Policy	Proposed Mod Number	Summary of Changes to Sustainability Appraisal
		reflects the new AQMA designation and refer to the new policy requirements.
DA5 Edward Road and Eastern Street	PM038	<ul style="list-style-type: none"> • This modification amends the quantum of housing to be delivered throughout the development area. • Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA5 has been updated to ensure it reflects the quantum proposed in the final policy.
DA5 Edward Road and Eastern Street	PM041	<ul style="list-style-type: none"> • This modification clarifies that the residential element of the Freshfield Road Business Park and Gala Bingo Hall Strategic Allocation is likely to come forward in the earlier part of the plan period, and that the employment element will come forward in the later part of the plan period. • This is considered to improve the short term score against the SA Objective 5 (housing).
DA7 Toads Hole Valley	PM045	<p>Numerous modifications:</p> <ul style="list-style-type: none"> • The modification which removes the requirement to deliver 25,000sqm employment floorspace, replaced by the requirement to reserve a site area for employment purposes is considered to weaken the score against SA objectives 11 and 12 (employment and economic development) and is considered to change the scores from significantly positive to positive. • The modifications which change the requirements relating to sustainable energy infrastructure are considered to make the score against SA objective 18 (maximise sustainable use) more uncertain, and changes the score from positive to positive/uncertain. • The modification that removes the specific sustainable building requirements is considered to weaken the score against SA objective 20 (meet BREEAM/CSH) and changes the score from significantly positive to positive. • The modifications around policy text: “seeks to enhance links to the SDNP” and “provide contributions towards improved pedestrian and cycle links” and “provide contributions towards links to existing parks” all impact on access to/from the site. This is not considered to impact on any scores, however may have some health and/or equalities implications, as described in the HEQIA.
DA8 Shoreham Harbour	PM047	<ul style="list-style-type: none"> • This modification clarifies that one of the aims for the Harbour is to support large scale zero and low carbon energy technologies. • This has significant positive impacts against SA objective 18 (maximise sustainable energy use) in

Policy	Proposed Mod Number	Summary of Changes to Sustainability Appraisal
		the longer term.
DA8 Shoreham Harbour	PM051 PM052	<ul style="list-style-type: none"> • These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. • The SA for DA8 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.
SA5 The Setting of the South Downs National Park	PM065	<ul style="list-style-type: none"> • This policy has changed significantly and is now found to have less significant positive impact on some objectives (biodiversity and water pollution) as many of the former policy requirements are now located within the supporting text where they carry less weight. • This is not considered to be negative and reflects the fact that planning decisions are taken by the South Downs National Park Authority. • The main thrust of the policy is still to ensure maximum protection of the SDNP and its setting.
CP3 Employment Land	PM075	<ul style="list-style-type: none"> • The modification allows waste management facilities to be developed on industrial estates. • This has positive impacts against SA Objective 22 (reduction of waste)
CP8 Sustainable Buildings	PM085	<ul style="list-style-type: none"> • This modification reduces the standards that need to be achieved across all timescale. • The impacts on objective 8 (water minimisation), objective 18 (energy reduction) and objective 20 (environmental standards) are still considered to be positive as the standards required will still require significant reductions in water and energy consumption. • The policy is now found to have negligible impacts against SA objective 5 (housing) as the reduction in standards potentially makes residential development more viable and reduces the likelihood of adverse impact against this objective.
CP8 Sustainable Buildings	PM086	<ul style="list-style-type: none"> • This modification requires development to reduce land pollution and to ensure water supply is safeguarded if development is within a groundwater source protection zone. • The policy is now found to have positive impacts against the SA Objective 9 (development of contaminated land). • The policy is now found to have significant positive impacts against the SA objective 7 (minimise pollution of water).

Section 8 Assessment of other modifications

8.1 The following table lists the proposed modifications which did not have any impact on the SA findings, but where the policy has been re-assessed to incorporate the change to policy.

Policy	PM Number	Summary of Changes to Sustainability Appraisal
DA1 Brighton Centre and Churchill Square	PM014	<ul style="list-style-type: none"> • These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. • The SA for DA1 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.
DA4 – New England Quarter and London Road	PM034	<ul style="list-style-type: none"> • This modification amends the quantum of housing to be delivered throughout the development area. • Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA4 has been updated to ensure it reflects the quantum proposed in the final policy.
DA4 – New England Quarter and London Road	PM033	<ul style="list-style-type: none"> • These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. • The SA for DA4 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.
DA6 – Hove Station Area	PM043	<ul style="list-style-type: none"> • This modification amends the quantum of housing to be delivered throughout the development area. • Although this modification is not considered to significantly change any of the previous SA findings, the SA for DA6 has been updated to ensure it reflects the quantum proposed in the final policy.
DA6 – Hove Station Area	PM044	<ul style="list-style-type: none"> • These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. • The SA for DA6 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.
SA1 The Seafront	PM056	<ul style="list-style-type: none"> • This modification adds the wording “minimum” to the 400 homes to be delivered. • This adds a certain degree of uncertainty across various objectives associated with the impacts (positive or adverse) associated with the delivery of this development. • The explanatory text to objectives 2 (air quality), 3 (local distinctiveness), 5 (housing), 6 (car journeys), and 8 (minimise water use), is amended to reflect that the

Policy	PM Number	Summary of Changes to Sustainability Appraisal
		housing target is a minimum, and that therefore the positive and negative impacts could be greater.
SA1 The Seafront	PM058	<ul style="list-style-type: none"> • This modification relating to air quality is considered to be of an editorial nature, however the SA for SA1 has been updated to ensure it reflects the new AQMA designation.
SA2 Central Brighton	PM061	<ul style="list-style-type: none"> • These modifications are considered to strengthen the policy in relation to seeking air quality improvements or mitigation, however they are not considered to significantly change the previous SA findings. • The SA for SA2 has been updated to ensure it reflects the new AQMA designation and refer to the new policy requirements.

Section 9 Mitigation and Recommendations

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

9.2 List of mitigation

9.3 Spatial Strategy, SA4, CP1 and CP16

Mitigation for development on urban fringe sites:

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

9.4 DA2 Brighton Marina

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

9.5 DA3 Lewes Road

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

9.6 DA7 Toads Hole Valley

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

9.7 CP3 Employment Land

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

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

9.8 Recommendations

9.81 The following table lists the recommendations that have arisen from the Sustainability Appraisal process at this stage.

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

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

Section 10 Cumulative Impacts

- 10.1 As some of the sustainability implications for certain policies have changed as a result of the proposed modifications, the cumulative impacts have been re-assessed in order to ensure the impacts of the entire plan are considered together. The summary tables showing the cumulative impacts across all policies can be found in Appendix A.
- 10.2 Overall, although some of the appraisals have changed, with several having greater potential for adverse or uncertain impacts than previous iterations, the cumulative impacts arising from implementation of the submission City Plan Part 1 (with proposed modifications) overall are not considered to be significantly different to those identified at submission stage. In addition, adequate provision for mitigation through implementation of policies is still considered to be in place.
- 10.3 Potential significant adverse impacts are still considered to be as follows:
- increase in traffic congestion and associated impacts including air quality, noise and carbon emissions, with this being particularly problematic in central areas and in the morning peak-time.
 - increase in pressure between competing land uses, resulting in increased loss of Greenfield sites, some of which perform an open space function, and associated impacts including visual impacts, and other environmental impacts such as flood risk and climate change adaptation
 - increased consumption of natural resources, particularly water and the impacts of this on the Brighton Chalk Aquifer
 - increased pressure on local amenities, particularly open space, which will become more significant as the population increases
- 10.4 Potential significant positive impacts are still considered to be as follows:
- a significant increase in affordable and non-affordable housing, albeit at a level below the city's objectively assessed need
 - increase in amount of land for various employment uses, having economic benefits
 - improvements in design, quality and sustainability of new development
 - improvements in access to services, through both increased provision and improved transport infrastructure
 - delivery of many of the wider determinants of health, including housing and employment opportunities

Section 11 Monitoring

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

12. Conclusion

- 12.1 The vast majority of the proposed modifications have had little or no impact on the Sustainability Appraisal. Those that had an impact have resulted in a variety of changes. Some policy requirements have been strengthened against certain sustainability objectives, such the Development Area requirements relating to air quality improvements, or are now more positive, such as the Sustainable Buildings policy requirements relating to reducing land and water pollution. However some are now found to be less strong such as the removal of the requirements to meet certain sustainability standards in the Development Area policies, or now have greater risk of negative impact against certain sustainability objectives, such as the policies that are linked to the potential for housing in the urban fringe location.
- 12.2 The group of policies that resulted in the most significant changes to the previous SA findings are those related to the potential for housing development on the urban fringe, and in particular policy SA4 The Urban Fringe. Although the main thrust of this policy is still protection and enhancement of the urban fringe, the policy in conjunction with the Urban Fringe Assessment Study indicates that housing is likely to come forward in this location. Whilst this brings about positive impacts for the SA Objective for housing, as well as economic and employment benefits, it also brings about potential for adverse impacts across a range of objectives, which will require mitigation in order to make the social gains acceptable.
- 12.3 When all the modified policies are looked at cumulatively alongside the remaining policies within the City Plan, no new significant impacts have been identified that were not already identified by the Submission City Plan Sustainability Appraisal. The adverse impacts include the potential for increased traffic congestion particularly in the morning peak-time having associated impacts, increased pressure between competing land uses resulting in an increasing loss of Greenfield sites which perform various functions, increased consumption of natural resources, and increased pressure on local amenities, particularly open space. The positive outcomes include a significant increase in housing which is greater than previous versions of the Plan, an increase in employment opportunities and economic benefits, improvements in the design, quality and sustainability of new development, and delivery of many of the wider determinants of health.
- 12.4 The City Plan is considered to make an important contribution to achieving sustainable development in the city; through prioritising development in certain locations, through the delivery of development to help meet local needs, and through the various requirements that need to be met by new developments. The City Plan seeks to balance the competing requirements of the city in a way that protects the majority of the natural environment and historic built environment whilst meeting some of the development and other needs of an increasing population. It is recognised that ongoing liaison with neighbouring authorities under the Duty to Cooperate will be required in order to ensure local needs are met. The City Plan includes the range of policies required to ensure that positive outcomes from development are achieved and although there are some inevitable uncertainties and potential for adverse impacts, monitoring is in place to ensure these impacts are measured.

