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Brighton and Hove: Further Assessment of Urban Fringe Sites 2015 - Landscape and Ecological Assessments

Prepared by LUC
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1 Introduction

1.1 In August 2015, LUC was appointed by Brighton and Hove City Council (BHCC) to undertake detailed ecological and landscape assessments of some of the urban fringe sites to inform the preparation of Part 2 of the City Plan.

Background

1.2 Following Examination of The Brighton & Hove City Plan Part One (Submission Version, June 2013), the Council was required to undertake further assessment of the city's urban fringe sites to assess their potential for housing development This was required to help reduce the shortfall between the city's housing provision target and the Objectively Assessed Need for housing.

1.3 The Council therefore appointed LUC in 2014 to undertake an Urban Fringe Assessment[1] (2014 UFA) to investigate potential for housing from this source. The suitability of sites or parts of sites for housing were identified through an assessment of 'secondary' constraints, such as local nature conservation designations, historic designations, landscape character, open space designations and other environmental considerations including flood risk. Sites with absolute constraints, such as internationally or nationally designated nature conservation sites, or scheduled monuments, were omitted. An indicative number of dwellings per site was calculated using assumptions regarding development density. As a result, the study concluded that the urban fringe had the potential to accommodate an estimated 1,180 homes across 39 sites or parts of sites. 27 sites were identified as having no potential for housing development.

1.4 In November 2014 the Council consulted on Proposed Modifications to the Submission City Plan Part One, which included the urban fringe as a broad source of potential for residential development (Policy CP1 Housing Delivery and Policy SA4 Urban Fringe).

1.5 The Proposed Modifications to Policy SA4 included a commitment for the council to undertake further detailed assessment of the urban fringe sites identified as having potential for housing in the 2014 UFA. This would inform site allocations taken forward as part of the preparation of Part 2 of the City Plan (Site Allocations and Development Management Policies). This report presents the findings of this more detailed assessment with regards to landscape and ecology.

Aims of the Further Assessment 2015

1.6 Using the results of the 2014 Urban Fringe Assessment, Brighton & Hove City Council identified **20 Study Areas** for further landscape and/or ecology assessment in 2015. The majority of the Study Areas required both landscape and ecology assessments, whilst some required just one or the other. These Study Areas comprised either a single Urban Fringe Site as identified in 2014, or a cluster of such sites. Thirty-four Urban Fringe Sites were identified as requiring landscape assessment and 28 were identified as requiring ecological assessment. They were selected by the Council for further assessment on the basis of the potential for particular landscape or ecological sensitivity. In some cases additional sites were included as part of a cluster on the basis of their close proximity and the potential for them to form a single 'site'/Study Area.

1.7 The overall aim of the further assessment work, as stated in the Invitation to Tender, was to provide a more detailed landscape and ecology assessment of the Study Areas to assist in determining:

[1] LUC (2014) Brighton & Hove Urban Fringe Assessment

- *Whether the 'indicative area' where housing potential had been identified is broadly correct and can therefore be supported, or whether further assessment indicates that indicative areas need to be amended;*
- *Whether the density of development indicated is considered to be appropriate for the site and its surroundings or whether the further assessment indicates the density of development should be amended;*
- *Whether the mitigation identified is likely to be sufficient and/or feasible; whether additional or alternative site specific mitigation is likely to be required; and/or whether mitigation is not likely to overcome the adverse impacts identified.*

1.8 Further archaeological assessment has also been commissioned separately by the Council in 2015 which is reported elsewhere.

2 Method

Inception

2.1 An inception meeting was held to agree the scope and aims of the project and to ensure all data and background information was made available to inform the study.

Verification of Study Areas for Further Assessment

2.2 Brighton & Hove City Council identified 20 Study Areas, consisting of individual sites or clusters of sites for further detailed assessment. Sites were included based on the following:

- Sites where potential for adverse impacts on landscape had been identified in the 2014 UFA
- Sites where potential for significant adverse impacts on ecology had been identified in the 2014 UFA
- Sites which form part of a "cluster" which included sites where landscape or ecological sensitivity had been identified in the 2014 UFA
- Sites adjacent to either a Site of Nature Conservation Importance or Local Nature Reserve (for ecological assessment)

2.3 LUC were required to verify whether this was a robust approach for site selection, whether the most sensitive sites had been selected for further analysis, and whether any amendments may be required (for example, additional sites included or selected sites excluded). LUC reviewed the sites selected against the findings of the 2014 UFA and agreed with the approach taken by the council. **Appendix 1** provides the list of Urban Fringe Sites/Study Areas to be included for further landscape and ecological assessment in 2015.

