

Erratum

Please note the site address for site reference 31 has been corrected as there was an error in the original version. For information the original version detailed the site address as “land east of Whitehawk Road”. This has been amended throughout the document to read “land east of Whitehawk Hill Road”



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Brighton & Hove Urban Fringe Assessment

Final Report

Prepared by LUC

June 2014

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Contents

1	Executive Summary	1
2	Introduction	3
	Study aims	3
	Context and key issues	3
3	Methodology	8
	Approach	8
	Study methodology	8
4	Assessment Findings	14
	Overall findings	14
	Spatial distribution of housing potential	14
	Masterplanning and wider community benefits	16
	Looking further ahead	16
	Considering potential for Local Green Spaces	17
5	Strategic Issues and Implications	18
	Wider sustainability implications	18
	Investment in outlying communities – opportunities for regeneration	18
	Residual impacts on green infrastructure and open space	18
	Meeting the longer term housing requirement	19
Appendix 1		20
	Assessment Assumptions	20
Appendix 2		29
	Example Proforma	29
Appendix 3		31
	Schedule of Sites	31
Appendix 4 (published separately)		
	Site Maps and Proformas	
Tables		
Table 1 – Data sets		9
Table 2 – Open Space Standards as outlined in Policies CP16 and CP17 of the City Plan		10
Figures		
Figure 1 – Brighton and Hove’s Urban Fringe Sites and the minimum and maximum area required to meet the city’s objectively addressed housing need		7
Figure 2 - Key to symbols and colour coding used in judging likely effects		11
Figure 3 – Spatial distribution of urban fringe areas with potential to accommodate residential development		15

1 Executive Summary

Context

- 1.1 LUC was appointed by Brighton and Hove City Council to assess the potential contribution of the city's urban fringe sites to accommodate additional residential development. This assessment builds upon the Council's earlier urban fringe assessments; it explores in more detail the positive and negative effects of development in the urban fringe and estimates more robustly the potential number of homes that it could accommodate.

Method

- 1.2 Sites affected by 'absolute constraints', such as national environmental designations, utility infrastructure and cemeteries were identified and discounted in the first instance. All other urban fringe sites were screened for 'secondary constraints', which can potentially be more easily mitigated.
- 1.3 Visits were made to all accessible urban fringe sites to determine whether residential development might be appropriate and, if so, the density and type of development that would be most suitable. A proforma (see **Appendix 2**) was used to record site characteristics and describe each site's secondary constraints and the potential adverse/positive effects of development both before and after mitigation. Judgements were based on clearly defined assumptions outlined in **Appendix 1**. Each proforma estimates the total number of dwellings each site could potentially accommodate and the density and height of development.

Findings

- 1.4 Sixty six urban fringe sites were assessed. Five sites were excluded from further assessment because they are completely covered by 'absolute' constraints.
- 1.5 The summary findings for the remaining 61 sites are set out in the accompanying schedule (see **Appendix 3**) and in a detailed site proforma for each site (see **Appendix 4**).
- 1.6 Overall, the study identified that the city's urban fringe has the potential to accommodate an estimated **1,180 homes**. This represents 26% of the minimum shortfall (4,500 homes) or 15% of the maximum shortfall (8,100 homes) in objectively assessed housing need predicted over the plan period. **Thirty nine sites** are identified as having some potential for housing development, covering **31ha or 7.5% of the total area of the urban fringe sites**. Twenty seven sites are identified as having no potential for housing development. Significant pockets of potential capacity were found in the west, north and south of the city; however the east has more limited potential due to a number of key constraints in the area.
- 1.7 A masterplanning approach is recommended for four clusters of sites with potential to accommodate residential development: sites 4, 4a, 4b, 5, 5a and 6 at **Mile Oak**; sites 21 21a and 21c at **Coldean**; sites 38, 38a and 39 at **Ovingdean Farm**; and sites 48, 48a, 48b and 48c near **Coombe Farm**.

Looking further ahead

- 1.8 Sites 34 and 35 known collectively as 'Sheepcote Valley' have been identified as being worthy of further consideration as longer term potential opportunities. However, no potential has been identified as part of this study due to the need for further significant detailed investigation and remediation work regarding the valley's historic land use as a landfill site.
- 1.9 Four areas are identified as having potential for designation as 'Local Green Spaces' through the preparation of Part 2 of the City Plan. These are the 'green wedges' into the urban area, which act as wildlife corridors and important routes for people wishing to access the South Downs:
 - Benfield Valley – sites 10, 11 and 12.

- Three Cornered Copse – site 14.
- Ladies' Mile – sites 17 and 17a.
- Hollingbury Park – site 18.

1.10 However, in weighing up the case for designation it will be important to consider the benefits of greater protection for these spaces against any potential impacts on other open spaces which are not similarly designated.

Strategic Issues and Implications of the Study

1.11 Accommodating housing in the urban fringe will contribute towards the objectively assessed need for housing in the city. It will also benefit the wider local economy and present opportunities for investment and regeneration in the more outlying communities of the city, both around the main urban area, and at the edges of the 'satellite' settlements to the east. This could include improvement to existing community facilities (including public open space) as well as providing opportunities to improve connections between these areas and the core urban areas (e.g. at Whitehawk), or within and between existing and new open spaces and out to the National Park. This investment has the potential to result in wider economic, environmental and social (e.g. health and wellbeing) benefits for the city and not just individual communities.

1.12 The individual and cumulative effects of significant residential development on movement and transport in and around the city will need to be carefully considered in the Council's updated Transport Assessment.

1.13 Developing on existing open space in the urban fringe will inevitably result in a cumulative net loss of open space to the city. However, the losses must be set against opportunities linked with new development to open up currently inaccessible open spaces to public access and provide new, usable spaces for local communities.

Meeting the longer term housing requirement

1.14 Despite the study finding potential for the urban fringe to accommodate around 1,200 new dwellings, there remains a significant shortfall in the city's objectively assessed housing need.

1.15 We understand that the City Council has already looked hard at the main urban area, which will provide opportunities through the re-use and regeneration of developed sites. The council keeps this source of potential under regular review through its annual residential monitoring exercise and annual updates of its Strategic Housing Land Availability Assessment (SHLAA).

1.16 Other sites in the urban fringe, such as Sheepcote Valley, may provide longer term opportunities for housing. This is dependent on overcoming significant existing constraints, such as land contamination, or exploring the possibility that some current uses in the urban fringe could be satisfactorily and sympathetically relocated elsewhere (e.g. within the South Downs National Park).

1.17 As part of its 'duty to cooperate', the City Council should continue to work with neighbouring Districts and the South Downs National Park, on a sub-regional basis, to identify future options for housing development.

2 Introduction

Study aims

- 2.1 LUC was appointed by Brighton and Hove City Council to assess the potential contribution of the city's urban fringe sites to accommodate additional residential development – and thereby help to meet the city's housing requirements. Measures to protect sensitive receptors, mitigate significant adverse effects and enhance the urban fringe were considered.
- 2.2 The purpose of the assessment was to build an objectively assessed evidence base that will identify the potential contribution of the city's urban fringe towards housing supply. It will also assist in identifying those areas which should be protected from development; for example as designated Local Green Spaces.
- 2.3 The brief was to thoroughly explore, and make recommendations on:
 - a) **The potential contribution of the city's 66 urban fringe sites to accommodate residential development** and the forms of residential development which might be particularly suitable.
 - b) **The extent to which some urban fringe sites should remain protected**, including scope for new designations, such as Local Green Spaces, where justified by national planning policy.
 - c) **The scope for and role of mitigation** in minimising adverse effects of development and the nature and extent of any residual adverse effects.
 - d) Linked with c), **the potential for sites to generate additional benefits** for the city in relation to other strategic objectives, such as:
 - o Increasing the quality, quantity and range of community facilities and services, including public open space.
 - o Conserving, connecting and enhancing multifunctional green spaces, including biodiversity enhancement.
 - e) Mechanisms **for bringing forward sites suitable** for residential development.

Context and key issues

- 2.4 This assessment builds upon the Council's earlier urban fringe assessments; it explores in more detail the positive and negative effects of development in the urban fringe and estimates more accurately the number of homes that it could accommodate.

Brighton and Hove

- 2.5 The city of Brighton and Hove is a vibrant centre of culture and commerce. Covering an area of 8,267 hectares, the city limits are bordered by two of South East England's most valued and defining features – the South Downs and the English Channel – both assets to the city but also physical constraints on development.
- 2.6 By 2030, the city aims to become a strong and prosperous, sustainable, an attractive and healthy place; a regional centre for creativity; and an established regional and European meeting destination¹. To achieve these aims the Submission City Plan includes a number of strategic goals which include maximising the city's sustainable design integrity, improving the range, mix and tenure of housing available to local residents, and increasing green infrastructure for biodiversity,

¹ Brighton & Hove Submission City Plan Part One, February 2013, Brighton & Hove City Council

sustainable transport, recreation and linkages between the city and South Downs National Park. A positive and practical assessment of the city's urban fringe assessment will make an important contribution towards identifying developable sites that will contribute to these goals.

Meeting the housing requirement

- 2.7 Brighton & Hove's population, currently around 275,000², is growing fast. The number of households in the city increased by 6.2% between 2001 and 2011 and around 6.7% of households (8,150) were recorded as overcrowded³. The city's objectively assessed housing need has been assessed as falling between 16,000 – 20,000 new homes⁴ from 2010 to 2030. This represents 28.5% of the combined housing need of the Coastal Sussex Housing Market Area⁵ to which the city belongs. The Coastal Sussex 'Housing Duty to Co-Operate Study' also identified strong affordability pressures within the city, estimating that 72% of households have insufficient income to afford market housing and indicating a 'backlog' of housing need of some 7,890 households⁶.
- 2.8 Much of the city's housing supply potential lies within the city's existing built up urban area; however, residential densities are already high (often between 60-200 dwellings per hectare). Brighton and Hove's Submission City Plan Part 1⁷ planned to deliver 11,300 new homes within the plan period (2010 – 2030). This represents a 'shortfall' against objectively assessed housing requirements of between 4,500 and 8,100 fewer homes than required. To date, despite constructive and continued dialogue with the city council's neighbouring authorities, none has offered to help the city meet its objectively assessed housing need.