Appendix A Cumulative Impacts Tables

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

Area based policies

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

Citywide policies

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



**Brighton & Hove
City Council**

Proposed Submission City Plan Part One

Brighton & Hove City Council's Local Development Framework

February 2013

Sustainability Appraisal – Non Technical Summary



**Brighton & Hove
City Council**

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1.0 Introduction

- 1.01 This report is a summary of the Sustainability Appraisal Report that incorporates Strategic Environmental Assessment of Brighton & Hove's City Plan Part 1 Proposed Submission.
- 1.02 The City Plan Part 1 is the first Development Plan Document (DPD) to be produced as part of a wider set of local planning policy documents known as the Brighton & Hove's Local Development Framework. Its purpose is to provide the overall strategic and spatial vision for the future of Brighton & Hove through to 2030. It will help shape the future of the city and plays an important role in ensuring that other citywide plans and strategies achieve their objectives.
- 1.03 The City Plan Part 1 sets out how the council will respond to local priorities; how it will meet the social, economic and environmental challenges that face the city; and how it will work with partners to reduce inequalities. It identifies the broad locations, scale and type of development and supporting infrastructure that will take place in the city. The City Plan also responds to, and provides for, the needs of a growing population and a growing local economy and reflects the role and importance of the city in the sub region and the south east.
- 1.04 This Non-technical Summary provides a summary of the stages of Sustainability Appraisal undertaken so far, a brief overview of key sustainability issues facing the city, and a summary of the findings of the Sustainability Appraisal assessment of the City Plan Part 1 policies, that have been amended since the previous iteration was produced in May 2012. Detailed findings, along with a full list of plans, policies and programmes that have influenced development of the policies and the Sustainable Appraisal Objectives, along with the baseline information and consultation responses can be found in the full Sustainability Appraisal Report.

1.1 What are Sustainability Appraisal and Strategic Environmental Assessment?

- 1.11 The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal for all Development Plan Documents. As the City Plan Part 1 is subject to preparation and adoption by a local authority, determines the use of a small area at local level and is likely to have a significant effect on the environment, a Strategic Environmental Assessment, in accordance with European Directive EC/2001/42, is also required. The National Planning Policy Framework also requires that a Sustainability Appraisal, incorporating the requirements of the SEA Directive, is integral to the plan making process.
- 1.12 The combined SEA/SA process aims to ensure that likely significant sustainability effects arising are identified, assessed, mitigated and monitored. Findings from the SEA/SA have been incorporated and integrated into the development of the policies.

2.0 Methodology

- 2.01 The SA Report has been prepared by officers from the council's Planning Strategy and Projects Team. The SA process is underpinned by the requirements of the EU Strategic Environmental Assessment Directive and the approach adopted for the report follows guidance produced by the Planning Advisory Service in the on-line Plan Making Manual and Sustainability Appraisal pages, and the Government's 'Practical Guide to the Strategic Environmental Assessment Directive' 2005. Guidance set out in the Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (2005) has also been applied as although now superseded, provides a good basis and a well understood methodology for carrying out Sustainability Appraisal. The following stages have been undertaken at various stages of the DPD's development.
- 2.02 Stage A – Setting the context and objectives, establishing the baseline and deciding on the scope.
- 2.03 Stage B – Developing and refining the options and testing the effects.
- 2.04 Stage C – Production of Sustainability Appraisal Report
- 2.05 Stage D – Consultation on the Sustainability Appraisal Report
- 2.06 Stage E – involves monitoring and implementation and will be carried out once the City Plan Part 1 is adopted.
- 2.06 At each of the stages above, the associated requirements set out in points (a) to (j) in Annex 1 of the Strategic Environmental Assessment Directive have also been carried out.

3.0 Stages of development of the City Plan and Sustainability Appraisal

3.1 Core Strategy: Issues & Options – October 2005

3.11 The 'Issues and Options' document set out five possible broad approaches to accommodating the predicted development of the city over the next 20 years. In summary, the five approaches were:

- A - Accessibility-led approach
- B - Regeneration-led approach
- C - Urban character /urban capacity-led approach
- D - Limited development and expansion on the urban fringe
- E - identification of large strategic development sites

3.12 Following consultation on the Issues & Options document, the first four approaches to growth were considered to be the most viable. In addition, possible options for each issue were developed, followed by preferred options.

3.13 The Sustainability Appraisal Scoping Report was circulated at Issues & Options stage.

3.2 Core Strategy: Preferred Options – November 2006

3.21 This set out the preferred options for:

- 1) Approaches to accommodating growth, as described above under A-E. It also set out the preferred options for directing significant mixed-use, high density development to 10 areas within the city.
- 2) Policies to support the implementation of the spatial strategy (growth approaches). These were set out under the themes of the revised Community Strategy.
- 3) A number of major cross-theme projects and areas.

3.22 The four approaches to growth, along with a business as usual approach, were appraised by the SA objectives. In addition, options were developed for each of the themes of the Community Strategy as described in (2) above, based on findings from consultation as well as baseline studies. The options, along with a business as usual approach underwent assessment against the Sustainability Appraisal Framework.

3.23 The Sustainability Appraisal of the Preferred Options was circulated at this stage.

3.3 Core Strategy: Revised Preferred Options – June 2008

3.31 A number of matters arose following the Preferred Options 2006 stage which required a change of approach to the Preferred Strategy, therefore a Revised Preferred Options stage was carried out.

3.32 The Core Strategy Revised Preferred Options identified broad locations for development (the Spatial Strategy) and addressed city wide matters through the Core Policies.

3.33 A range of options for each of the spatial strategy policies and core policies were subject to SA.

3.34 The Sustainability Appraisal of the Revised Preferred Options was circulated at this stage.

3.4 Core Strategy: Proposed Amendments Paper - July 2009

- 3.41 A number of matters arose following publication of the Revised Preferred Options which required eight policies to be changed significantly, with the amended policies subject to consultation.
- 3.42 The Sustainability Appraisal of the Proposed Amendments Paper was also circulated for consultation at this stage.

3.5 Core Strategy Submission - January 2010

- 3.51 The city council submitted its Core Strategy to the Secretary of State in January 2010, following a period of consultation on the soundness of the document. This document included seven Development Area policies, which included strategic allocations for development, six Special Area policies and 18 Citywide policies. Some policies were revised following consultation and political priority and all policies underwent further assessment under the Sustainability Appraisal.
- 3.52 A Sustainability Appraisal formed part of the submission documents.
- 3.53 Soundness issues were raised during an exploratory meeting with the Planning Inspector in May 2010 concerning housing delivery and following procedural meetings held as part of the examination process, the city council took the decision to withdraw the Core Strategy to enable it to be updated and amended.

3.6 City Plan: Policy Options Papers – October 2011

- 3.61 Following withdrawal of the Core Strategy, four policy options papers were produced and were subject to consultation. The policy options papers considered the key issues that the City Plan needed to tackle in addition to providing the opportunity to consult on new policy areas.
- 3.62 The various issues and options for each topic area were set out in the papers, and all were subject to Sustainability Appraisal.
- 3.63 A Sustainability Appraisal on the Policy Options Papers was circulated for consultation at this time.

3.7 Draft City Plan Part 1 – May 2012

- 3.71 The first draft City Plan Part 1 was produced. It contained eight Development Area policies, including a new policy covering the Toads Hole Valley area, six Special Area policies, and 22 Citywide policies including a new policy covering Student Housing. Policies were revised to take into account representations received on the Proposed Submission document, as well as representations received at Policy Options Paper stage. In addition, policies were amended to ensure conformity with the National Planning Policy Framework.
- 3.72 A Sustainability Appraisal on the City Plan Part 1 was produced and was subject to consultation.

3.8 Proposed Submission City Plan Part 1 – January 2013

- 3.81 The policies have been refined to take into consideration representations received during the consultation period, as well as to take into account findings from update studies.

- 3.82 The policies which were amended significantly enough to change the findings of the previous assessment have been re-assessed against the Sustainability Appraisal Framework and the findings published in the Sustainability Appraisal report. Policies which had not changed significantly and which were not considered to change the findings of the previous SA, were not subject to further assessment.
- 3.83 The Sustainability Appraisal report is now out for consultation under Regulation 19, alongside the City Plan Part 1.

4.0 Sustainability Issues in Brighton & Hove

4.01 This section provides a brief summary of the sustainability issues facing the city. More detailed information can be found in Section 4 of the full Sustainability Appraisal Report.

4.1 Environmental Issues

4.11 Ecological Footprint – Ecological Footprint uses units of area to assess an individual's environmental impact. In Brighton & Hove, the Ecological Footprint is 5.14 global hectares per person, which although reduced from 5.72 gha/person in 2004 is still higher than the regional and national averages.¹ The Sustainable Community Strategy 2010 aims to achieve a reduction to 2.5ha per person by 2020.

4.12 Climate Change - Climate Change has been identified as one of the key challenges facing the UK. Climate changes in the UK are likely to include: changes in annual/seasonal average temperatures, rising sea levels, and increased frequency of extreme conditions which may lead to more flooding, subsidence and droughts. These will have different effects on different regions and are likely to have an adverse impact on the following: water resources, water quality, biodiversity, health, building and infrastructure, soils and the economy.²

4.121 The Government has recently re-affirmed its commitment to carbon dioxide emission cuts of 80% by 2050, based on a 1990 baseline, through the Climate Change Act 2008. This goes much further than the international Kyoto protocol on climate change, which requires the UK to provide a 12.5% reduction of greenhouse gas emissions by 2012. Significant action will be required in order to meet this target.

4.122 DTI Energy trends for domestic gas and electricity consumption indicate that energy use in the home is responsible for 42% of Brighton & Hove's CO₂ emissions, with 32% of our carbon emissions coming from industry and commerce and 26% from transport.³ Transport related emissions have risen by 7% from 2009. Figures from DEFRA show that Brighton & Hove emitted a total of 1,285 kilo-tonnes of carbon dioxide in 2010, equivalent to about 5.0 tonnes per capita, a reduction from 5.7 kt per capita in 2005, although an increase on recent years production. The Sustainable Community Strategy and Climate Change Strategy set a target for reduction of direct carbon emissions by 42% by 2020.

4.13 Flood Risk - As a coastal city, tidal flooding is an issue and is a potential constraint to the location of new development. It is estimated that sea level will continue to rise, increasing the risk of tidal flooding and erosion.⁴

4.131 In relation to tidal flooding, the majority of the city is located in Flood zone 1 (low probability of flooding). Certain areas of the coastal frontage are located in flood zone 2 (medium probability), flood zone 3a (high probability) and flood zone 3b (functional floodplain). Much of the area at risk of tidal flooding is protected by defences, however the residual risk remains. Wave over-topping poses a significant risk in the south east and can increase the extent of flooding.