Detailed Assessments of Study Areas

2.4 The following approaches were taken for the landscape and ecological assessments. Both the landscape and ecological assessments have been necessarily 'high level' given that no design proposals for each Study Area are available. Therefore, the development of any design proposals for the Study Areas should be informed by updated landscape and ecology input to inform design development, enabling the identification of impacts associated with specific schemes and the incorporation of appropriate mitigation proposals.

Landscape Assessment

Desktop Study

2.5 A desktop review was undertaken for each of the Study Areas, including constraints data gathered for the 2014 UFA, together with mapping analysis to identify potential key viewpoints; for example views from public open spaces, from adjacent roads and from/to the South Downs National Park.

Identification and Description of Effects

2.1 Each Study Area, with specific reference to the 'potential development areas' identified in the 2014 UFA, was assessed in the field and with subsequent desktop analysis. Sensitivity to development was assessed using the following seven criteria:

- **Physical character** addresses any sensitivity associated with landform, land cover and landscape elements. It considers the coherence, condition and intactness of the physical landscape, and the extent to which it is representative of typical landscape character, or a scarce landscape type in the local context;
- **Settlement form** considers the consistency of the area with the form and pattern of existing adjacent settlement, with reference to the character of the settlement edge and presence and role of boundary features;
- **Settlement setting** considers the extent to which an area contributes to the identity and distinctiveness of a settlement, by way of its character and/or its contribution to a perceived gap between settlements (the loss of which would increase coalescence);
- **South Downs National Park (SDNP) setting** considers the extent to which the area in question relates to the designated area, either through shared characteristics or qualities or through intervisibility;
- **Visual receptors** takes into consideration the visual character of the Study Area, including the extent of openness or enclosure and the importance of skylines, and the extent to which the landscape contributes to views from sensitive visual receptor locations, or to which development in this area would intrude on sensitive views. Locations used for recreation, such as public green space and rights of way, will typically be more sensitive than passing views from roads, and private views have less sensitivity than public viewpoints. Photographs are used to illustrate representative views from receptor locations;
- **Perceptual qualities** considers any scenic value, sense of rurality, remoteness or tranquillity associated with the Study Area;
- **Cultural and historic value** addresses the extent to which the landscape has 'time-depth' – a sense of being a historic landscape – and/or has cultural associations – e.g. features in art or literature, or is associated with an important historical figure.

2.2 Photographs have been provided for each Study Area to help illustrate the landscape character and issues. Where possible, this provides an indication of the location of the Study Area.

Evaluation and Recommendations

2.3 By considering these sensitivity criteria, and by using professional judgement to apply appropriate weight to them in each situation, the assessment aimed to provide an indication of whether significant adverse landscape effects would result from development in the locations, at the scale and density suggested in the 2014 UFA site appraisals.

2.4 Consideration was then given as to what, if any, measures could be taken to either reduce the potential adverse effects identified, or increase development potential without incurring likely significant adverse landscape impact.

2.5 This approach reflects that used in landscape and visual assessments carried out in accordance with the Guidelines for Landscape and Visual Assessment[2], but in the absence of specific development proposals this assessment can only be considered an *indication* of *potential* effects, and any forthcoming development proposal may require further assessment.

Ecological Assessment

Desktop Study

2.6 Biological records for each Study Area and a 1km buffer were obtained from the Sussex Biological Records Centre (data provided 18th August 2015), and data regarding designated sites was provided by the Council and publically available sources[3].

2.7 Additional records were provided by the Sussex Biological Records Centre on 15/12/2015 regarding the location of habitats identified as lowland calcareous grassland. This was used to determine the potential for this habitat to be present given the high level nature of the surveys, and issues such as access and management, which may otherwise hinder identification of

[2] LI and IEMA (2013) Guidelines for Landscape and Visual Assessment Version 3
[3] For example, www.magic.gov.uk

grassland habitats. It was not necessary to review other habitat/feature data held by the Sussex Biological Records Centre as these habitat/features were unlikely to be present within the sites (e.g. coastal habitats), were not subject to similar constraints regarding identification, and/or were available from other sources (see below).

2.8 A review of the following publically available resources was also undertaken:

- Multi-Agency Geographical Information for the Countryside (MAGIC) to identify statutory designated sites, and notable habitats such as Ancient Woodland.
- Ordnance Survey (OS) mapping;
- Aerial photography.

Phase 1 Habitat Survey

2.9 Phase 1 Habitat Surveys were undertaken between the 7th and 10th of September 2015 for each Study Area in accordance with current best practice guidance[4]. The surveys include the rapid classification of all habitats within the Study Area boundary, and the identification of dominant or characteristic flora or any notable species. Target notes were recorded, detailing species identified and a description of the habitats where appropriate (for example, signs of management, habitat structure or notable features identified). These are provided in **Appendix 2**. Field surveys were completed using hand-held survey devices, such as iPads with Phase 1 mapping software installed.