Section 110 of the Localism Act (2011) inserted section 33A into the Planning and Compulsory Purchase Act (2004) introducing a '**Duty to Cooperate**' that requires Local Authorities to work with neighbouring authorities, statutory consultees, Local Enterprise Partnerships and Local Nature Partnerships in preparing local plans.

Paragraphs 178-181 and 156 of the National Planning Policy Framework (NPPF) outline relevant cross boundary issues to be considered under the 'Duty to Cooperate': homes and jobs needed in a geographical area; infrastructure projects; retail, leisure and other commercial developments; social infrastructure; and landscape and the natural and historic environment.

The city shares much of its urban fringe with the South Downs National Park. As the assessment of the city's urban fringe, its sensitivities, values and capacity to accommodate residential development, is linked to all these cross-boundary issues, the Council has a duty to cooperate with neighbouring authorities, in particular the South Downs National Park.

The city's urban fringe

- 2.9 Much of the land around the city (40%) falls within the South Downs National Park, where large scale housing development is not possible. The Submission City Plan does not include land within the National Park as the National Park Authority will be preparing its own Local Plan. This study therefore focussed on the land falling between the existing densely built up area of the city and the National Park – described as 'urban fringe sites'.
- 2.10 One sixth of the city is designated for nature conservation, including Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Sites of Nature Conservation Importance⁸ (SNICIs), as well as the South Downs Way Ahead Nature Improvement Area (NIA).

² Census, 2011

³ 2011 Census Briefings, Brighton and Hove City Council, 2013

⁴ Brighton & Hove Housing Requirements Study, June 2011, GL Hearn

⁵ Coastal Sussex Housing Duty to Co-Operate Study, May 2013, GL Hearn.

⁶ Matter 4A: Housing, Statement by Brighton & Hove City Council, October 2013

⁷ Brighton & Hove Submission City Plan Part One, February 2013, Brighton & Hove City Council

⁸ Many of the city's SNICIs have now been reviewed and will go forward under a new designation as 'Local Wildlife Sites' in Part 2 of the City Plan.

- 2.11 Much of the city's urban fringe meets the National Planning Policy Framework's definition of open space and represents a significant proportion of the city's open space and green infrastructure. Green infrastructure⁹ is a strategic term for green space used in the National Planning Policy Framework. There is not enough open space to meet the requirements of the city's existing and growing population¹⁰. The Submission City Plan Part 1, Policy CP16, highlights the need to provide in excess of 200 hectares of additional open space by 2030 in order to meet the requirements of the city's increasing population. Other pockets of the urban fringe, whilst not formally designated as open space, are highly valued by residents and may have the potential to be designated as 'Local Green Spaces' in Part 2 of the City Plan.

Paragraphs 76-78 of the NPPF provide for green spaces of demonstrable local significance, either for their beauty, tranquillity, richness of wildlife, historic or recreational value, to be designated as '**Local Green Spaces**', providing protection consistent with that of national Green Belt policy. Local Green Spaces must be in reasonably close proximity to the community that values them; local in character; and not extensive tracts of land.

Local Green Space designations should contribute to the planning of sustainable development. Therefore, they must complement rather than inhibit other community needs, such as homes, jobs and essential public services.

- 2.12 The capacity of the city to support residential development within the urban fringe is made even more complex by:
- The steep topography and/or limited accessibility of some sites.
 - The need for significant remediation of some sites prior to development, potentially limiting their viability and suitability for housing, for example, Sheepcote Valley an ex-landfill site.
 - Some sites are already developed, accommodating important infrastructure such as water reservoirs and telecommunications.

Brighton and Hove City Council City Plan Part 1

- 2.13 Brighton and Hove City Council formally submitted the City Plan Part 1¹¹ and accompanying documents for examination in June 2013. The Submission City Plan Part 1 put forward a housing delivery target of 11,300 new homes for the plan period 2010 – 2030. With the city's objectively assessed housing need falling within a range of 16,000 – 20,000 new homes¹² – this represents a shortfall of at least 4,500 homes.
- 2.14 Using Policy CP14's (Housing Density) minimum net density to be achieved (50 dwellings per hectare), Figure 1 overleaf illustrates the area of Brighton and Hove's urban fringe that would be required to meet the city's minimum (4,500 homes; or 90ha) or maximum (8,100 homes; or 162ha) shortfall in housing over the plan period 2010 – 2030. This represents a significant area of land and would represent a significant loss of the city's green infrastructure resource.

Examination in Public

- 2.15 The Examination in Public (EiP) hearing sessions were held October 2013. The appointed Planning Inspector raised some concerns before the EiP regarding the Council's own assessment of land within the urban fringe, specifically the assessment's focus on 'perceived constraints' rather than opportunities to mitigate adverse impacts on relatively less constrained sites.
- 2.16 The Council's urban fringe assessment (September 2013) identifies 64 sites¹³, 11 of which were identified as having some potential for small-scale residential development, accommodating an estimated overall capacity of around 100 residential units. The other sites were deemed to be unsuitable as they form part of the city's green infrastructure network, either in terms of the city's

⁹ 'A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'. National Planning Policy Framework, 2012.

¹⁰ Open Space, Sport and Recreation Study, October 2008, PMP

¹¹ Brighton & Hove Submission City Plan Part 1, February 2013, Brighton and Hove City Council

¹² Brighton & Hove Housing Requirements Study, June 2011, GL Hearn

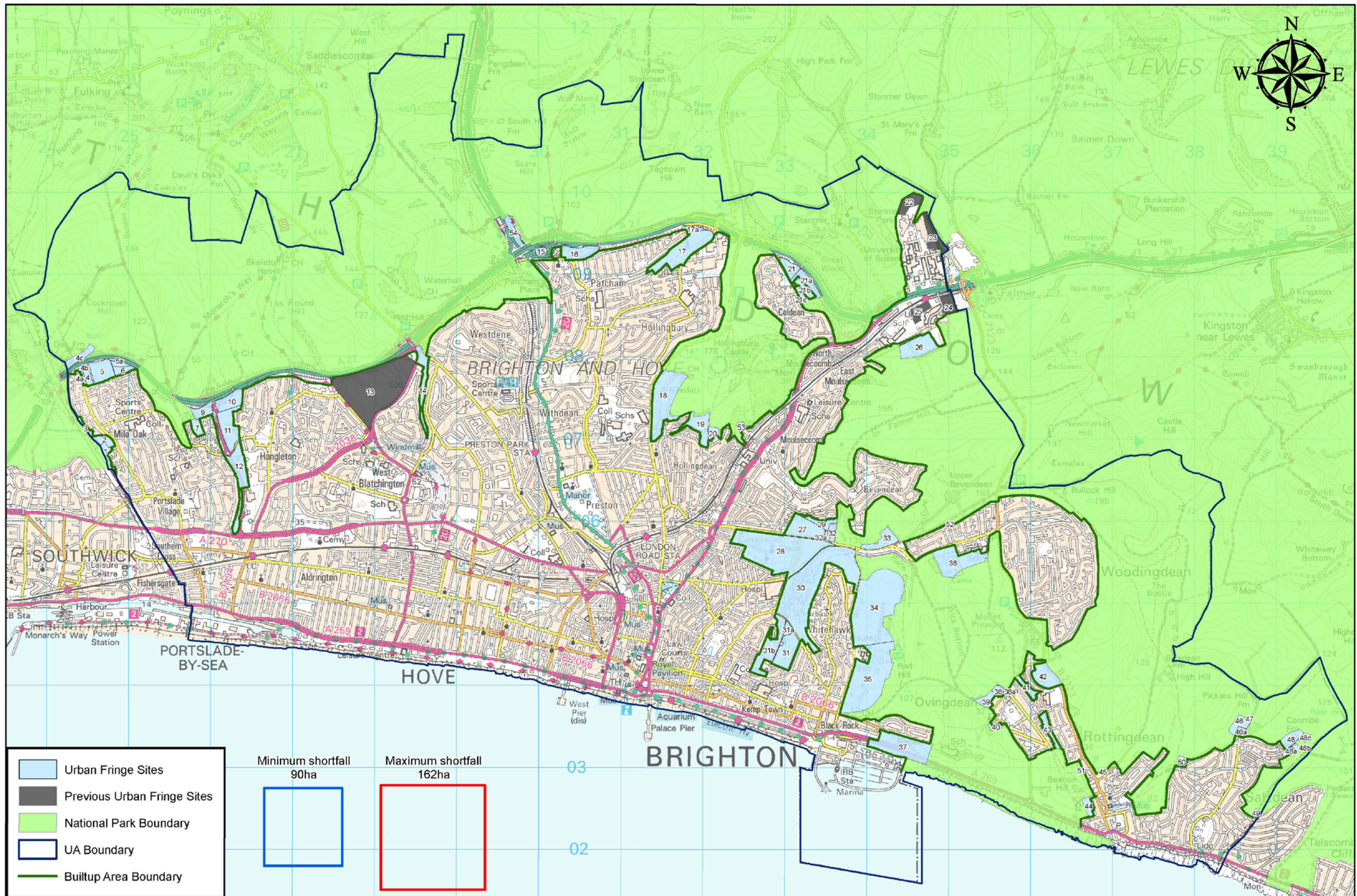
¹³ This study assesses 66 urban fringe sites in total; two additional sites were included to ensure complete coverage of the urban fringe.

open space framework or biodiversity resource, or were constrained by land uses, contamination and topography. Understandably, with an overall shortfall in open space, the Council had given significant weight to the NPPF policy¹⁴ to protect existing open spaces and its biodiversity resource.

- 2.17 At the EiP hearing sessions a number of participants, including two with site specific interests, criticised the Council's urban fringe assessment on the grounds that it was not sufficiently robust in assessing all reasonable alternatives or evaluating the positive social benefits of residential development at the urban fringe. In December 2013, the Council received a letter from the City Plan Inspector outlining initial conclusions on specific soundness issues. It was the Inspector's view that, due to the significant housing shortfall against the city's objectively assessed requirements, the City Plan had failed to meet the social dimension of sustainable development. The Inspector therefore indicated that more should be done to rigorously assess opportunities to increase the housing target. The Inspector suggested that two sources of supply should be revisited: windfall provision and urban fringe sites. This study addresses the second of these sources.