4.132 Surface water flooding is a particular risk because of the highly urbanised nature of the city. This can have potential adverse impacts on the groundwater resource as

well as impacting on communities. Groundwater flooding is also a potential risk due to the high permeability of the underlying chalk South Downs, and linked to this is the potential for sewer flooding if infrastructure becomes inundated with groundwater.

- 4.133 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.⁵
- 4.14 Air Quality** - Road vehicles are the greatest contributing factor to poor air quality in Brighton & Hove. Generally vehicles are more polluting if they are heavier, older or run on diesel. However the position and geometry of buildings relative to the carriageway also significantly effects air quality due to dispersal.⁶ The Local Authority has a duty to review air quality under the Environment Act 1995, with the objective to determine whether national air quality standards have been exceeded. The results of a Detailed Assessment in 2004 found three areas which did not meet the annual Air Quality Objective for Nitrogen Dioxide (NO₂) and as a result of this an Air Quality Management Area was declared that covered the Lewes Road, Grand Parade and Preston Circus/London Road areas.
- 4.141 A further Detailed Assessment carried out in 2007 found there to be 14 areas that did not meet the annual Air Quality Objective. As a result of this a revised Air Quality Management Area (AQMA) was declared in 2008. The AQMA 2008 covers a much larger area of the city; from the boundary with Adur District Council in the west, to Old Shoreham Road in the north, and to Arundel Road in the east. Again, the AQMA is in respect of the exceedance of the Nitrogen Dioxide (NO₂) annual Air Quality Objective (AQO). In 2010 two monitoring locations outside the AQMA were found to exceed the annual objectives and have been subject to a Detailed Assessment.
- 4.142 Monitoring results showed that levels of NO₂ generally improved between 2003 and 2008. Since then, monitoring results have shown limited improvements and that concentrations of NO₂ exceed the annual air quality objective at a number of roadside locations, with improvements as high as 48% needed in some cases in order to meet the air quality objective.⁷
- 4.143 Monitoring of particulate matter PM_{2.5} occurs at Preston Park which forms part of DEFRA's national network. In 2011 the annual mean objective was 12 Gg/m³ (against the EU target of 25Gg/m³), although monitoring data shows short term spikes. A new monitoring location for particulate matter PM₁₀ was established in 2010 with the first full year's data for 2011 reporting an annual mean of 27.4 Gg/m³ against the annual average limit value of 40 Gg/m³.
- 4.15 Transportation** - A good local transport system is needed to meet the needs of all residents and a balance between competing modes of transport must be sought. However, as road traffic is responsible for producing 26% of the city's carbon emissions and is also the main source of nitrogen oxides and particulate matters, sustainable transport and reducing the need to travel is imperative. In addition to contributing to climate change, poor air quality, and high levels of road-related noise, high amounts of road traffic also lead to congestion, which impacts on more sustainable forms of transport.

- 4.151 Nationally the number of cars on our roads is growing. However car ownership in Brighton & Hove averages at only 0.87 cars per household, which is lower than the regional average of 1.3 and the national average of 1.1.⁸ Census data (2001) indicates that 49.4% of the population travel to work by car, which although high is significantly lower than the national average of 65.9%. The Sustainable Community Strategy (2010) sets a target of achieving between 10-20% reduction in car use by 2026. Results from the Census 2011 are still outstanding.
- 4.152 Bus patronage has increased year on year from 30.2 million journeys in 2000/01 to 46.3 million in 2009/10 representing a 5% annual increase.⁹ There have been many improvements to the bus network, including creating accessible bus stops and introducing real-time information at many frequently used bus stops. However, bus fares have increased in recent years, with some journeys requiring more expensive tickets. There are eight stations that serve the rail network located within Brighton & Hove, most act as passenger interchanges for all forms of transport. The combined annual footfall at all stations is 19,250,000.¹⁰
- 4.153 Walking is a popular choice in the city, with data from the Census 2001 showing that 17.2% travel to work on foot compared to 10% nationally, however there are several areas within the city that are not pedestrian friendly and lack permeability. Cycle use for travel to work in the city is 2.7%, which is similar to the national average (2.8%) and slightly below the regional average (3.1%).¹¹ The city includes a number of cycle routes including National Cycle Routes 2 and 20, and Regional Cycle Routes 82 and 90, as well as a number of local routes, however the city does not have a full cycle network. A significant amount on investment in cycling infrastructure has occurred through the Cycling Demonstration Town award.
- 4.16 Water** - Winter rain is vital to refill reservoirs and increase river flows and groundwater recharging. The lack of winter rainfall in 2011/2012 has led the Environment Agency to apply “drought” status to the south east region in 2012, although this status has now been removed following high levels of rainfall throughout 2012. Progressive reduction of water use leading up to water neutrality in developments is one of the key challenges for the region in general and Brighton & Hove in particular.
- 4.161 A significant proportion of the city overlies the Brighton Chalk Aquifer. This is an important groundwater resource supplying water for public consumption and supplies the needs of Brighton & Hove and the neighbouring towns on the south coast. Groundwater quality in the Brighton Chalk aquifer is at risk of deterioration from nitrates and pesticides, relating to rural as well as urban inputs, as well as at risk from saline ingress from the sea and other rivers. Construction works also have the potential contaminate the aquifer. The status of the aquifer is currently classified as “poor”.¹²
- 4.162 The quality of our seawater is of equal importance in terms of environmental quality and its value as a recreational asset. In 2010, seawater quality in Brighton was measured as “good”, in Hove was measured as “good”, and Kemp Town was measured as “good”.¹³ As of 2011, monitoring reflects the requirements of the Bathing Waters Directive, with Brighton, Hove and Kemp Town all achieving “Higher” status.

- 4.163 The requirements of the EU Water Framework Directive means that all bodies of water (including surface water, coastal waters and groundwater) will need to achieve “good” status by 2015 and the quality of all water resources needs to be protected.
- 4.17 Waste** - Currently the majority of Municipal Solid Waste (MSW) produced by Brighton & Hove is disposed of at landfill with 46% disposed in this way 2001/02.¹⁴ This amount has generally been decreasing year on year since 2001/02. Badly managed landfill can lead to air and water pollution or soil contamination and the decreasing landfill available creates a challenge for the future disposal of waste. There are also issues concerned with the transportation of waste to landfill sites, placing a burden on our road transport system, as well as contributing towards climate change and poor air quality.
- 4.171 In 2010/11 Brighton & Hove achieved a recycling rate of 23.4%¹⁵ This figure has increased since 2001/02 when the total MSW recycled was only 8.56%.¹⁶ In addition to increasing our recycling rates, the amount of waste produced also needs to be reduced and in 2010/11 the amount of municipal solid waste collected per household was 605kg.¹⁷
- 4.172 In East Sussex and Brighton & Hove, construction and demolition wastes amount to around half the total waste produced.¹⁸ Any future development in the city must ensure that the amount of waste arising from any construction activity is reduced as far as possible.
- 4.18 Biodiversity** - The distribution and types of species found in an area is a good indicator of the state of the wider environment. Even in urban areas, where natural habitats are often highly modified and fragmented, the presence of a range of beneficial species can be a good indicator of environmental quality.
- 4.181 The UK Biodiversity Action Plan (1994) established clear objectives for the maintenance, connection and extension of key habitats and species found throughout the UK. Local Biodiversity Action Plans (BAP) include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest. Brighton & Hove City Council is a member of the Sussex Biodiversity Partnership which is responsible for producing and overseeing the implementation of the Sussex BAP. In addition, Brighton & Hove is currently producing a local BAP which is was subject to initial consultation in 2011. A Green Network for Brighton & Hove will provide the spatial component of BAP habitat targets. A network has been progressed as a partnership project between Sussex Wildlife Trust and the Council. The aim is to define and create a continuous green network of routes through the city. The network will include the locations for the creation of new habitats (to meet BAP habitat creation targets) and help to mitigate the effects of Climate Change by reducing species isolation and facilitating the movement of species across the urban environment.
- 4.182 Brighton & Hove has a wealth of designated wildlife sites. Castle Hill is of European and UK importance, having been designated a Special Area of Conservation (SAC) under the EC ‘Habitats’ Directive and a National Nature Reserve and Site of Special Scientific Interest (SSSI). The city's other nationally important wildlife site is Brighton to Newhaven Cliffs SSSI. There are eight designated and proposed Local

Nature Reserves in the city, these being Bevendean Down, Beacon Hill, Benfield Hill, Ladies Mile, Stanmer Park, Whitehawk Hill, Wild Park and Withdean Woods. The city has also designated 62 Sites for Nature Conservation Importance (SNCIs) which are currently under review.

4.183 The City Sustainability Partnership and Brighton & Hove City Council are currently working with other adjoining authorities to achieve Biosphere Reserve status for the city and wider area, including land situated in Adur, Horsham, Mid Sussex and Lewes districts. A bid will be submitted to achieve this status in 2013 and will help to deliver a unified approach to better care for, manage and enjoy the local environment.

4.19 Landscape - Brighton & Hove is a compact city of 8,267 hectares built on rolling hills and valleys and situated between the South Downs and the sea. The majority of the resident population live in the built up area that comprises roughly half this area. Following the South Downs National Park Inquiry in 2003, the Planning Inspector supported the principle of establishing the National Park. The government confirmed the Designation Order in 2009 and the new South Downs National Park was confirmed from April 2010.

4.191 The South Downs is important for the quality of its landscape, as a recreational asset and an ecological resource. 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 or setting of the National Park.

4.192 The main geological interest on Brighton & Hove's coastline is the chalk cliff line to the east of Black Rock. The cliffs are designated a Site of Special Scientific Interest (SSSI), a Regionally Important Geological Site (RIGs) and a Geological Conservation Review site (GCR).

4.20 Open space and recreation - Green open spaces provide a variety of benefits. They can help to improve our health, by contributing to our physical, mental, and emotional well-being.

4.201 The Open Space, Sports and Recreation Study 2008, was undertaken to establish a baseline of existing provision and set open space standards for quantity, quality and accessibility. The study has helped to demonstrate whether there are deficiencies or over-supply. It does not identify any surplus open space and demonstrates that the city will need to retain and effectively use all existing (both public and private) open space and create more areas of open space by 2026 in order to meet the needs of the future predicted population.

4.202 The study also assessed provision of indoor sports facilities. The survey found that some additional indoor facilities would be needed, including swimming pools, sports hall space, and health & fitness stations.