2.10 In addition to the classification of habitats, the survey was extended to include consideration of protected and/or notable species (for example, species of principle importance[5] or local BAP priority species). This included an assessment of habitat suitability as well as recording of any direct evidence noted during the survey, although detailed searches for such species, including notable flora, was not possible within the scope of the study. Current best practice methods were followed when considering the suitability of habitats for species. This also enabled the identification of potential constraints and opportunities for mitigation associated with the site (see below).

Evaluation and Recommendations

2.11 The assessments provide common names for species (where species have common names, otherwise scientific names are provided), with Appendix 3 providing the scientific names of all species mentioned in the text.

2.12 For each Study Area, the ecological features, or receptors (designated sites, habitats and/or species), were valued as far as possible given the extent of survey undertaken to determine their relative importance. This included consideration of the condition of the feature, for example particular quality of grassland areas. The approach to valuation was based on professional judgement as informed by tried and tested approaches, ensuring a robust and transparent assessment, including those produced by the Chartered Institute of Ecology and Environmental Management[6] and the British Standards Institute[7].

2.13 This valuation was considered alongside the potential for development impacts. The impact assessment was a high level assessment given the indicative nature of the potential development area proposals, e.g. based on the scale and density identified within the 2014 UFA site appraisals and was informed by professional judgement to provide an indication of likely impacts and the potential significance of these. This identified any requirements for avoidance measures or any mitigation which may be required to enable development to proceed in accordance with planning policy and nature conservation legislation (for example, requirements for species translocation).

2.14 Consideration was then given as to what, if any, measures could be taken to either reduce the potential adverse effects identified, or increase development potential without incurring likely significant ecological impact.

[4] JNCC (1991). Handbook for Phase 1 Habitat Survey

[5] As defined by the NERC Act, 2006

[6] Guidelines for Preliminary Ecological Appraisal and Ecological Impact Assessment guidance

[7] British Standards Institute (2013). BS42020:2013 Biodiversity – Code of Practice for Planning and Development.

2.15 In addition, potential requirements for further ecological surveys were identified, for example should potential for protected species be identified or should more detailed vegetation surveys be required. Such requirements are identified in the assessments where appropriate.

Limitations

2.16 While every attempt was made to collect accurate baseline data and carry out thorough site assessments, all ecological surveys represent a 'snapshot' of activity, and changing habitat conditions, including as a result of seasonal changes in vegetation or levels of habitat management, may increase or decrease suitability for faunal species. This will also affect the potential to identify plant species, particularly subject to the level of detail of surveys. For example at certain times of year when species are not flowering, or when management such as grazing is particularly intense, it may be necessary to undertaken very detailed surveys (such as National Vegetation Classification surveys) to identify certain plant species. Ecological features are dynamic and often transient and it is not always possible to confirm the absence of a species through survey. Ecological surveys can generally be considered as up-to-date for 1 to 3 years dependent on the nature of the site, ecological baseline, and proposals and likely impact. The level of survey undertaken for this study was appropriate to meet the objectives, but more detailed survey is likely to be required as development proposals come forward.

2.17 Wherever possible the entire Study Area was accessed for survey. However, this was not always possible given issues such as the presence of fencing or livestock, or locked access. If direct access was not available, areas were viewed as much as possible from adjacent land, with surveys supported by aerial photography. In these cases the assessments adopted a precautionary approach to ensure that potential issues were considered, ensuring a robust assessment suitable to support this study. This is described in each assessment, where relevant.

Conclusions

2.18 The conclusion reached for each Study Area sought to meet the objectives of the study, as highlighted in **Section 1**, namely whether the potential development areas identified were broadly correct, whether the densities of development indicated were appropriate, and to outline potential mitigation requirements.

2.19 For those Study Areas where both assessments were undertaken, the overall conclusions were developed through discussion between the landscape and ecological specialists. This enabled the development of combined conclusions to ensure that any conflicts (for example, locating development to avoid an area of high visual impact may result in impacts on a habitat of greater ecological value) were addressed, as were any opportunities for combined mitigation and enhancement.

2.20 In terms of ecological mitigation, measures were identified to address those issues considered most likely as identified by the Phase 1 Habitat Survey. However, detailed surveys (including species surveys) would be required to support development proposals, and these must be used to inform the development of specific mitigation requirements.

2.21 The overall conclusions were summarised in a table (see **Table 24.1, Section 24**).