¹⁴ Paragraph 74, National Planning Policy Framework, HM Government, 2012

Urban Fringe Sites



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Figure 1 – Brighton and Hove’s Urban Fringe Sites and the minimum and maximum area required to meet the city’s objectively addressed housing need¹⁵

¹⁵ Estimates of the areas of land required to meet the City’s housing shortfall are based on the minimum housing density of 50 dwellings per hectare required in the City by Policy CP14. (Base map prepared by Brighton and Hove City Council, 2013.)

3 Methodology

Approach

- 3.1 The overall approach involved identifying different levels and types of constraint on residential development in the urban fringe. 'Absolute' constraints included national designations (e.g. Sites of Special Scientific Interest (SSSIs), Ancient Scheduled Monument (ASM)) and land uses upon which new development would not be suitable (e.g. cemeteries, reservoirs). 'Secondary' constraints (as outlined in the following sections) have more potential for mitigation of negative impacts.
- 3.2 Base maps were used to identify all levels of constraint. The areas of the urban fringe with no 'absolute' constraints together with all those performing functions such as open or green spaces were screened for secondary constraints, and the likely effects of residential development was assessed both before and after mitigation.
- 3.3 Visits were made to all the urban fringe sites to determine whether residential development might be appropriate (unless access was impossible) and, if so, the density and type of development that would be most suitable. The assessment was used to arrive at an estimate of the likely number of dwellings the urban fringe of Brighton and Hove could contribute to housing supply.

Study methodology

- 3.4 The remainder of this section describes the study method and individual tasks in more detail.

Task 1: Data Collection and Mapping

- 3.5 Brighton and Hove City Council made available all the data collected as part of the 2013 Urban Fringe Assessment (Update September 2013). LUC used this data as a starting point, building on it so that our work complemented rather than duplicated the work already carried out by the Council.
- 3.6 The first task involved collecting all the relevant data sets. **Table 1** outlines the data that has been used in the assessment.
- 3.7 All collected information on each site was included in a proforma for each urban fringe site, along with all other useful information collated by Brighton and Hove Council as part of the previous study.

Table 1 – Data sets

Ecological Designations
Special Areas of Conservation
Ancient Woodland
Sites of Special Scientific Interest
South Downs Way Ahead Nature Improvement Area
Sites of Nature Conservation Importance
Local Nature Reserves
Higher Level Stewardship Land
Historic Designations
Scheduled Monuments
Registered Parks and Gardens
Conservation Areas
Listed Buildings
Archaeological Notification Areas
Open Spaces
Outdoor Sports Facilities
Parks and Gardens
Children’s Equipped Playspace
Amenity Greenspace
Allotments
Natural and Semi-Natural Greenspace
Cemeteries and Graveyards
School Grounds and Playing Fields
Brighton Racecourse
Golf Courses
Potential Food Growing Sites (to meet One Planet Living Objectives)
Public Rights of Way, including potential links and gateways to the South Downs National Park
Environmental issues
Topography
Areas susceptible to groundwater and surface water flooding
Local Geological Sites, or formerly Regionally Important Geological and Geomorphological Sites (RIGGS)
Contaminated Land and Hazardous Waste Sites
Agricultural Land Classifications
Landscape Character
South Downs National Park Integrated Landscape Character Assessment (Areas A2: Adur – Ouse Downs & R2: Brighton to Rottingdean Shoreline)

Task 2: Absolute Constraints

- 3.8 The following designations were considered ‘absolute’ constraints, i.e. areas of land unsuitable for residential development either because of particular designations or because there are environmental issues and/or land uses which mean that development would not be suitable:
- Scheduled Monuments.
 - Special Areas of Conservation.
 - Sites of Special Scientific Interest.
 - Cemeteries and graveyards.
 - Reservoirs.
- 3.9 Any part of the urban fringe sites containing these designations or land uses were excluded from further assessment. Where appropriate, effects on the settings of Scheduled Monuments, Special Areas of Conservation or Sites of Special Scientific Interest were considered as part of the secondary constraints mapping exercise.

Task 3: Assess Open and Green Spaces

- 3.10 Access to the South Downs National Park, which wraps around the city, does not necessarily compensate for local deficiencies in other types of open space. Much of the city's urban fringe meets the National Planning Policy Framework's definition of existing open space and as such represents a significant proportion of the city's open space and green infrastructure resource. Other pockets of the urban fringe, whilst not formally designated as open space, may be highly valued by residents and some may have the potential to be designated as 'Local Green Spaces' in Part 2 of the City Plan.
- 3.11 In correspondence with the Council, the City Plan Examination Inspector expressed concerns that the Council's decision to protect some sites from development because of their open space/recreational value was not always supported by the Council's own assessment of the existing or potential for such uses. This part of the assessment sought to address this concern directly.
- 3.12 Following the exclusion of areas of the urban fringe containing 'absolute' constraints, we used the Council's Open Space, Sport and Recreation Study (2008) and the Open Space Study Update (2011) to identify those areas of the urban fringe performing the function of open and green space.
- 3.13 The city's open and green spaces include playing fields, school grounds, golf courses, cemeteries and graveyards and the racecourse, as well as the following open space typologies which have an assessed standard:
- Outdoor Sports (e.g. Sports pitches/Playing fields).
 - Allotments.
 - Parks and Gardens.
 - Children's Equipped Playspace.
 - Natural/Semi-natural Green Spaces.
 - Amenity Greenspace.
- 3.14 Using the same resources and the open space standards outlined in the Submission City Plan Part 1 we identified local outlying areas of the city known to have insufficient access to good quality open space and, conversely, any areas with over provision, expressed by ward. Where over provision was identified, the reason for this was examined and a view taken regarding the ability of the open space to meet the needs of people in a wider area, including areas of deficiency.

Table 2 – Open Space Standards as outlined in Policies CP16 and CP17 of the City Plan

Open Space	Quantity Standard (Ha per 1,000 Population)	Accessibility Standard (m)
Parks and Gardens	0.92	720
Natural/Semi-Natural Greenspace	2.8	720
Amenity Greenspace	0.582	480
Allotments	0.23	720
Children's Equipped Playspace	0.055	720
Outdoor Sports Facilities	0.47	960

- 3.15 The findings of the open space studies were reflected in the assessment e.g. where sites are of high quality (and value), or in need of improvement (which could be secured through some

development). In view of the very limited ability to meet the future city-wide open space requirements, the importance of retaining reasonably level spaces for outdoor sports pitches and facilities was taken into account.

Task 4: Assessment of Secondary Constraints and Mitigation

- 3.16 Secondary constraints included factors or areas sensitive to development, but where development might be able to take place if appropriate mitigation is provided. **Appendix 1** contains a list of secondary constraints and our assumptions relating to the significance of effects both before and after mitigation. The assumptions outline the clear circumstances that would be likely to lead to positive, negative and negligible effects.

Proforma

- 3.17 A proforma was used to record site characteristics and basic data for each urban fringe site. The proforma described the site's secondary constraints and the potential adverse/positive effects of development before and after mitigation. An example proforma can be found in **Appendix 2**.
- 3.18 A simple appraisal matrix was used to summarise the assessment of effects of development in urban fringe sites on each secondary constraint, both before and after mitigation. A colour coding system was used and each score is accompanied by a brief commentary explaining the reasoning behind the assessment of effects.

Figure 2 - Key to symbols and colour coding used in judging likely effects

++	Development of the site is likely to have a significant positive effect.
+	Development of the site is likely to have a minor positive effect.
0	Development of the site is likely to have a negligible or no effect .
-	Development of the site is likely to have a minor negative effect.
--	Development of the site is likely to have a significant negative effect.
+/-	Development of the site is likely to have mixed minor positive and minor negative effects.
++/-	Development of the site is likely to have mixed significant positive and minor negative effects.
+/--	Development of the site is likely to have mixed minor positive and significant negative effects.
?	Effects are uncertain.

- 3.19 Ideally, measures should be adopted to avoid creating impacts from the outset; for example through the careful siting of development to avoid affecting sensitive receptors. Where avoidance is not possible, measures to minimise impacts are the preferred alternative. For example, the sensitive layout, design and landscaping of development can minimise its impact on the surrounding character of an area. Finally, it may be possible to compensate for any residual adverse effects through restoration of land in the immediate vicinity or through the enhancement of ecological and heritage assets in neighbouring urban fringe sites (or elsewhere).
- 3.20 **Appendix 1** provides some examples of mitigation measures which may be appropriate. These will vary according to the site location, character, assets affected, and type of development, and as such the examples provided are not exhaustive.
- 3.21 Column 1 of the proforma (see **Appendix 2**) records our assessment of effects on secondary constraints before mitigation, assuming development of the whole site.
- 3.22 Column 2 records our assessment of effects on secondary constraints post-mitigation. In making this assessment we assumed that national and local planning policies would seek to mitigate significant negative effects of all development through the sensitive siting, layout, landscaping and design requirements (or other mitigation measures appropriate to the environmental asset). A score is given for the judged effect of developing the portion of the site considered most

appropriate for residential development under each issue – ecology, heritage, open space, landscape and other environmental issues – i.e. mitigation may be applied to avoid or minimise effects by directing development to the least sensitive part of the site. This may vary according to the issue being considered. The judgements for each topic are then brought together to provide an overall conclusion for each site.

Site visits

- 3.23 Potential effects on landscape features and character were assessed through the site visits and the assumptions outlined in **Appendix 1**. All sites were visited by an experienced landscape planner. Notes on the topography in and around each site, the scope for screening of views and the existing density of development at the urban edge were made on site to inform final judgements. The sites' visibility in relation to nearby heritage features was also considered.
- 3.24 Where development was considered potentially acceptable post mitigation, the site visits also helped to identify the type and density of residential development which might be most appropriate in each site.

Considering wider benefits/positive effects

- 3.25 We considered whether the development of sites (or parts of sites) for housing (assumed to benefit the city as a whole) would provide the opportunity to secure other benefits/ positive impacts such as improved open space or recreation facilities for local communities. The site visits proved useful for identifying where there could be other benefits; for example, from reconfiguring uses across clusters of sites or providing better public access to open spaces and the wider South Downs National Park.