4.203 An update to the Open Space Sports and Recreation Study carried out in 2010 re-assessed all areas of open space at a local level. The study endorses the existing standards and found that at a local level there is significant variation in the supply of open space, with most wards falling below the standards in at least one of six categories.

4.204 With sporting facilities such as the Brighton Race Course and Sussex Cricket Ground Brighton & Hove contains sporting facilities of regional and sub-regional importance. As well as providing fun, exercise and a sense of achievement, participation in sport and active recreation helps to create sustainable communities, good health and well being, social inclusion and promote good educational attainment.

4.21 Cultural Heritage - The city has an extremely attractive historic urban environment. There are around 3,400 listed buildings, 15 scheduled ancient monuments, six registered parks or gardens of special historic interest and 34 conservation areas.¹⁹ However a recent survey identified 6 of these Conservation Areas as being at risk.²⁰ The historic built environment of Brighton & Hove, particularly its rich Regency and Victorian legacy, was recognised of being of regional importance in the South East Plan; this historic environment is acknowledged as a tremendous asset, part of the regional and local character and sense of place, acting as a 'draw' for those investing in the area. Historic buildings are also an important cultural asset, contributing to positive visitor experience and tourism revenue, which is important to the local economy. They further provide an archaeological and educational resource for the future.

4.22 Contaminated Land - Brighton & Hove City Council has a statutory duty to produce a strategy to deal with 'contaminated land' in its area and to ensure that any contaminated land which is identified, is then remediated. The city council already holds information on some areas of land that has contaminants due to submissions under the development control process and has also undertaken a study of historical uses to ascertain whether areas of land have potential for contamination due to a previous or existing use. There are a number of sites with potential for significant contamination in Brighton & Hove.²¹

4.3 Social Issues

4.31 Demographics - Brighton & Hove has a resident population of 273,400.²²

- 43% of the population are aged between 20-44 which is higher than the national average of 33%
- 15% of the population are aged under 14 which is lower than the national average of 18%
- 7.7% of the population are unemployed.
- 13% of its population are students.

4.32 Housing - There are a number of issues related to housing:

- Brighton & Hove has the highest overcrowding rate outside London²³
- Despite the recent downturn, the city's housing remains largely unaffordable to the majority of its residents²⁴
- The average cost of a property is ten times a person's average income²⁵
- The annual affordable housing need is much greater than actual build delivery levels²⁶

4.321 Housing affordability is a major issue for the city, particularly for families and newly forming households. A lack of decent affordable housing contributes to social exclusion, impacts on labour supply and thus economic prosperity, generates long distance commuting and threatens public services. Given the evidence of the scale

of housing need, planning must ensure that the affordable housing secured as part of new residential development across the city matches the local housing/accommodation needs and requirements of particular groups and communities. In 2010/11 affordable housing delivery levels were extremely low with only 8 units delivered, compared to 100 in the previous monitoring year, although this is reflective of lower housing delivery levels generally in the city. Affordable housing completions rose in the most recent financial year, again reflective of an increased number of housing delivered.

4.322 There are approximately 33,000 students at the local Universities. The recruitment of full time students is expected to increase over the coming years and as a result there is expected to be a significant shortfall of bed spaces in purpose built student accommodation. The private sector has responded to this shortfall and there has been a significant conversion of family housing to student occupied Houses in Multiple Occupation in many neighbourhoods.²⁷

4.33 Health & health inequalities - Brighton & Hove is a member of the World Health Organisation's Healthy Cities Network, whose healthy urban planning principles include:

- Human health as a key element of sustainable development
- Co-operation between planning and health agencies
- Health integrated plans and policies

4.331 Healthy urban planning aims to positively influence the determinants of health particularly by the encouragement of healthy lifestyles and the provision of infrastructure that facilitates that lifestyle. This encompasses the need to provide access to healthy housing, sport facilities, recreation, cultural and community facilities, healthy food, care and health facilities.

4.332 Local health issues include health inequalities, mental health and suicide, alcohol and substance misuse, sexual health, and cancer.²⁸ Other local health issues include those relating to poor air quality, obesity, teenage pregnancy and prevalence of smoking.

4.34 Deprivation - Based on the Index of Multiple Deprivation 2010, Brighton & Hove is ranked as the 66th most deprived authority in England.²⁹ This has increased from 79th in 2007 although cannot be directly comparable due to changes in measuring deprivation. 11% of the Super Output Areas (SOA) in the city fall within the 10% most deprived SOAs in England when looking at overall deprivation with 11 SOAs falling in the 5% most deprived. The Reducing Inequalities Review (2007) highlights that significant inequalities continue to exist between different areas and communities in the city. It also found that the majority of people facing deprivation do not live within the city's deprived areas although those facing multiple deprivation do tend to live within the most deprived areas.³⁰

4.341 The Review found the major socio-economic problems the city faces are around:

- Health inequalities, particularly around mental health
- Drug, alcohol and substance misuse
- Low or no skills among sections of the population
- A quarter of all children live in households with no working adults
- High number of people claiming incapacity benefits
- Above average number of young people not in education, employment or training

4.342 Child poverty is high in the city, with 22% of children in the city classed as living in poverty. However, this varies greatly across the city, with the Moulsecoomb & Bevendean and East Brighton wards having child poverty levels of 44.7% and 46% respectively. A Child Poverty Strategy is currently being developed.

4.35 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.³¹ 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, with the noise-mapping exercise undertaken by DEFRA indicating that there are many junctions and roads where noise levels exceed 75db, and this can have impacts on health.³² In Brighton & Hove, a noise action plan produced in 2010 identified 2,250 dwellings within important areas that needed further investigation because of the effects of road traffic noise.

4.4 Economic Issues

4.41 Economy, employment and skills – The UK recently suffered its longest and deepest recession since the 1930’s resulting in a 6% loss in output between the end of 2008 and 2009³³. The economy grew by only 0.8% in 2011, however shrunk by 0.3% in the last quarter of 2011 and a further 0.2% in the first quarter of 2012.³⁴ It is estimated that city may lose 3,400 public and private sector jobs as a result of the Coalition Government’s deficit reduction programme. This, in addition to the projected additional 2,700 working age people means that around 6,000 new jobs will need to be created by 2014 simply to maintain the current employment rate³⁵

4.411 The percentage of people who were economically active in 2011/12 was 70% which is higher than the national average but lower than the regional average³⁶. The employment rate decreased by 2.2% over the period 2004-2009. This is despite 6,300 more people being in work now than in 2004 and is due to the increase in the working age population.³⁷ The working age population is projected to grow by 12,000 over the next ten years, which means that more than 8,000 people may need to find work for the employment rate to remain the same.

4.412 The city is exporting more workers than it attracts and high levels of travel to and from the city increase pressure on the transport infrastructure. Long-term economic sustainability is only likely to be achieved by developing high value added businesses locally that will retain higher skilled workers, and through provision of sufficient employment land to meet local needs and support economic growth.

4.413 Brighton & Hove has one of the most highly qualified adult populations in the country, with 43% of residents holding a Level 4+ (degree or equivalent) qualification.³⁸ However, 8% of the working age population have no qualifications, educational attainment in schools is below average and there is a concern regarding the number of young people who are Not in Education, Employment or Training (NEET) which increased from 7.8% in 2008 to 8.4% in 2011.³⁹

4.42 Tourism - The tourism sector is an important source of employment in the city. In 2010/11 the value of tourism to the city was measured as £732 million with over 18,500 jobs supporting the tourism industry.⁴⁰ Culture and creativity are important

to the city's prosperity and enhancements to the built and natural environment have been central to many of the city's major regeneration projects including Brighton Dome and Museum and seafront regeneration. The recent confirmation order of the South Downs National Park also provides opportunities for the city, with the potential for the city to act as a gateway for people wishing to access the Downs. To ensure that Brighton & Hove continues to be a destination tourists wish to visit, there needs to be ongoing investment in infrastructure and the physical environment, including sustainable transport, there is a need to encourage and implement sustainable tourism principles, there is a need to improve the quality of offer and increase standards.⁴¹

4.43 Other industries

Other sectors in the city which employ a significant amount of employees include the Financial & Business Services (approx 45,000 employees), Retail & Wholesale (approx 20,000 employees), Education & Health (approx 34,000 employees), and the Creative Industries (approx 24,000 employees).⁴² The third sector, including voluntary and community organisations was estimated at £96.5 million in 2008.⁴³

5.0 The Sustainability Appraisal Objectives

5.01 A number of Sustainability Appraisal objectives were established at the scoping phase and have been revised and updated in response to consultation. The Sustainability Appraisal objectives are used to identify the positive and negative impacts that the citywide policies and development and special area policies may have on the environment, the economy and the social characteristics of the city.

5.02 The Sustainability Appraisal Objectives:

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.
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.
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and archaeological sites and their settings effectively.
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.
5. To meet the essential need for decent housing, particularly affordable housing.
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.
7. Minimise the risk of pollution to water resources in all development.
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
9. To promote the sustainable development of land affected by contamination.
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
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.
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.

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.
14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
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.
16. To engage local communities into the planning process.
17. To make the best use of previously developed land.
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.
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
20. To encourage new developments to meet the high level Code for Sustainable Homes/BREEAM 'Excellent' standard.
21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and food stores.
22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

6.0 Appraisal of the policies

6.01 Refinements have been made to some policies resulting from consultation comments or from findings of up to date studies. A scoping exercise was carried out on all policies to determine whether the revised policy needed further appraisal. Policies which were amended to such an extent that the previous SA findings/scores were considered to be altered then underwent further assessment against the SA Framework.

6.02 The following table shows which policies did or did not require further assessment.

Policy	SA required
DA1 Brighton Centre and Churchill Square	Yes
DA2 Brighton Marina	Yes
DA3 Lewes Road	Yes
DA4 New England Quarter and London Road	Yes
DA5 Eastern Road and Edward Street	Yes
DA6 Hove Station Area	Yes
DA7 Toads Hole Valley	Yes
DA8 Shoreham Harbour	Yes
SA1 The Seafront	Yes
SA2 Central Brighton	Yes
SA3 Valley Gardens	Yes
SA4 Urban Fringe	Yes
SA5 The South Downs	No
SA6 Sustainable Neighbourhoods	No
CP1 Housing Delivery	Yes
CP2 Sustainable Economic Development	No
CP3 Employment Land	Yes
CP4 Retail Provision	No
CP5 Culture & Tourism	No
CP6 Visitor Accommodation	Yes
CP7 Infrastructure & Developer Contributions	No
CP8 Sustainable Buildings	Yes
CP9 Sustainable Transport	Yes
CP10 Biodiversity	No
CP11 Flood Risk	No
CP12 Urban Design	Yes
CP13 Public Streets and Spaces	No
CP14 Housing Density	No
CP15 Heritage	Yes
CP16 Open Space	No
CP17 Sports Provision	No
CP18 Healthy City	No
CP19 Housing Mix	No
CP20 Affordable Housing	No
CP21 Student Accommodation & Houses in Multiple Occupation	No
CP22 Traveller Accommodation	No

6.03 In addition, two options for a new policy were assessed, Policy SS1 The Presumption in Favour of Sustainable Development. The new policy will form part of the Spatial Strategy and is proposed in order to respond to guidance for other local authorities from the Planning Inspectorate which aims to ensure that Local Plans demonstrate compliance with national policy, in particular the presumption in favour of sustainable development as set out in the National Planning Policy Framework.

6.1 Summary of Assessments

6.11 The following tables indicate the anticipated impact in the long term, unless otherwise stated and uses the following key:

++	The policy has a significant positive effect on the SA objective
+	The policy has a positive effect on the SA objective
0 or blank	The policy has no effect on the SA objective
-	The policy has a negative effect on the SA objective
--	The policy has a significant negative effect on the SA objective
-/+	The effects are considered to be mixed.
?	The effects on this objective are uncertain

6.2 SS1: The Presumption in Favour of Sustainable Development

Issue: To ensure local plans demonstrate compliance with the NPPF

- **Option 1:** Inclusion of model policy as drafted by PINS
- **Option 2:** Inclusion of policy with amendments made by city council

The Main difference in wording is the substitution of the original wording “it will always” to “where appropriate”. Other amendments include re-arrangement of original wording.

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

6.21 Conclusion and Recommendations

- The main difference between the two policies that has an impact on the sustainability appraisal is the wording in option 1 “it will always” which is substituted in option 2 to “where appropriate”. The SA considers that this wording in option 2 isn’t as strong as the wording in option 1, is potentially more subjective and may be open to interpretation unless clear circumstances where development is or is not appropriate is included as supporting text.
- The SA found that the wording “it will always” in option 1 may result in more proposals being approved than with option 2. This has therefore led to a more positive score on some of the developmental sustainability objectives for option 1, including provision of housing, employment and economic development.

- There is not considered to be any significant difference between the scores for options against other sustainability appraisal objectives, as the wording in both policy options that requires improvements to local environmental, social or economic conditions would provide mitigation regardless of the amount of development delivered. This wording, in addition to the policies outlined in the NPPF, in cases where only these would be applied, was found to achieve positive outcomes against almost all sustainability appraisal objectives.
- The impact on the objectives relating to reducing car journeys and improving air quality was found to be negative, with it considered unlikely that an increase in development would cause a reduction in car journeys made, nor that total mitigation could be achieved.
- With option 2, there is some degree of uncertainty across most of the objectives, because the circumstances under which a proposal would not be considered appropriate are unknown. For instance, if impacts on biodiversity are grounds for when a proposal is considered not to be appropriate, then the score for option 2 may be more positive than the score for option 1 against the biodiversity sustainability appraisal objective.
- The SA suggested that if option 2 is put forward there needs to be further explanation and clarification in the supporting text, as to what is not considered to be appropriate.
- Option 1 has potential for stronger positive impact against the developmental objectives, due to the wording “it will always” and is therefore the preferred option. However, the difference between the remaining objectives remains insignificant.

6.3 Development Area Policies

6.31 DA1 – Brighton Centre & Churchill Square

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

- The policy proposes significant retail development and replacement conference facilities and is therefore likely to have a significant positive impact in the medium to long term on the employment and economic development objectives.
- The policy is also likely to lead to improvements in public realm and townscape, improve accessibility and increasing community safety.
- The policy has potential to have a negative impact on the objectives relating to improving air quality and reducing car journeys. New retail development may result in an increase in people travelling to the area, as may new conference facilities. Any increase in traffic will have implications for health in the long term due to air quality and noise.
- As the policy incorporates proposals for development, the policy could lead to an increase in water consumption and production of waste.

6.32 DA2: Brighton Marina

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

- The policy should lead to a range of development including housing, employment, retail and leisure floorspace and is therefore likely to have a significant positive impact on the housing, employment and economic development objectives. The SA noted that the industrial floorspace that was previously anticipated for the area would need to be located elsewhere to ensure this sector of the economy is not constrained.
- The policy is likely to lead to remediation of contaminated land and improved accessibility.
- The requirement for development to be below cliff height should ensure that the setting, and views from and of the South Downs National Park are protected in this area, as well as having benefits for the adjacent historic built environment.
- The SA considers it unlikely that the full open space requirements of the future population will be met on site, due to site constraints and competing land uses.
- There could be a negative impact on biodiversity found within or adjacent to the area, some of which is of local, national and international significance, and some of which relies on the unique environment created by the Marina. The policy priority to protect and enhance the biodiversity, geodiversity and key designated sites should address this concern.
- The policy was found to have a negative impact on objectives relating to flood risk, with the Strategic Flood Risk Assessment (SFRA) 2012 identifying areas within the marina at risk of surface water flooding as well as parts being situated within floodzone 3a.
- The policy had potential for a negative impact on objectives relating to air quality and car journeys due to the significant amount of development proposed. This is likely to put increased pressure on transport availability, may result in an increase in people travelling by car, as well as car ownership in the local area, or an increase in other employment related journeys, and could have a negative impact on health in the long term.

6.33 DA3 – Lewes Road

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

- The policy should lead to a range of development including housing, student housing, employment and academic floorspace and is therefore likely to have a significant positive impact on these objectives.
- The policy should improve access, through improvements to public transport infrastructure, pedestrian and cycling routes, as well as provision of specific developments including a community building; and should lead to improvements to existing open spaces and public realm.
- The strategic developments should also have positive impacts on reducing consumption of energy, with the requirement to be zero carbon.
- The policy recognises the sensitive nature designations that exist within or adjacent to the area and overall, the policy should have positive impacts on biodiversity, with this being a priority for the entire area, although remains uncertain until implementation.
- The policy should result in improvements to public realm and townscape, however may have adverse impacts on locally designated sites and may increase the pressure on existing open space, particularly towards the south of the development area.
- The policy is also considered to have mixed impacts on the objective relating to the use of previously developed land. Development across the Preston Barracks site, some of which is not in any current productive use is likely to have significant positive impacts, however development on a Greenfield site has negative impacts on this objective.
- Development in some locations within the area could increase the risk of surface water flooding, potentially causing pollution to groundwater, however the policy contains references which support this prevention.
- In the short and medium term, the policy was found to have overall positive implications for health, particularly through delivery of housing, employment opportunities and general improved attractiveness throughout the area, however the potential increase in traffic to and within the area may have health implications in the longer term.
- The policy has potential to have a negative impact on the objectives relating to air quality and reducing car journeys despite the positive measures and priorities outlined in the policy. New development of any kind is likely to put increased pressure on transport infrastructure available, may result in an increase in people travelling by car, or car ownership locally and could increase employment-based journeys.

6.34 DA4: New England Quarter & London Road

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

- The policy will lead to delivery of new housing, student housing and office floorspace, as well as the refurbishment and upgrade of existing employment sites

having positive impacts for range of sectors including the creative industries and digital media sector.

- The policy should result in improved sustainable transport routes and improved links in and between the area.
- The policy is likely to have other positive impacts including improving biodiversity, improving community safety and should make the best use of previously developed land with a range of vacant and/or under-utilised sites with potential for development named in the policy.
- In addition, the new requirements for decentralised energy infrastructure, should have positive implications for energy reduction.
- The policy also has the potential to have a positive impact on health, through delivery of measures such as housing, employment, and community infrastructure that are all wider determinants of health. However, there could also be a negative impact on health in the long term through anticipated increases in traffic and the associated reduction in air quality.
- New development of any kind is likely to put increased pressure on transport infrastructure available and may result in an increase in people travelling by car, or car ownership in the area, or an increase in employment-based journeys, leading to increased congestion and a reduction in local air quality.
- In addition, the policy is likely to increase pressure on existing open space, and increasing the risk of surface water flooding.

6.35 DA5 Eastern Road and Edward Street

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

- The policy should lead to a range of development including housing, student housing and employment floorspace, and an increase in hospital floorspace, and is therefore likely to have a significant positive impact on the housing, employment and economic development objectives. However, the reduction in employment floorspace to be delivered in this area has led to an uncertain impact on objectives 11 and 12, and will need to be delivered elsewhere to ensure the local economy is not constrained.
- The policy should lead to improvements to sustainable transport infrastructure and provision, and should increase the land use efficiency on some of the strategic sites.
- The policy should enhance biodiversity through tree-planting and landscaping; should improve community safety; and should reduce deprivation, which is currently significant in neighbourhoods in and around the area, particularly through the requirement to secure training places for local people.
- In addition, the new requirements for decentralised energy infrastructure, should have positive implications for energy reduction.

- There is concern that the open space needs of any increased local population will not be met, with the area currently not able to meet the open space needs of the existing population.
- Some of the strategic sites are located within areas of surface water flood risk, with the risks potentially increasing as a result of climate change.
- The policy may lead to a reduction in air quality and an increase in car journeys despite the positive measures contained in the policy, and is considered to be of more significance in the medium term, with implementation of the rapid bus-based scheme reducing this significance in the long term. New development of any kind is likely to put increased pressure on transport infrastructure available and may lead to an increase in people travelling by car or other vehicles for personal and employment-related journeys in the local area, having implications on air quality, health and wider environmental issues. In addition, hospital related journeys are likely to increase to the area.
- In the short and medium term, the policy was found to have overall positive implications for health, particularly through delivery of housing, employment opportunities and general improved attractiveness throughout the area, however the potential increase in traffic to and within the area may have health implications in the longer term.

6.36 DA6 Hove Station

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

- The policy should lead to delivery of housing having a positive impact on the housing objective.
- The policy should lead to replacement of some but not all of the existing floorspace in the area, and although the policy should help to meet the needs of small businesses, creative and digital media industries through provision of appropriate and affordable work space and is therefore likely to have a significant positive impact on the employment and economic development objectives this is considered to be uncertain, due to the net loss.
- The policy seeks to make more efficient use of under-used sites, and should lead to improvements to the sustainable transport interchange and improvements to the walking and cycling networks.
- The policy may lead to a reduction in air quality and increase in car journeys despite the positive measures outlined in the policy. New development of any kind may put increased pressure on the current road network, and transport infrastructure, either through increased local car ownership or increased employment related journeys.
- The policy is considered to have positive impacts by specifically referring to protecting the groundwater resource and incorporating surface drainage.
- The policy has the potential to have a positive impact on health, through delivery of measures such as housing, and opportunities for employment, both of which are wider determinants of health. However, there could also be a negative impact on

health in the long term through anticipated increases in traffic and the associated reduction in air quality.