Potential Local Green Space Designations

- 3.26 With reference to paragraph 77¹⁶ of the NPPF, open spaces with potential for designation as Local Green Spaces were identified.

Identifying housing numbers

- 3.27 Following the site visits, the likely residual effects (after mitigation) of development were verified and refined for each site. We then made recommendations as to how many dwellings each site might be able to accommodate, where appropriate (i.e. this may be zero).
- 3.28 Recommendations relating to the density and height of development were based on the site visit notes describing the topography in and around each site, the scope for screening significant views and the existing density of development at the urban edge. The following residential types were considered¹⁷:
- Low density dwellings – 25 low-rise detached dwellings per hectare.
 - Medium density dwellings – 50 low-rise terraced dwellings per hectare.
 - High density – 75 dwellings per hectare, e.g. flats.
- 3.29 An estimate of the total number of dwellings each site would be likely to accommodate is provided within each proforma.
- 3.30 An indicative number of dwellings per site was calculated using similar assumptions outlined in the Brighton and Hove City Plan Part 1 in relation to net dwelling density. This indicates that the calculations should include *'only those site areas developed for housing and directly associated uses, including access roads within the site, private garden space, car parking areas, incidental open space and landscaping and children's play areas, where these are provided.'*¹⁸

¹⁶ Paragraph 77 of the National Planning Policy Framework states the: *'designation will not be appropriate for most green areas or open spaces and should only be used where the green space is in reasonably close proximity to the community it serves; where the green area is demonstrably special to a local community and holds a particular local significance, i.e. for beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land'*.

¹⁷ The minimum housing density of 50 dwellings per hectare required in the City by Policy CP14 of the City Plan has been taken to be the average in the highly constrained and variable urban fringe sites and 25 dwellings added to and taken away from the average to reflect high and low densities, respectively. Policy DA7 – Toad's Hole Valley, City Plan Part 1, which requires housing densities of 50-75 dwellings per hectare, has also been used as a guide.

¹⁸ Policy CP14 – Housing Density, City Plan Part 1, Brighton and Hove City Council, 2013.

- 3.31 Further technical work will need to be undertaken to assess whether any of the urban fringe sites identified as having housing potential could accommodate traveller sites.

4 Assessment Findings

Overall findings

- 4.1 Sixty six urban fringe sites were assessed, by means of desk-based analysis of constraints and site visits. Five sites were excluded from further assessment because they are completely covered by 'absolute' constraints, including:
- Scheduled Monuments.
 - Special Areas of Conservation.
 - Sites of Special Scientific Interest.
 - Cemeteries and graveyards.
 - Reservoirs.
- 4.2 The summary findings for the remaining 61 sites are set out in the accompanying schedule (see **Appendix 3**) and in a detailed site proforma for each site (see **Appendix 4**). Some parts of these sites also include absolute constraints; however, the remaining area of such sites were considered further against the secondary constraints.
- 4.3 Overall, the study has identified that the city's urban fringe has the potential to accommodate an estimated **1,180 homes**. This represents 26% of the minimum shortfall (4,500 homes) or 15% of the maximum shortfall (8,100 homes) in objectively assessed housing need predicted over the plan period. **Thirty nine sites** are identified as having some potential for housing development, covering **31ha or 7.5% of the total area of the urban fringe sites**. Twenty seven sites are identified as having no potential for housing development.

Spatial distribution of housing potential

- 4.4 Figure 3 illustrates the spatial distribution of areas of the urban fringe with potential to accommodate residential development. The urban fringe assessment identified five notable areas with potential to accommodate significant numbers of dwellings:
- West – up to **280 dwellings** to the north of Mile Oak in sites 4, 4a, 4b, 5, 5a and 6 and up to **125 dwellings** to the west of Benfield Valley at site 9 Hangleton Bottom (however this site is an allocated site for waste development in an up to date development plan).
 - North – up to **140 dwellings** to the north east of Coldean in sites 21, 21a and 21c.
 - South – up to **150 dwellings** in the north western part of the Whitehawk Estate in site 30 and up to **50 dwellings** to the south west of the estate in site 31.
 - East – up to **50 dwellings** to the west of Ovingdean in sites 38, 38a and 39.
 - East – up to **55 dwellings** to the north of Saltdean in sites 48, 48a, 48b and 48c.

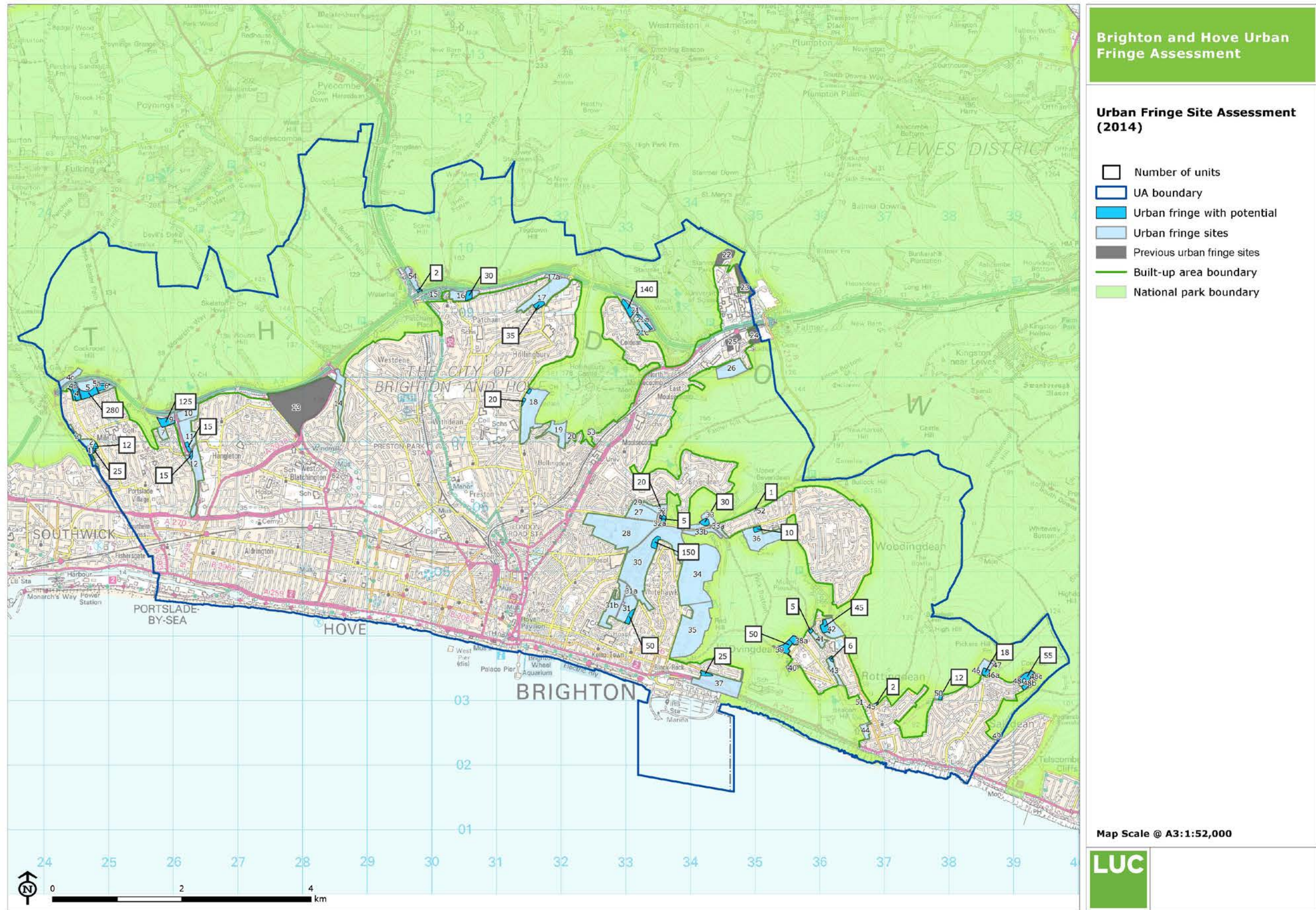


Figure 3 – Spatial distribution of urban fringe areas with potential to accommodate residential development

- 4.5 Collectively, these sites represent 72% of the total capacity of the city's urban fringe to accommodate residential development.
- 4.6 The urban fringe sites to the east of the city have more limited potential for residential development. This lack of potential can be attributed to a number of key constraints in the area, including the Sheepcote Valley landfill site to the east, Brighton Racecourse, Whitehawk Hill Ancient Scheduled Monument and two large city cemeteries. Furthermore, much of the area boasts panoramic views of the wider South Downs National Park and the English Channel to the south making the area more sensitive from a landscape perspective. The sites in and around Benfield Valley to the north of Hove and those around Hollingbury to the north of Brighton also have limited potential due to the significant role these areas play as valued viewpoints, formal and informal open spaces and green corridors or 'fingers' for wildlife and residents to move between the heart of the city and the South Downs National Park.

Masterplanning and wider community benefits

- 4.7 By definition, urban fringe sites are furthest from the city's central services and facilities. A number of sites in outlying areas of Brighton and Hove would benefit from the investment that would need to accompany new housing development, such as at Whitehawk (e.g. to improve infrastructure provision and pedestrian and cycle links to the west under the racecourse), Patcham (e.g. to improve provision of open space facilities such as sports fields), and Mile Oak (e.g. to provide more accessible open space alongside new development).
- 4.8 By consolidating clusters of sites with housing potential, these areas can be master planned to incorporate new open spaces and other green infrastructure, sustainable transport routes, and other new community facilities as appropriate; all of which will also benefit the wider area.
- 4.9 A **masterplanning approach**¹⁹ has therefore been recommended for four site 'clusters': sites 4, 4a, 4b, 5, 5a and 6 at **Mile Oak**; sites 21, 21a and 21c at **Coldean**; sites 38, 38a and 39 at **Ovingdean Farm**; and sites 48, 48a, 48b and 48c near **Coombe Farm**.

Looking further ahead

- 4.10 Two larger sites have been identified as being worthy of further consideration as longer term potential opportunities (for example, through a review of the City Plan), but which are subject to significant development and feasibility/viability constraints. These are sites 34 and 35 known collectively as 'Sheepcote Valley'. Determining whether there is any housing potential on these sites would require a significant amount of further detailed investigation, particularly regarding the treatment of significant contamination. There are uncertainties regarding risk to future users due to landfill gas and potential contaminants associated with extensive and uncontrolled landfill over an extended historic period that need thorough investigation. No potential is identified as part of this study.
- 4.11 No assumptions have been made about the potential to increase the capacity of sites to accommodate housing development by 'displacing' certain uses, such as allotments and playing fields (or the racecourse), into the South Downs National Park. Such considerations are outside the remit of this study and would be entirely dependent upon future discussions with the National Park Authority as the local planning authority (as part of the Duty to Co-operate). Accessibility and sustainable transport considerations would be key to any such discussions.

¹⁹ Clusters of sites with potential for development rely on one another to fulfil their collective potential. This is best achieved through a masterplanning approach whereby development is consolidated in the areas of the cluster that are likely to have the least overall negative effects and mitigation and enhancement measures targeted to those areas of the cluster where they are likely to have the greatest positive effects. In such areas, the sum total area of land suitable for development within the cluster has been reduced to 75% of the total area to provide a more accurate estimate of the total indicative capacity of each cluster and the City's urban fringe as a whole.

Considering potential for Local Green Spaces

- 4.12 The urban fringe sites contain some of the city's most important ecological habitats, sensitive landscapes and accessible open spaces, including access routes to the South Downs National Park. In assessing their relative sensitivity and value, it has been possible to identify sites with the potential to be considered for designation as 'Local Green Spaces' through the preparation of Part 2 of the City Plan.
- 4.13 Paragraphs 76-78²⁰ of the NPPF state that green spaces of demonstrable significance as local havens for beauty, tranquillity, richness of wildlife, historic or recreational value can be designated as 'Local Green Spaces', provided that they are in reasonably close proximity to the community that values them, are local in character and do not constitute extensive tracts of land.
- 4.14 Four areas are identified as having potential for designation as 'Local Green Spaces' through the preparation of Part 2 of the City Plan. These are the 'green wedges' into the urban area, which act as wildlife corridors and important routes for people wishing to access the South Downs:
- Benfield Valley – sites 10, 11 and 12.
 - Three Cornered Copse – site 14.
 - Ladies' Mile – sites 17 and 17a.
 - Hollingbury Park – part of site 18.

²⁰ Paragraph 76-78, National Planning Policy Framework, HM Government, 2012

5 Strategic Issues and Implications

- 5.1 This section reflects on some of the strategic spatial planning issues and implications of accommodating housing development in the urban fringe of Brighton and Hove, and puts the findings of the study into this wider context. In particular, it reflects on:
- Wider sustainability implications of development
 - Investment in outlying communities – including opportunities for regeneration
 - Residual impacts on green infrastructure and open space
 - Thinking ahead – meeting the longer term housing need of the city

Wider sustainability implications

- 5.2 Providing new housing has clear benefits for existing communities in terms of helping to meet housing need, both for market housing and more affordable homes, as well as for those moving to the city to live and work. Accommodating housing in the urban fringe will contribute towards the objectively assessed need for housing in the city. It is also clear that providing new housing benefits the wider local economy, and will present opportunities for regeneration which are considered further below.
- 5.3 The spatial distribution of housing development around the urban fringe, and in particular, several opportunities in the north west of the city, may have implications for movement and transport within and around the city, which has been outside the remit of this study. These individual and cumulative effects will require further consideration by the City Council. It is understood that an updated Transport Assessment is being undertaken by consultants for the council which will include looking at the impacts of additional residential development on the city's urban fringe.

Investment in outlying communities – opportunities for regeneration

- 5.4 The location of the urban fringe sites bring opportunities for investment in the more outlying communities of the city, both around the main urban area, and on the edges of the 'satellite' settlements to the east. This will provide opportunities for regeneration and improvement of existing community facilities (including public open space), where this is required, as well as providing opportunities to improve connections between these areas and the core urban areas (e.g. at Whitehawk), or within and between existing and new open spaces, and out to the National Park. This investment has the potential to result in economic, environmental and social (e.g. health and wellbeing) benefits.
- 5.5 These benefits are reflected within the conclusions of individual site assessments, but it is important to recognise there would be wider benefits for neighbouring communities, and the city as a whole.

Residual impacts on green infrastructure and open space

- 5.6 Developing on existing open space in the urban fringe will inevitably result in a cumulative net loss of open space to the city. However, set against the losses are opportunities linked with new development to open up currently inaccessible open spaces to public access, and provide new, usable spaces for local communities.

- 5.7 Brighton has a number of 'green wedges' of open space which link the core of the urban area with the National Park, and provide opportunities for recreation and sustainable access, as well as providing a green backdrop to these urban areas. These locations are particularly important in the wider context of the city, and several have local community groups associated with caring for them. We have identified parts of these areas as having potential for designation as Local Green Spaces, for further consideration by the City Council. However, in weighing up the case for designation it will be important to consider the benefits of greater protection for these spaces against any potential impacts on other open spaces which are not similarly designated.

Meeting the longer term housing requirement

- 5.8 The study concludes that the urban fringe has the potential to accommodate around 1,200 new dwellings and to make an important contribution to the objectively assessed need for housing in the city. However, there remains a significant shortfall.
- 5.9 We understand that the City Council has already looked hard at the main urban area, which will provide opportunities through the re-use and regeneration of developed sites. The council keeps this source of potential under regular review through its annual residential monitoring exercise and annual updates of its Strategic Housing Land Availability Assessment (SHLAA).
- 5.10 Other sites in the urban fringe may provide longer term opportunities for housing, provided that significant constraints can be overcome (this relates in particular to Sheepcote Valley) or in the event that some current uses could be satisfactorily relocated elsewhere.
- 5.11 As part of its 'duty to cooperate', the City Council should continue to work with neighbouring Districts and the South Downs National Park, on a sub-regional basis, to identify future options for housing development. For example, there may be scope to increase the capacity of Brighton and Hove's urban fringe by 'displacing' certain uses, such as allotments and playing fields into the South Downs National Park. There is also a need to build on the good work already happening at the sub-regional level and look more strategically to identify the best options for accommodating new homes across the wider sub region.

Appendix 1

Assessment Assumptions

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
Ecology		
<p>On site / Off site: South Downs Way Ahead Nature Improvement Area; Site of Nature Conservation Importance; Local Nature Reserve; Ancient Woodland; Higher Level Stewardship Land</p> <p>Off site: Special Area of Conservation; Site of Special Scientific Interest.</p>	<p>There is not a fixed distance at which biodiversity sites may be affected by new development, as the habitats and species for which biodiversity sites are designated are different, and different types of effects can be transmitted across different distances (e.g. air or water pollution may travel much further than noise or disturbance from physical presence of humans or dogs). Therefore, it is not possible to determine actual effects on the structure and function of habitats and populations of species. However, as an indication of potential effects on protected habitats and species from residential development the following assumptions have been applied.</p> <p>Development on greenfield land is likely to have a minor negative effect (-?) against biodiversity as development would result in a net loss of greenspace.</p> <p>All sites adjacent to internationally and nationally designated biodiversity sites, i.e. a Special Area of Conservation (SAC), and Sites of Special Scientific Interest (SSSIs) will be assessed as potentially having a significant negative (--?) effect on biodiversity.</p> <p>Sites containing areas of the South Downs Way Ahead Nature Improvement Area (NIA) are assumed unlikely to have effects on the overall NIA.</p> <p>For sites within locally designated biodiversity sites, such as Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and</p>	<p>The potential negative effects on ecological designations could be mitigated by the following paragraphs in the National Planning Policy Framework (NPPF): 61, 81, 99, 109, 111, 113, 114, 117, 118, 119, and 192.</p> <p>Area-based policies within the proximity of the urban fringe could require land to be set aside for environmental enhancements to offset and mitigate the negative effects associated with new construction, increases in residents and recreation in the surrounding countryside.</p> <p>Negative ecological effects may be avoided, or reduced, by focussing development in areas with limited ecological value or away from sensitive habitats and species.</p> <p>It is assumed that all developments would incorporate an element of provision for biodiversity assets, which may help to create new habitats and contribute to habitat connectivity; therefore residential development could have minor positive (+?) effects on all sites, resulting in residual mixed effects (+/-? or +/-?) overall. Such provisions might include the construction of green roofs, bird boxes, tree planting, the creation</p>

²¹ Assumes the whole site would be developed.

²² Assumes sensitive location and layout, and, therefore, in some cases, partial development of the site.