6.37 DA7 – Toads Hole Valley

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

- The policy should lead to deliver of housing and employment floorspace, as well as a new school and various other supporting uses and is therefore likely to have significant positive impacts on the provision of housing, employment and economic development. The policy requirement that 50% of residential units provided across the scheme is of 3 or more bedroomed properties, should help contribute to meeting the family housing needs of the city.
- The policy should result in provision of open space, with the requirement for the scheme to incorporate public open space, children’s play facilities and food growing space, as well as improve links to existing provision.
- The policy should result in improved links to the South Downs National Park (SDNP), and should lead to improved sustainable transport access including pedestrian and cycle links.
- Overall, the policy should have a positive impact on health, through delivery of housing and employment opportunities, which are both wider determinants of health, as well as through improved access to services. However there may be adverse impacts for the new community associated with noise or other traffic impacts caused by proximity to the A27.
- The impact on the SDNP was found to be positive yet uncertain, as although the policy requires development to complement the setting of the SDNP, there could be visual impacts which may impact on the setting.
- The location of the site, in terms of ease of access to the wider road network and lack of access to existing public transport provision may impact on choices around car ownership as well as on mode of travel to/from the area, and could result in an increase in private journeys made. In addition, the delivery of 25,000sqm of office space is likely to result in a considerable amount of journeys made for employment purposes to and from the area.
- The policy requires the protection of sensitive groundwater protection zones and for surface water flood risk to be reduce, and should therefore have positive impacts on these objectives.

6.38 DA8 – Shoreham Harbour

6.381 Brighton & Hove City Council is currently working with Adur District Council and West Sussex County Council on proposals to produce a Shoreham Harbour Joint Area Action Plan. The Joint Area Action Plan (JAAP) will be the planning document which provides the framework and guidelines for developers and will clarify the area of land which could be considered for regeneration, as well as what kind of

development would be acceptable in the area. The Brighton & Hove City Plan and Adur Local Plan both also contain a policy on Shoreham Harbour as they are the overarching planning documents for the area.

6.382 The Shoreham Harbour policy contained within the City Plan only applies to the area that falls within Brighton & Hove.

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

- The policy should lead to delivery of housing and employment floorspace as well as lead to an intensification of existing vacant or under-used space in the port, and is therefore likely to have a significant positive impact on the provision of housing, employment and economic development.
- The policy is likely to bring about improvements in accessibility through improved linkages with surrounding areas, including the Boundary Road District Centre and local beaches.
- The policy is also likely to result in remediation of contaminated land and should result in better use of previously developed land.
- The policy may have an overall negative impact on the air quality and car journeys due to the delivery of new development, as well as through the increased output of port-based activities which is likely to lead to an increase in HGV movements to and from the area. The SA supports the priority to improve access to the North Quayside Area as this may bring about localised improvements to air quality elsewhere.
- The impacts on health are mixed, as although the policy should bring about health benefits, such as access to employment, housing and open space, the potential for air quality to worsen overall due to an increase in traffic movements could have an impact on health of surrounding communities.
- The policy may have a significant negative impact on coastal flood risk and adapting to climate change. Parts of the development area are located in areas at risk of surface water flooding, are located in flood zones 3a and 3b in relation to tidal flooding, with the risk and extent of tidal flooding anticipated to increase as a result of climate change.

6.4 Special Area Policies

6.41 SA1 – The Seafrost

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

- The policy should lead to the preservation of the historic and natural landscape value of the seafrost and adjoining historic built environment and should lead to an improvement in health, through recognition of the seafrost as an important piece of open space and opportunities for activity it provides.
- The policy should have positive impacts on housing, employment and economic development, through the delivery of development along the seafrost, and should lead to improvements in community safety and increased accessibility.
- Any development situated along the seafrost may be at increased risk from tidal flooding.
- The policy could have a negative impact on biodiversity, with some of the existing biodiversity located along the seafrost listed as a habitat of International Conservation Importance (coastal vegetated shingle). However the numerous positive references to enhancing biodiversity and conserving coastal habitats within the policy should result in a positive impact.
- Development also has the potential to increase the number of journeys made along the seafrost, or potentially increase local car ownership impacting on air quality. However, the SA notes that the policy contains numerous references and measures to improving various forms of sustainable transport, with a main priority of the policy to achieve a modal shift and reduce the impact of traffic.

6.42 SA2 – Central Brighton

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

- The policy reinforces the city's role as a regional centre for shopping, tourism, cultural and commercial facilities which will have positive impacts on employment and economic development.
- The policy seeks to protect historic buildings and recognises the distinct roles of different areas of the city centre, helping to maintain local distinctiveness.
- The policy should also have significant positive impacts on energy, through the requirement for development to incorporate decentralised energy infrastructure.

- The policy now allows for residential development as part of mixed use schemes, which has positive impacts for housing.
- The policy should also lead to improvements in community safety through the encouragement of a range of evening economy users and age-groups; and increasing accessibility to services, through improvements to the urban realm.
- The policy includes a priority to reduce congestion and promote pedestrian and cycle activity which could help maintain and may improve air quality. However, there is the potential for traffic to increase as a result of increased activity in the area or increased retail or other commercial floorspace, having an associated negative impact on air quality, also impacting on health in the long term.

6.43 SA3 – Valley Gardens

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

- The policy should lead to protection and enhancement of biodiversity in the area, should lead to enhancements to historic buildings, and should lead to improvements to public realm and through enhancing the role of Valley Gardens as a public park.
- The policy may help to improve local air quality and reduce local traffic through transport and public realm improvements, and increase accessibility through improved links and crossing points between this and other areas.
- In addition, the assessment found the effect to be significantly positive against objectives relating to health, health & safety and engaging local communities.

6.44 SA4 – Urban Fringe

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

- The policy should have positive impacts on the protection of the South Downs and preventing water pollution. Protecting the wider landscape role of the urban fringe and the setting of the SDNP, and protecting groundwater source protection zones are both key objectives of the policy.
- The policy should also have positive impacts on biodiversity, improving air quality and reducing car journeys, with the policy promoting sustainable access to the countryside; and health, with reference to local food production as well as through the wider health benefits access to the urban fringe can provide.
- The SA recognises that SA4 is a developmental policy which supports the use and management of land within the urban fringe, and permits development in an urban

fringe location when it meets certain criteria. However the policy seeks to ensure any adverse impacts are minimised, and therefore the risk for negative impacts associated with development should be reduced and on balance the policy is considered to be positive.

6.45 SA5 – South Downs

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.46 SA6 – Sustainable Neighbourhoods

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.5 Citywide Policies

6.51 CP1 – Housing Delivery

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

- The policy is likely to have a significant positive effect on provision of affordable housing and housing generally, and will have associated positive impacts on employment and economic development with delivery of housing intrinsically linked to economic growth. The SA noted that the target amount of housing to be delivered is lower than that as assessed as required, but that this amount was considered to be the most sustainable compared to higher target options (assessed at Policy Options Stage).
- The policy is likely to have positive impacts on objectives relating to health and deprivation, with access to housing one of the wider determinants of health and affordability of housing one of the measures of multiple deprivation.
- The delivery of the amount of housing proposed is likely to lead to an increase in local car ownership, and may increase in the number of private journeys made in the city, as well as employment related journeys, having associated impacts on air quality.
- The assessment found that housing located anywhere in the city has potential to have a negative impact on a number of the objectives, including those relating to: biodiversity, open space, water pollution, water consumption, energy consumption, adaptability to climate change and reduction of waste. With site specific objectives, e.g. biodiversity, the significance of these impacts will depend on the site developed.

6.52 CP2 Sustainable Economic Development

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.53 CP3 Employment Land

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

- The policy is likely to have a significant positive impact on employment and economic development through the protection of existing employment sites and provision of new employment floorspace. However, this was also found to be uncertain due to the total amount anticipated to be delivered being lower than the required amount, and that this would need to be allocated in the City Plan Part 2.
- The policy is likely to have a positive impact on increasing access to services, through increased access to employment; on health, with employment opportunities one of the wider determinants of health; reducing deprivation through the potential to increase employment opportunities in areas that suffer from employment deprivation, and making more efficient use of previously developed land, with the policy allowing redevelopment at existing sites that will increase productivity.
- The policy goes some way to reducing the need to travel by car, through the promotion of mixed use developments on appropriate sites, and through the location of employment-based development within Development Areas, the majority of which have good sustainable transport links. However, new employment-based development may lead to an increase in journeys to/from that site, either for travel to work or employment related purposes.
- As the policy is concerned with new development, the policy has potential to have a negative impact on a number of objectives, including those relating to: biodiversity, open space and local sites of importance, water pollution, water consumption, energy consumption, adaptability to climate change and reduction of waste. The significance of these impacts will depend on the site developed.

6.54 CP4 – Retail Provision

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.55 CP5 – Culture & Tourism

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.56 CP6 – Hotel & Guest House Accommodation

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

- The policy should have significant positive impacts on employment and economic development, in recognition of the benefits that the visitor-based economy brings to the city. The policy makes the commitment to create local jobs, which will be of benefit to local communities.
- The policy enables new accommodation to be built, however the requirement for an impact assessment should prevent adverse impacts on existing providers of accommodation, which is considered to be of particular benefit during the current economic climate.
- In addition, as the policy now allows for a change of use where redundancy is proven, the policy may also have positive impacts for housing.
- The policy should have positive impacts on the objectives relating to reducing transport and improving air quality, as new hotel accommodation will be located within good access to modes of sustainable transport as well as being located close to visitor attraction, through implementation of the Hotel Core Zone.

6.57 CP7 – Infrastructure and Developer Contributions

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.58 CP8 – Sustainable Buildings

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

- The policy is likely to have significant positive impacts on protecting and enhancing biodiversity, minimising water consumption, improving health, reducing energy consumption, and meeting high environmental standards.
- The requirements of this policy should ensure the avoidance of some of the potential negative impacts that are associated with other development-based policies.
- The policy may have negative impacts on delivery of affordable housing, due to financial viability.

6.59 CP9 –Sustainable Transport

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

- Overall, the policy includes various measures which should reduce the amount of journeys made by car, having positive impacts on air quality, and health including: improvements to public transport both within the city and to adjoining authorities, improved public realm, implementation of an integrated cycle network, and implementation of travel plans, amongst other measures.
- The policy should also have a positive impact on the objectives concerned with employment and economic development, through the increase of transport options that facilitate access to and within the city and through reduced congestion which can help support economic growth; should increase accessibility through the variety of measures outlined; and should help to reduce deprivation and social inequalities through improvements to sustainable transport in residential areas in the city.
- The policy proposes the use of existing car parks to be used as a form of park and ride. This may result in improvements to city centre congestion, having localised benefits for air quality, health and road safety, but could result in a displacement of these issues to around the site itself, impacting on adjacent communities. In addition, the freed up road space and parking spaces may be taken up by newly generated trips.
- As the form of park and ride to be delivered is making use of existing car parks, rather than new sites, the significance of impacts on a range of site based objectives is considered to be less than previous iterations of the policy that involved development of entirely new sites. However, any increased capacity at these existing sites may have the potential for adverse impacts, depending on the site, and is therefore considered uncertain on objectives relating to biodiversity, local distinctiveness, the South Downs, water pollution and adapting to climate change.
- The policy should assist in delivery of car free housing.

6.60 CP10 – Biodiversity

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.61 CP11 – Managing Flood Risk

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.62 CP12 – Urban Design

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

- The policy is likely to have significant positive impacts on objectives concerned with maintaining local distinctiveness and protecting key sites with this being a key aim of the policy; protecting the South Downs National Park, making the best use of previously developed land through direction of tall buildings to appropriate locations; and improving accessibility through inclusive design and direction of tall buildings to areas with good sustainable transport links.

6.63 CP13 – Public Streets and Spaces

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.64 CP14 – Housing Density

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.65 CP15 – Heritage

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

- The policy is likely to have significant positive impacts on objectives concerned with maintaining local distinctiveness, through conservation and enhancement of the city's historic landscapes, buildings and other sites. In addition, the policy will ensure that the city's built heritage guides development in historic areas.
- The policy should also lead to significant positive impacts on increasing employment opportunities and increasing economic activity, through recognition of the role culture, heritage and the South Downs play in the visitor economy.

6.66 CP16 – Open Space

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.67 CP17 – Sports and Recreation

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.68 CP18 – Healthy City

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.69 CP19 – Housing Mix

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.70 CP20 – Affordable Housing

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.71 CP21 Student Housing and Houses in Multiple Occupation

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

6.72 CP22 – Traveller Accommodation

No further assessment of this policy took place at this stage. For overall impacts, see Cumulative Impacts section.

7.0 Summary of Mitigation

- 7.01 The SA identified a range of adverse impacts that may arise from implementation of the various policies, and in particular through the delivery of development. The full SA report outlines the mitigation to reduce the likelihood of adverse impacts for each policy area. In general, mitigation was found to be provided through implementation of other policies or sometimes through the policy itself.
- 7.02 The following list provides a summary of the type of generic mitigation that would be needed. Development should:
- Maximise opportunities to protect and enhance biodiversity and increase opportunities to link to existing biodiversity. Addressed under CP8.
 - Ensure that any local or nationally designated sites are not compromised by development. Addressed under CP8.
 - Ensure housing development incorporates provision of open space in accordance with recommended standards, and meets any existing deficiencies either on site or in the vicinity - addressed under CP16
 - Maximise opportunities to reduce car ownership, travel sustainably and improve air quality. Addressed under CP9.
 - Encourage proposals to deliver low-car/car-free housing in suitable locations. Addressed under CP9.
 - Be mindful of the various sources of flood risk and where possible implement sequential design through the site to reduce the flood risk and the consequences of flood risk. Addressed under CP11.
 - Seek the maximum reasonable amount of affordable housing. Addressed under CP20.
 - Provide construction job opportunities for local people, particularly where sites are situated within or near to areas of deprivation. Addressed under CP2 and SA6 and Development Area policies.
 - Consider the impact on adjacent listed buildings and conservation areas. Addressed under CP12 and CP13.
 - Ensure that a thorough impact assessment takes place to assess the impact of development proposals on the SDNP and its setting. Addressed through relevant policies.
 - Incorporate highly efficient water saving technologies. Addressed under CP8
 - Incorporate SUDS within new development and maximise opportunities for implementing biodiversity based SUDS. Addressed under CP8.
 - Maximise energy efficiency features. Addressed under CP8.
 - Be adaptable to the changing climate. Addressed under CP8.
 - Meet high environmental standards. Addressed under CP8.
 - Aim to facilitate reduction of waste. Addressed as far as possible under CP8 for operation stage and national and local policy for construction stage.
 - Reduce adverse health impacts associated with development and maximise positive impacts. Addressed under CP18.
- 7.03 In addition to this, some more specific mitigation relating to Development Areas was also proposed and in general the SA noted that the employment land needs and housing requirements of the city would need to be met, either through allocations in the City Plan Part 2, or through the Duty to Cooperate.

8.0 Recommended changes to policies

8.01 The Sustainability Appraisal made some recommendations for changes to existing policy wording, or for additional wording to some policies. There were few recommendations made at this stage and the SA noted that all the recommendations put forward during the previous assessment had been incorporated. The following table outlines the recommendations that were made and the reason for the recommendation.

Policy	SA objective and reason for change	Recommended change	City Plan Response
SS1	<p>There is no indication as to what criteria will be used to determine whether the policies in the Plan are considered to be “out of date” and as such, would trigger implementation of the latter part of the policy.</p> <p>It is noted that the presumption in favour of sustainable development does not apply to locations at risk of flooding and that at these locations the Sequential and Exceptions Tests still apply.</p> <p>It is noted that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitat Directives is being considered, planned or determined (NPPF s.119) and thus this policy will not be relevant in these situations. Nor does it apply to sites designated as AONB or SSSI (NPPF footnote 9).</p>	<p>It may be helpful to define this in the supporting text.</p> <p>It may be useful to highlight this in the supporting text.</p> <p>It may be useful to highlight this in the supporting text.</p>	<p>Further information not included.</p> <p>Footnote added with more details.</p> <p>Footnote added with more details.</p>
DA7	<p>SA Objective 7 & 19: Sites of natural form perform role in absorption of water, as well as helping maintain temperature. Policy could be strengthened through additional wording in supporting text.</p>	<p>Add to supporting text, following paragraph 3.77:</p> <ul style="list-style-type: none"> • Surface water run-off being controlled to maintain Greenfield run-off rates • On and off site tree-planting to help reduce the impact of urban heat island effect 	<p>Added as suggested</p> <p>Added as suggested</p>

9.0 Summary of Cumulative and Synergistic Impacts

9.01 The following matrix details the anticipated impacts of the area based policies on the sustainability objectives in the long term.

	Sustainability Objectives																					
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
DA1	+	-	+			-	+	-	+		++	++	-/+	+	+	+	+	+		-	+	-
DA2	-/+	--	-/+	+	++	--	-	-	+	--	++	++	-/+	+	+	+	+	+	--	-	++	-
DA3	+?	-	-/+	+	++	--	-/+	-	+		++	++	-/+	+	+	+	-/+	+	-/+	++	++	-
DA4	+	--	-/+		++	--	-	-	+		++	++	-/+	+	+	+	+	++	-	-	++	-
DA5	+	-	-/+		++	-	-	-	+		+++?	+++?	-/+	+	+	+	++	++	-/+	-	++	-
DA6	+	-	+		++	-	+	-	+		+++?	+++?	-/+	+	+	+	++	+	-/+	-	++	-
DA7	-?	-	+	+?	++	--	+?	+	?		++	++	+	+	+	+	-	+	-	++	+	-
DA8	-?	-	+	?	++	-	-/+	-	+	--	++	++	-/+	+	+	+	++	+	--	-	?	-
SA1	-/+	-/+	++	+	++	-/+	+	-	?	+	+	+	++	+	+		+	+	+	-	+	-
SA2	+?	-/+	++		+	-	-	-			++	++	-/+	+				++	-	-	+	-
SA3	++	++	++			++	+	-			+	+	++	++	+	++	+	+	+	-	++	-
SA4	+	+	+	++		+	++				+	+	+				+	+?	+		+	
SA5	++	+	++	++		+	++				+	+	+			+	+				+	
SA6	+	+	+		+	+	-	+	?		+	+	++	+	++	++	+	+	+	+	++	-

9.02 The following matrix details the anticipated impacts of the citywide policies.

	Sustainability Objectives																					
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
CP1	--	--	-/+?	--	++	--	--	-		-	+	+	++	+	+	+	+	+	-	-	+	-
CP2		-				-					++	++	+		+			+	+		+	
CP3	-/+?	-	-/+	-?	+	-/+	-	-/+	+?	-	+++?	+++?	+	+	+		+	+	-	-	+	-
CP4	-	-	+		-	-	-	-			++	++	+		+			+	-	-	++	-
CP5		-/+	+	+		-/+		+			++	++						+	+	+	+	-
CP6	-	+	+	+	+?	+	-	-			++	++					+	+	-	-		-
CP7	+	+	+	+	+	+	+	+		+	+	+	++	+	++			+	+		+	
CP8	++	+			-	+	+	++					++		+		+	++	+	++		+
CP9	?	+	?	?		+	?				+	+	+	+	+	+			?		++	
CP10	++	+	+	++			++			+			+				+		++			
CP11	-/+		+				++			++	+	+	+	+					++		+	
CP12	+	+	++	++		+					+	+	+	++	+			++		+	+	++
CP13	++	++	++			++					+	+	++	+	+	+	+		+		++	+
CP14	+	-	-/+	+	++	-	-	-		+	+	+	++	+	+		++	+	-	-	+	-
CP15			++	+				+			++	++				+			+			
CP16	++	+	++	++	-	+	++			+	+		++	+	+				++		++	
CP17	-	+	+		-	+	-	-			+		++	+	++	+	+	+	-	-	+	-
CP18	+	+	+			+							++	+	++	+					++	
CP19					++						+	+	++		+		+					
CP20	-	-	-		++	-	-	-		-	+	+	++	+	+	+	+	+	-	-	+	-
CP21	+	-/+	++	-/+?	++	-/+	+	-	+?	+	+	+	+	+	+?	+	+	+	-	+?	+	-
CP22	+		+	+	+		+						++	+		+					++	

9.03 When looking at these tables, particularly the impacts of the area-based policies, it is evident that there is potential for cumulative negative impact on some of the objectives. However, it is important that the different parts of the Plan are considered as a whole as the policies all work together. It is important, and can be seen from the second table, that the Citywide policies have scored positively against the majority of the Sustainability Objectives because these policies will set the context for the development and special area policies and will be used to minimise and mitigate any negative impacts resulting from the plan.