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
	<p>Sites of Nature Conservation Importance (SNCIs), and Ancient Woodland, it is assumed new development is likely to have a significant negative effect (--?) on biodiversity.</p> <p>Where sites are adjacent to locally designated biodiversity sites, such as Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Sites of Nature Conservation Importance (SNCIs), and Ancient Woodland, new development is likely to have a minor negative effect (-?) on biodiversity.</p> <p>In all cases, effects are uncertain as the potential for effects will depend on the exact nature and design of the new development, as well as the exact details of the ecological value of the site, including presence / absence of protected / notable species. Opportunities to enhance biodiversity through appropriate design and the incorporation of biodiversity enhancement measures, or other measures off site such as translocation, are likely to exist on most urban fringe sites.</p>	<p>of wetlands or improvements to hedgerows and wild flower meadows.</p> <p>The reasons for designating internationally and nationally designated ecological sites and their sensitivities will be reviewed to determine whether active and ongoing measures could protect or mitigate adverse effects on sensitive species and habitats. Enhancement measures will also be considered.</p> <p>Where there is scope for mitigation measures on potential development sites adjacent to international and national ecological designations the overall significance of effect will be downgraded from a significant negative effect (--?) to a minor negative effect (-?) and acknowledged potential for enhancement measures would result in a mixed minor positive/minor negative effect (+/-?) overall.</p> <p>Where there is scope for mitigation measures on potential development sites containing local ecological designations the likely effect will be downgraded from (--?) to a minor negative effect (-?) and acknowledged potential for enhancement measures would result in a mixed minor positive/minor negative effect (+/-?) overall.</p> <p>Where there is scope for mitigation on all other urban fringe sites, including those adjacent to local ecological designations, the likely effect will be downgraded from (-?) to a negligible effect (0?) and acknowledged potential for enhancement measures would result in a minor positive effect (+?) overall.</p> <p>Where there is no scope for mitigation and</p>

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
		<p>enhancement measures the scores will remain the same as those pre-mitigation.</p> <p>Again, in all cases, effects are uncertain as the potential for effects will depend on the ecological value of the site which would need to be assessed as part of any planning application (including ecological surveys as appropriate) and the exact nature and design of the mitigation and enhancement measures applied (informed by ecological surveys, as necessary, and having regard to the mitigation hierarchy).</p>
Heritage		
<p>Scheduled Monument; Registered Park and Garden; Conservation Area; Listed Building; Archaeological Notification Area</p>	<p>English Heritage bases its definition of the setting of a heritage asset on the previous national Planning Policy Statement 5, as <i>“the surroundings in which [the asset] is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral”</i>²³.</p> <p>As an indication of potential effects on heritage assets from housing development, the following is assumed:</p> <p>A significant negative effect (--?) may occur where a site is within or adjacent to, i.e. within the curtilage of a Scheduled Monument, Grade I and II* Registered Park and Garden, Listed Building or Conservation Area²⁴.</p> <p>A minor negative effect (-?) is likely to occur where a site sits</p>	<p>The potential negative effects could be mitigated by the Core Planning Principle in the NPPF (at para.17): <i>‘conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations’</i>. And the following paragraphs in the NPPF: 61, 55, 126 – 141.</p> <p>Development management policies should signpost developers to cultural heritage designations and listings and the national policies that protect and conserve their setting.</p> <p>Development designed and organised around existing heritage designations has the potential to mitigate any significant negative effects to minor negative (-?) and even enhance the setting of</p>

²³ English Heritage. The Setting of Heritage Assets REVISION NOTE June 2012.

²⁴ Although Conservation Areas are not a national designation, the designation has national significance once adopted.

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
	<p>within a local designated Archaeological Notification Area or there is acknowledged potential for significant archaeology within the immediate vicinity of the site.</p> <p>An indication of archaeology potential has been provided by the County Archaeologist.</p> <p>Sites that are not within or directly adjacent to known heritage assets or areas with acknowledged archaeological potential will be judged to have a negligible (0?) effect on cultural heritage. However, this score will be reviewed during the site visits. Where a known heritage asset can be viewed from a site, the overall score will be revised to a negative effect (-? or --?) overall.</p> <p>In all cases, effects are uncertain as the potential for effects are unknown until on-site archaeological investigation occurs and will depend on the exact nature and design of development. Opportunities to enhance the historic environment through appropriate, siting design and layout are likely to exist on most urban fringe sites.</p>	<p>some heritage assets resulting in mixed negative and positive effects (+/-?) overall. Building designs can incorporate key architectural features and materials that contribute to the character of heritage assets and the wider landscape. Reflecting existing dwelling densities and patterns of green space are also important ways of retaining the character of a place.</p> <p>However, development of sites on or within the curtilage of national heritage designations, such as a Scheduled Monument, Grade I and II* Registered Park and Garden, Listed Buildings and Conservation Areas (which have national significance) are likely to have mixed minor positive and significant negative effect (+/--?) overall.</p> <p>Local policies require assessment, appropriate recovery and recording of potential archaeological assets to mitigate any loss of the archaeological record, particularly within Archaeological Notification Areas. Mitigation may result in mixed minor negative and minor positive effects (+/-?) overall.</p>
Open Space		
<p>Outdoor Sports Facilities²⁵; Allotments; Natural/Semi-natural Green Spaces; Parks and/or Gardens, Children's Equipped playspace, Amenity Greenspace</p>	<p>The development of sites containing existing outdoor sport facility, public park and/or garden, children's equipped playspace or allotment would result in a significant negative (--) effect as such open spaces are generally well used, difficult to re-locate and replace if lost.</p> <p>Sites wholly or partially owned by the public, or privately owned spaces recognised as publically accessible open space, that contain natural/semi-natural greenspace or amenity</p>	<p>Need to explore whether negative effects could be mitigated and overall provision of open space enhanced through the following Core Planning Principles in the NPPF (paragraph 17): <i>"take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs"</i> and <i>"encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land</i></p>

²⁵ For the purposes of this study, this will include School Playing Fields, the Brighton Race Course and Golf Courses.

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
	<p>greenspace are accessible to the public and perform an open space function. Loss of such green space would result in a significant negative effect (--) on open space provision.</p> <p>Privately owned sites containing natural/semi-natural green space or amenity greenspace are not legally accessible to the public; however they may be used for some informal recreation. Therefore, loss of such greenspace would result in a minor negative effect (-) on open space provision.</p> <p>Sites not containing identified open spaces or identified as 'Countryside' in the BHCC Urban Fringe Assessment (2013) will be scored negligible (0). 'Countryside' is not designated open space in the Council's Open Space Strategy.</p> <p>It is assumed that all existing links and gateways to the South Downs National Park will be retained within development sites that have such access, resulting in no negative effects overall.</p>	<p><i>can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)",</i> and the following paragraphs in the NPPF: 73 – 77.</p> <p>Development Management policies should ensure open space is provided as part of major residential developments, which could include incorporating existing open spaces into the design of the development.</p> <p>Further local strategic or area based policies on local services and facilities could ensure that new development contributes to the improved accessibility and diversity of local open space provision, either via S106 agreements or CIL contributions.</p> <p>It is assumed that, where possible, all residential development would retain access to publically owned open spaces, mitigate for any loss of such open space and mitigate for the increased demand for such open space arising from new development and increased population density.</p> <p>However, in the constrained urban fringe, it might be difficult to replace all existing publically accessible open spaces on all sites, particularly open spaces that require reasonably flat land such as children's playgrounds, allotments, playing fields and sports pitches. Therefore, where sites containing publically accessible open spaces (including privately owned spaces recognised as publically accessible open space) cannot safeguard their existing size and quality, a significant negative effect (--) will be retained.</p> <p>With the exception of playing fields and sports pitches which, due to a lack of flat land in the city, there is a city-wide shortage, sites containing</p>

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
		<p>publically accessible open spaces for which there is current and predicted over provision in the area score +/- in recognition of their capacity to be improved or replaced with open spaces for which there is an under provision in the area (+) and the more minor negative effect (-) associated with their specific redevelopment, i.e. a net loss of publically accessible open space overall.</p> <p>Where sites can safeguard the existing size and quality of publically accessible open space, improve facilities and accommodate increased demand for such spaces, positive effects will be recorded.</p> <p>Public sites that contain areas not recognised as open space or privately owned and inaccessible natural/semi-natural greenspace or amenity greenspace in areas of existing or predicted under provision are likely to increase public access to open spaces and help to provide for more useable/diverse open space with significant positive effects (++)). Sites containing privately owned and inaccessible natural/semi-natural greenspace or amenity greenspace in areas of existing or predicted over provision for such open spaces are likely to have a minor positive effect (+) as there is less need for natural/semi natural greenspace and amenity greenspace.</p>
Landscape		
<p>South Downs National Park (setting); role of urban fringe as downland setting of city; wider landscape role of urban fringe.</p>	<p>No land within the South Downs National Park will be assessed, as this lies outside the City Plan area.</p> <p>Before mitigation, all development in the urban fringe is likely to have at least a minor negative effect on landscape character and/or views either to or from the South Downs National Park / city.</p> <p>Potential significant negative (--) effects on landscape</p>	<p>Potential negative effects could be mitigated by the Core Planning Principle in the NPPF: <i>'contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework'; 'take account of the different roles and character</i></p>

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
	<p>character, or setting, will be recorded on potential development sites that possess the same landscape character as the neighbouring South Downs National Park's Open Downland.</p> <p>Where the special qualities of this landscape (i.e. colour, texture, tranquillity, remoteness) are already screened or obscured by vegetation or topography, these potential significant negative effects (--) will be downgraded to minor negative effects (-).</p> <p>Where the special qualities of this landscape (i.e. colour, texture, tranquillity, remoteness) are already compromised by urbanising influences, these potential significant negative effects (--) will be downgraded to negligible effects (0).</p> <p>Where the special qualities of this landscape (i.e. colour, texture, tranquillity, remoteness) are retained and not obscured by vegetation, urbanising influences or topography, these potential significant negative effects (--) will be retained.</p> <p>Where the site has an important local landscape role, e.g. as a green valley / 'finger' into the city, development will be assumed to have a significant negative effect (--).</p>	<p><i>of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it'; and the following paragraphs in the NPPF: 61, 109 – 125 and 192.</i></p> <p>Area-based policies should have regard for the urban fringe's qualities and those of the South Downs National Park as outlined in the Parks Landscape Character Assessment.</p> <p>Appropriately-scaled and screened development has the potential to retain the character of areas of open downland adjacent to the South Downs National Park. Adverse landscape effects can sometimes be avoided by lowering height of dwellings so that they do not affect key views. In addition, the retention and enhancement of existing tree-lines or new tree planting can be an important way of minimising adverse landscape effects.</p> <p>Some parts of a site may be less sensitive than others by virtue of their location in relation to one or more of the following:</p> <ul style="list-style-type: none"> • the existing urban edge • existing screening/containing vegetation • existing landform. <p>Restricting development to the least sensitive parts of a site could minimise the significance of negative effects from significant (--) to minor (-) or minor (-) to negligible (0).</p> <p>Potential development sites in particularly open parts of the urban fringe, i.e. sites that frame important views to and from the South Downs</p>

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
		<p>National park and lack urbanising influences, are unlikely to be able to mitigate the significant negative effects of development and their original score (--) will be retained.</p> <p>Where existing urbanising influences have an adverse effect on landscape character it may be possible for new development in the urban fringe to mitigate this, potentially resulting in minor positive effects (+) overall.</p>
Other Environmental Issues		
Groundwater/ Surface Water Flood Risk Areas	<p>Development on sites that are within areas of high flood risk may have negative effects:</p> <p>Potential development sites in which 25% of the land area is at risk from ground and/or surface water flooding are assumed to have a significant negative (--) effect.</p> <p>Potential development sites of which between 5-25% are at risk from ground and/or surface water flooding are likely to have a minor negative (-) effect.</p> <p>Potential development sites with less than 5% of their land within areas at risk from ground and surface water flooding are assumed to have a negligible (0) effect.</p> <p>The opportunity to incorporate SuDS to mitigate the risks of surface water flooding and surface/ground water contamination is good practice and assumed to be part of the design of all residential development regardless of flood risk and in addition to the more site specific mitigation measures considered in column 2.</p>	<p>The potential negative effects could be mitigated by the Core Planning Principle in the NPPF: <i>'support the transition to a low carbon future in a changing climate, taking full account of flood risk..'</i>, and the following paragraphs in the NPPF: 94, 99-104, 109, 110, 156 and 166.</p> <p>All residential development should be targeted to the areas of lowest flood risk (i.e. flood zone 1, and outside areas prone to ground and surface water flooding), resulting in negligible effect overall (0).</p> <p>Where there are no significant flood risks identified in the urban fringe sites there are no opportunities to generate positive effects through mitigation as a result of new development.</p> <p>Where there is a risk of surface water flooding on the site, development would be required to ensure surface water run-off rates are at least reduced to existing green-field levels through the incorporation of sustainable urban drainage systems (SUDS), therefore reducing a potential (--) or (-) score to a negligible effect overall (0).</p> <p>Where there is a risk of groundwater flooding on the site, development would be required to</p>

Secondary Constraints	Assumptions: Pre-Mitigation ²¹ ,	Assumptions: Post-Mitigation ²²
		incorporate design features to mitigate against the flood risk (e.g. no basement dwellings) to reduce the score to a negligible effect overall (0).
Local Geological Sites (formally RIGS)	Urban Fringe sites that include a Local Geological Site are assumed to have a minor negative (-) effect as there is potential to lose their value.	Potential development sites containing Local Geological Sites are likely to have a negligible (0) effect based on the assumption that residential development would be sited to avoid their loss and to enable continued access.
Contaminated Land	<p>If $\geq 25\%$ of a site is situated on contaminated land then a significant negative effect is likely (--).</p> <p>If less than $< 25\%$ of a site is situated on contaminated land, then a minor negative effect if likely (-).</p> <p>Contaminated land may not be suitable for residential development. However, remediation should be investigated to explore potential for development. Depending upon development viability, redevelopment may be a useful catalyst for financing such remediation and may contribute to compensating some of the long-term adverse impacts of residential development.</p>	<p>Potential negative impacts could be mitigated by the Core Planning Principle in NPPF, para. 17: <i>'contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this framework'</i>; and following paragraphs in NPPF: 109, 120, 121, 143, 166 and also 94, 99, 110 and 156 due to potential impacts on climate change and water supply.</p> <p>If an urban fringe site is on contaminated land, remediation would be a required condition of any new housing development, resulting in significant positive effects (++) . Redevelopment may be a useful catalyst for financing such remediation where development viability is positive.</p>

Appendix 2

Example Proforma

Urban Fringe Site:

Location:

Site Area:

Secondary Constraints and Mitigation Assessment			
<p>Map – A map illustrating the constraints located within / adjacent to the site will be prepared.</p>			
<p>Summary of Former BHCC Urban Fringe Assessment Findings (September 2013) – Summary of previous urban fringe assessment conclusions.</p>			
<p>Site Characteristics – Land use, access issues, agricultural land classification etc.</p>			
Effects on Secondary Constraints		Effects Post Mitigation	
Ecology			
<p>Commentary on sensitive receptors and their proximity to the site (potential residential development). Judgement based on the assumption that the entire site would be developed.</p>	<p>e.g. --</p>	<p>Nature of mitigation/enhancement and the level likely to be required, resulting in residual effects post mitigation.</p> <p>Judgement based on the assumption that the most appropriate portion of the site would be developed – this may be the whole site or part of the site, and may vary for each issue. The most appropriate portion for each issue is the area of the site that is likely to have the least negative and/or most positive effect on the relevant sensitive receptor/asset.</p>	<p>e.g. +</p>
Historic Environment			
Open Space			
Landscape			
Other Environmental Issues			
Overall Conclusions			
<p>Commentary summarising the area(s) within each site appropriate for residential development and, drawing on the site visit's landscape and visual assessment, concluding what dwelling type (and density) would be most appropriate within the site. The suggested areas (ha) for development would be outlined in the section below.</p>			
Dwelling Type	Area (ha)	Location in Site	
Low density, e.g. detached dwellings – 25 per hectare			

Secondary Constraints and Mitigation Assessment

Medium density, e.g. terraced dwellings – 50 per hectare		
High density, e.g. multi-storey dwellings/flats – 75 per hectare		

Appendix 3

Schedule of Sites

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
1	Land at Oakdene, Southwick Hill	2.25	Ecology; Open Space; Landscape	Yes	Yes	1 (44%)	Low	25	25
2	West of Mile Oak Road, Portslade	2.5	Ecology; Open Space; Landscape	Yes	Yes	0.5 (20%)	Low	12	12
3	Oakdene, Upper Paddocks, South Wick Hill	1.15	Ecology; Open Space; Landscape; Topography; Access	No for Ecology	No	0 (0%)	N/A	0	0
4	Land at Mile Oak Road, Portslade	1.71	None	N/A	Yes	1.5 (88%)	Medium	75	Limited to 5.6ha (280 dwellings)
4a	Land at Mile Oak Road, Portslade	0.55	Flooding	Yes	Yes	0.5 (91%)	Medium	25	
4b	Land at Mile Oak Road, Portslade	0.63	Flooding	Yes	Yes	0.5 (79%)	Medium	25	

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
4c	Land at Mile Oak Road, Portslade (north of A27)	3.38	Absolute Constraint: Reservoir; Utilities; Landscape	No	No	0 (0%)	N/A	0	across the cluster of sites 4-6.
5	Land at Mile Oak Hill, Portslade	6.89	Ecology; Landscape	Yes	Yes	3.5 (51%)	Medium	175	
5a	Land at Mile Oak Hill, Portslade	1.24	Ecology; Open Space; Flooding	Yes	Yes	0.5 (40%)	Medium	25	
6	Land at Mile Oak allotments, Portslade	2.07	Open Space; Flooding	Yes	Yes	1 (48%)	Medium	50	
7	Foredown Allotments, Thornbush Crescent, Portslade	2.31	Ecology; Open Space	No for Open Space	No	0 (0%)	N/A	0	0
9	Land at Hangleton Bottom, Portslade	3.37	Flooding	Yes	Yes	2.5 (74%)	Medium	125	125
10	Benfield Hill, Benfield Valley	5.65	Ecology; Heritage; Open	No for Ecology,	No	0 (0%)	N/A	0	0

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
			Space; Landscape	Open Space and Landscape					
11	Benfield Valley, north of Hangleton Lane	8.75	Ecology; Heritage; Open Space; Landscape	Yes	Yes	0.75 (9%)	Low	15	15
12	Benfield Valley, south of Hangleton Lane	10.65	Ecology; Heritage; Open Space; Landscape; Flooding	Yes	Yes	0.75 (7%)	Low	15	15
14	Three Cornered Copse, bounded by Dyke Road Ave, King VI Ave	6.86	Ecology; Heritage; Open Space; Landscape	No for Open Space	No	0 (0%)	N/A	0	0
15	A27/A23 Interchange (including land east of Patcham Court Farm)	1.16	Access; Flooding	No access	No	0 (0%)	N/A	0	0
16	Land at and adjoining Horsdean Recreation Ground,	5.79	Heritage; Open Space; Landscape; Flooding	Yes	Yes	1.25 (22%)	Low	30	30

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
	Patcham								
17	Land at Ladies Mile, Carden Avenue	17	Ecology; Heritage; Open Space; Landscape	Yes	Yes	1.5 (9%)	Low	35	35
17a	Mackie Avenue	1.49	Absolute Constraint: Schedule Monument	No	No	0 (0%)	N/A	0	0
18	Land south of Hollingbury Golf Course and east of Ditchling Road (including land north of reservoir, Roedale allotments and Hollingbury Park)	20.1	Ecology; Heritage; Open Space; Landscape; Flooding	Yes	Yes	0.75 (4%)	Low	20	20
19	Lower Roedale Allotments and Playing Fields, Lynchett Close	7.06	Ecology; Heritage; Open Space; Landscape; Flooding	No for Ecology, Open Space and Landscape	No	0 (0%)	N/A	0	0
20	Hertford School Grounds,	1.62	Ecology; Heritage; Open	No for Ecology,	No	0 (0%)	N/A	0	0

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
	Lynchett Close		Space; Landscape; Flooding	Open Space and Landscape					
21	Land to north East of Coldean Lane	3.36	Ecology; Heritage; Open Space; Landscape	Yes	Yes	1.75 (52%)	High	130	Limited to 2.1ha (140 dwellings) across the cluster of sites 21, 21a and 21c.
21a	Land North of Varley Halls, Coldean Lane	4.14	Ecology; Heritage; Open Space; Landscape; Flooding	Yes	Yes	0.75 (18%)	High	50	
21b	Varley Halls, Coldean Lane	2.58	Heritage; Open Space	No as already developed	No	0 (0%)	N/A	0	
21c	Land South of Varley Halls	1.51	Ecology; Heritage; Open Space; Landscape; Flooding	Yes	Yes	0.3 (20%)	N/A	7	
26	Brighton University Playing Fields	9.09	Ecology; Heritage; Open Space; Flooding	No for Open Space	No	0 (0%)	N/A	0	0
27	City and Jewish Cemeteries	9.4	Absolute Constraint:	No	No	0 (0%)	N/A	0	0