9.1 Summary of significant cumulative impacts

9.2 Significant Negative Impacts

- 9.21 Although there is the potential for a range of negative impacts, the most significant effects arising from the City Plan are those arising from delivery of housing and employment-based development.
- 9.22 One of the most significant effects arising from housing development and an increased population is the potential for an increase in car ownership. This may lead to an increase in journeys made by car throughout the city, although it is recognised that car ownership does not necessarily equate to trips made. Any increase in journeys made by car will have a direct impact on the local environment, through reduction in air quality and increase in road-related noise, and increased congestion, all of which can have an impact on health and safety. This will also have an impact on the wider environment, through the increase in emissions of greenhouse gases, therefore contributing towards climate change. An increased local population may also lead to an increase in journeys by other mode, e.g. by buses, which also have air quality impacts.
- 9.23 Other forms of development, such as sites for employment, increased retail provision and further tourist attractions may also increase journeys made by car, some of which will originate from outside the local area. Other employment related journeys may also increase, such as travel to work and deliveries serving local businesses, which can include freight or more polluting vehicles.
- 9.24 Despite the potential for an increase in car and other journeys, the Sustainability Appraisal noted the numerous positive references to sustainable transport within the Plan, and considered the policy requirements to be robust.
- 9.25 The delivery of at least 11,300 new homes in the city will put pressure on land available and there is likely to be competition between the need for different uses. Although the majority of dwellings can be situated within the built up area of the city on previously developed land, there is the identified need to develop Greenfield land to accommodate this requirement, as well as meet wider employment and other infrastructure needs. Development on any areas of Greenfield land has the potential for adverse impacts depending on its location, such as impacting upon the setting of the South Downs National Park, impacting on the underlying aquifer in terms of effecting water quality and quantity, and potentially reducing the city's ability to adapt to impacts associated with climate change such as increased rainfall and temperature. However it is recognised that with significant mitigation, there is the opportunity to gain positive outcomes to meet the city's needs from development in this location.
- 9.26 Another significant impact arising from development is the impact on natural resources, particularly water. Although the citywide policies require high environmental standards to be met, including minimising water consumption in new build, the city's overall water consumption will increase with the levels of development proposed. New development will also increase the need for energy, and it will be imperative that high building standards are achieved to ensure carbon levels do not increase.

- 9.27 The increased population arising from the levels of development will also increase pressure on local services and amenities, although it is recognised that certain types of services, such as schools, community and health facilities are specifically required in some policies to help meet identified areas of pressure. The increased population will also significantly increase the pressure on existing open space, which is already under-provided for in some areas of the city for the existing population. The requirement to increase provision of open space to meet the increasing population's needs is likely to prove difficult given the constraints of the city and competition between varying land uses.
- 9.28 The increased population arising, as well as the construction stages of development, will generate an increase in municipal and construction waste.

9.3 Significant Positive Impacts

- 9.31 There are a number of beneficial impacts arising from the City Plan.
- 9.32 The level of affordable housing in the city is currently below that required to meet local needs. Delivery of housing will increase the amount of affordable homes, provided that policy requirements relating to percentage of affordable housing to be delivered are met. This will benefit a wide range of the local population currently unable to access the housing they require, and have wider benefits including the potential for reduce housing-based deprivation. The Plan will enable some of the future housing needs to be accommodated at a level that takes into account the constraints of the city, however it is recognised that negotiations will be required under the Duty to Co-operate to fully meet the full amount of housing required locally.
- 9.33 The increase in the amount and type of employment land proposed, although lower than the amount assessed as required to meet the future needs of the city, is still considered to contribute towards increasing the employment capability of the city, will help to meet the needs of specific sectors that lack affordable and appropriate workspace, and will help to increase the attractiveness of the city to major employers, potentially leading to an increase in higher value job creation locally as well as helping support local economic growth. There is a risk that job-growth and the local economy may be constrained if the full employment floorspace requirements are not provided for, and this will need careful consideration in Part 2 of the City Plan. An increase in local employment floorspace may also have indirect benefits such as a reduction in out-commuting, reducing the need to travel and having wider environmental benefits.
- 9.34 The City Plan should lead to improvements in design, quality and sustainability of new build, with particularly high targets established relating to sustainable building design. This should help to reduce the carbon emissions resulting from all forms of new development, having wider environmental and social benefits and contribute towards reducing the city's carbon footprint.

- 9.35 The City Plan should lead to improvements in access to services, through investment and improvement in sustainable transport provision, through direction of development to areas with good transport links, through the protection of the hierarchy of town, district and local centres, and promotion of mixed use development in appropriate locations. In addition, should help to co-ordinate improvements that facilitate movement on foot or by bike in a range of areas throughout the city.
- 9.36 The implementation of the City Plan, particularly at the operational stage of development has the potential to bring about a range of health benefits, with all of the wider determinants of health being delivered. The policy's key benefits to health include improving choice and availability of housing; improving the cultural, historical, leisure and retail industries and associated income and employment opportunities; increasing access and accessibility through public transport and public realm improvements and increasing opportunities for physical activity; improving services and amenities and enhancing the built environment; and increasing and enhancing local biodiversity, greenways and open space. The policies also seek to deliver initiatives that will help to reduce deprivation, as well as deliver improvements to all neighbourhoods.

10.0 Monitoring

10.01 It is a requirement that the effects of the City Plan on the sustainability objectives are monitored. The following table shows the indicators proposed.

SA Objective	Indicator
1) To prevent harm to and achieve a net gain in biodiversity	Number and area of designated sites (SAC, SSSI, SNCI, LNR, AONB, RIGS).
	Percentage of area of SSSI land in (a) favourable condition (b) unfavourable recovering condition (c) unfavourable no change condition (d) unfavourable declining condition (e) area part destroyed / destroyed
	SQM of habitat or biodiversity features added or lost (citywide)
2) To improve air quality	Percentage of monitoring sites which indicate an improvement in levels of NO ₂ from previous year
	Percentage of monitoring sites which indicate that levels of NO ₂ exceed the National Air Quality Objective
	Change in extent of AQMA in Brighton & Hove
3) To maintain local distinctiveness	Number and % of Listed Buildings that are Grade 1 and 2*
	(a) on at risk register
	(b) subject to unauthorised alterations
	(c) subject to demolition
4) To protect, conserve and enhance the South Downs	(d) successful enforcement action
	Number of bus services that operate to the South Downs from Brighton & Hove
	Amount of land under:
	1) Entry level 2) High level environmental stewardship schemes
5) To meet the essential need for decent housing	Net additional homes completed.
	Net affordable housing completions.
6) To reduce the amount of private car journeys	Car ownership per household
	Annual average daily traffic flow: (a) Outer cordon sites: 5, 22, 608 and 620 (b) City centre cordon sites: 74, 800, 809, 813
	Annual average daily cycle flow: (a) National Cycle Route 2 sites: 957, 966 (b) National Cycle Route 90 sites: 960, 961
	Percentage of development where parking is provided for bicycles.
	Percentage of residential units delivered that are car-free
7) Minimise the risk of pollution	Status of the groundwater resource as measured by

SA Objective	Indicator
to water resources	the requirements of the Water Framework Directive.
	Quality of bathing water
	Percentage of new development incorporating SUDS within the development or beyond the development area.
8) Minimise water use in all development	Per capita domestic consumption of water
	Percentage of new development incorporating measures to reduce water consumption.
9) Promote the sustainable development of land affected by contamination	Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environmental Protection Act 1990
10) Manage coastal defences and minimise coastal erosion and flooding	Number of developments in a flood risk areas granted contrary to the advice of the Environment Agency
11) To balance the need for employment creation	Level of GVA per head
	Amount (£) of developer contributions secured for training for local residents, through the Local Employment Scheme
12) To support initiatives that combine economic development with environment protection	Proportion of VAT registered businesses per 10,000 population
	Percentage population that are in employment
13) To improve the health of all communities	Life expectancy at birth (males, females - years)
	Obesity among primary school in year 6 (percentage)
	Adult participation in sport (percentage)
	Under 18 conception rate
	Alcohol-harm related hospital admission rates (per 1000 population)
	Smoking quitters per 100,000 population
14) To integrate health and safety considerations	Number of total police recorded crimes.
	People killed or seriously injured in road traffic accidents
15) To narrow the gap between the most deprived areas and the rest of the city	Percentage of population living in the 20% most deprived super output areas in the country
	Percentage of population over 60 who live in households that are income deprived
	Tackling fuel poverty - Percentage of people receiving income based benefits living in homes with a low energy efficiency rating
	Percentage of young people who are not in employment, education or training (NEET);
	Percentage of non-decent council homes
16) To engage local communities in the planning process	Number of adopted DPDs or SPDs that have incorporated periods of public consultation
17) To make the best use of previously developed land	Percentage of new and converted dwellings on Previously Developed Land

SA Objective	Indicator
	Percentage of new employment development on Previously Developed Land
	Percentage of development situated on Greenfield land.
18) To maximise sustainable energy use	Kt of CO2 emitted from domestic sources for energy provision per capita
	Average annual domestic consumption of gas and electricity
	Average annual commercial and industrial consumption of gas and electricity
	Percentage increase in home energy efficiency
	Renewable energy generation.
19) To ensure developments have taken into account the changing climate	Percentage of new development incorporating green walls/roofs.
20) To encourage new developments to meet Code for Sustainable Homes or BREEAM standards	% of new non-residential development meeting the minimum standards as required by BH.
21) To promote and improve integrated transport links and accessibility	Percentage of development that allow good safe and direct access between the development and local schools, employment, shops GP surgeries and leisure facilities.
22) To reduce waste generation	Tonnes of Municipal Solid Waste produced per annum
	Tonnes of Commercial and Industrial Waste produced per annum
	Tonnes of Construction and Demolition Waste produced per annum
	Residual household waste per household
	Percentage of household waste: (a) recycled (b) composted (c) used to recover heat, power, and other energy sources
	Percentage of development providing facilities for recycling.

10.02 In addition to the monitoring indicators proposed for each of the sustainability objectives, implementation of the City Plan will also be monitored. The Sustainability Appraisal made suggestions for monitoring indicators to measure the impacts of the City Plan policies, some of which were carried forward, and can be found in the Monitoring & Implementation Annex.

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