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
			Cemetery						
28	Brighton Cemeteries, Tenantry Down Allotments and adjoining land	39.2	Ecology; Heritage; Open Space; Landscape; Flooding	No for Landscape	No	0 (0%)	N/A	0	0
29	Jewish Cemetery and land adjoining	2.92	Ecology; Open Space; Landscape; Flooding	No for Ecology	No	0 (0%)	N/A	0	0
30	Land at and adjoining Brighton Race Course	46.01	Ecology; Heritage; Open Space; Landscape; Flooding	Yes	Yes	1.5 (3%)	High	150	150
31	Land east of Whitehawkhill Road	8.75	Ecology; Heritage; Open Space; Landscape; Flooding	Yes	Yes	1 (11%)	Medium	50	50
31a	Whitehawk Hill Road/Manor Hill Road	1.36	Absolute Constraint: Scheduled Monument	No	No	0 (0%)	N/A	0	0
31b	Land west of Whitehawk Hill	10.68	Ecology; Heritage; Open	No for Ecology	No	0 (0%)	N/A	0	0

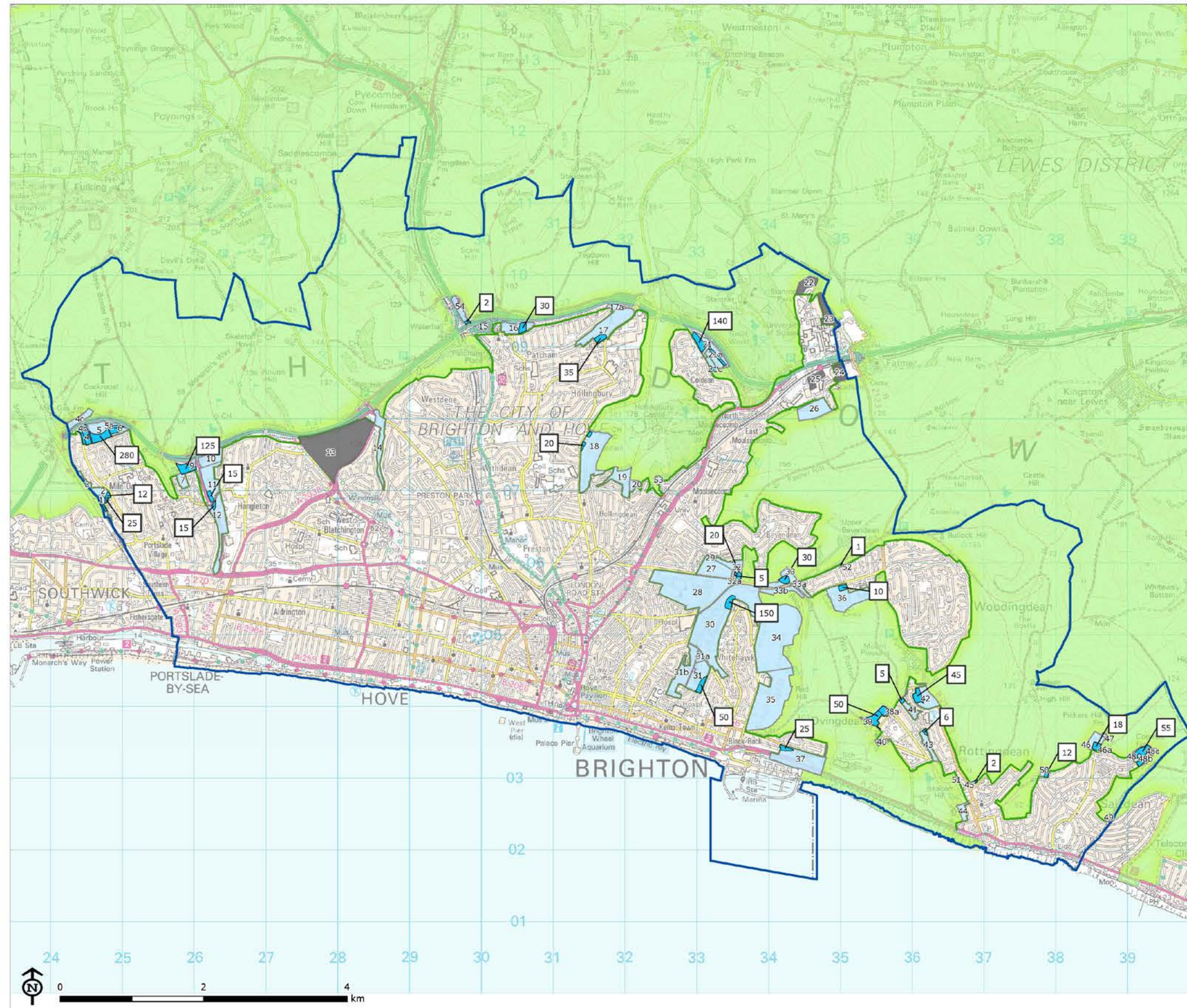
Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
	Road		Space; Landscape; Flooding	and Landscape					
32	Land at South Downs Riding School	1.71	Ecology; Landscape; Flooding	Yes	Yes	0.75 (44%)	Low	20	20
32a	Reservoir site	0.39	Reservoir; Landscape	Yes	Yes	0.2 (51%)	Low	5	5
33	Land north of Warren Road (Ingleside Stables)	5.23	Open Space; Landscape	Yes	Yes	1.25 (24%)	Low	30	30
33a	Land east of Warren Road	2.5	Open Space; Landscape	No for Landscape	No	0 (0%)	N/A	0	0
33b	Land south of Warren Road	2.75	Open Space; Landscape	No for Landscape	No	0 (0%)	N/A	0	0
34	Sheepcote Valley, Wilson Avenue.	43.14	Ecology; Open Space; Landscape; Flooding	No for Contamination	No	0 (0%)	N/A	0	0
35	East Brighton Park and Sports Ground	32.74	Ecology; Open Space; Landscape; Flooding	No for Contamination	No	0 (0%)	N/A	0	0

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
36	Land south of Warren Road, adjacent to Nuffield Hospital (included mixed open spaces and Lawns Memorial burial grounds)	14.88	Cemetery; Open Space; Landscape	Yes	Yes	0.5 (3%)	Low	10	10
37	Roedean Miniature Golf Course and land south of A259	17.38	Ecology; Heritage; Open Space; Landscape	Yes	Yes	1 (6%)	Low	25	25
38	Land at Ovingdean Hall Farm (land north of Bulstrode Farm)	1.34	Heritage	Yes	Yes	1 (75%)	Low	25	Limited to 2ha (50 dwellings) across sites 38, 38a and 39).
38a	Land at Ovingdean Hall Farm	0.22	Heritage	Yes	Yes	0.2 (91%)	Low	5	
39	Land at Bulstrode Farm / Ovingdean Farm (includes former chicken sheds)	2.83	Heritage; Flooding	Yes	Yes	1.5 (53%)	Low	35	

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
40	Land east of Greenways	1.15	Heritage; Open Space Landscape	No for Heritage and Open Space	No	0 (0%)	N/A	0	0
41	Land at Wanderdown Road Open Space	2.94	Heritage; Landscape	Yes	Yes	0.3 (10%)	Low	5	5
42	Land adjacent to Ovingdean and Falmer Road, Ovingdean	7.47	Ecology; Open Space	Yes	Yes	1.75 (23%)	Low	45	45
43	Land to rear of Longhill Road	3.45	Heritage; Landscape; Flooding	Yes	Yes	0.25 (7%)	Low	6	6
44	Allotments to west of The Green	2.35	Ecology; Heritage; Open Space; Landscape	No for Heritage, Open Space and Landscape	No	0 (0%)	N/A	0	0
45	Land to rear of Bazehill Road	0.15	Heritage	Yes	Yes	0.1 (67%)	Low	2	2
46	Land west of Saltdean Vale, Saltdean	3.26	Open Space; Flooding	No for Open Space	No	0 (0%)	N/A	0	0

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
46a	Land at Former Nursery site west of Saltdean Vale, Saltdean	0.97	Flooding	Yes	Yes	0.75 (77%)	Low	18	18
47	Land and buildings at Pickershill, Saltdean Vale	0.31	Flooding	No for Landscape	No	0 (0%)	N/A	0	0
48	Land at Coombe Farm Westfield Avenue	3.48	Flooding	Yes	Yes	2.0 (57%)	Low	50	Limited to 2.1ha (55 dwellings) across sites 48, 48a, 48b and 48c.
48a	Land north of Westfield Rise	0.6	None	N/A	Yes	0.3 (50%)	Medium	12	
48b	Land at Westfield Avenue North	0.58	None	N/A	Yes	0.2 (34%)	Low	2	
48c	Land at Saltdean Boarding Kennels	0.88	None	N/A	Yes	0.3 (34%)	Low	7	
49	Covered Reservoir – Longridge Avenue	0.57	Absolute Constraint: Covered Reservoir	No	No	0 (0%)	N/A	0	0
50	Land west of Falmer Avenue	1.3	None	N/A	Yes	0.5 (38%)	Low	12	12

Site Reference No.	Site Description	Total Site Area Assessed (ha)	Key Constraints	Mitigation Potential	Housing Potential	Potentially Developable Area of Site, See Site Plans (ha & %)	Density	Indicative Number of Dwellings	Indicative Totals following Site Cluster Moderation (ha/dwelling number)
51	Rottingdean Recreation Ground	0.14	Heritage; Open Space; Flooding	No for Open Space	No	0 (0%)	N/A	0	0
52	Rosebery Avenue, Woodingdean	0.11	Open Space	Yes	Yes	0.05 (45%)	N/A	1	1
53	Queensdown School	1.03	Ecology; Open Space	No for Ecology	No	0 (0%)	N/A	0	0
54	Land at Braypool Lane	3.18	Open Space	Yes	Yes	0.2 (6%)	Low	2	2
Totals		412.21	Totals			34.90 (8.5%)	N/A	1,356 Dwellings	30.9ha (7.5%) 1,183 Dwellings



Brighton and Hove Urban Fringe Assessment

Urban Fringe Site Assessment (2014)

- Number of units
- UA boundary
- Urban fringe with potential
- Urban fringe sites
- Previous urban fringe sites
- Built-up area boundary
- National park boundary

Map Scale @ A3: 1:52,000



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CB:AA EB:ather_a LUC/LON 6018-01_003_Urban_Fringe_Sites_Overview_Map 26/06/2014

Source: Brighton & Hove City Council, Ordnance Survey

Spatial distribution of urban fringe areas with potential to accommodate residential development