

# Sustainability Appraisal

Policy Options Paper  
Brighton & Hove City Plan

Non Technical Summary  
October 2011



Brighton & Hove  
City Council

## **Introduction**

This report is a summary of the Sustainability Appraisal Report that incorporates Strategic Environmental Assessment of the Policy Options Papers for the Brighton & Hove City Plan covering Student Housing, Housing Delivery, Park & Ride Transport, and Sustainable Economic Development.

This Non Technical Summary provides a summary of the stages undertaken so far, a brief overview of key sustainability issues facing the city, and a summary of the findings of the Sustainability Appraisal assessment. Detailed findings, along with a full list of plans, policies and programmes that have influenced development of the policy options papers and the Sustainability Appraisal Objectives can be found in the full Sustainability Appraisal Report.

The Sustainability Appraisal will be available for consultation, in accordance with Regulation 25, to enable statutory consultees and members of the public the opportunity to submit representations on the document and its findings.

## **What are Sustainability Appraisal and Strategic Environmental Assessment?**

The Planning and Compulsory Purchase Act (2004) requires that a Sustainability Appraisal (SA) is undertaken for all Development Plan Documents. The Strategic Environmental Assessment Directive (2001/42/EC) requires that a Strategic Environmental Assessment (SEA) is undertaken for all plans. Whilst SEA only assesses the impact of plans on the environment, SA assesses the sustainability of a plan, therefore encompassing environmental issues, as well as social and economic issues.

The combined SEA/SA process aims to ensure that likely significant sustainability effects arising are identified, assessed, mitigated and monitored. Findings from the SEA/SA have been incorporated and integrated into the development of the Policy Options Papers and in identifying a preferred option.

## **Scoping Report**

The council prepared a Scoping Report in 2005 that set out the baseline of the city with regards to environmental, economic and social issues of relevance. The report also identified the sustainability framework that has been used to assess the options and policies found in previous versions of the Core Strategy and set out the sustainability objectives that may have had a bearing on the document.

The Sustainability Appraisal Report contains updated information, including baseline information that was previously contained in the Scoping Report. Therefore it is considered unnecessary to produce a separate revised Scoping Report.

## Sustainability Issues in Brighton & Hove

This section provides a brief synopsis of the sustainability issues facing the city. Full information and references can be found in Section 4 of the Sustainability Appraisal Report.

### Environmental Issues

**Ecological Footprint** – Ecological Footprint uses units of area to assess an individual's environmental impact. In Brighton & Hove, the Ecological Footprint is 5.72 global hectares per person, higher than the regional and national averages.<sup>1</sup> The Ecological Footprint for Brighton & Hove is ranked as 377<sup>th</sup> out of 388 local authorities in England.<sup>2</sup> The Sustainable Community Strategy 2010 aims to achieve a reduction to 2.5ha per person by 2020.

**Climate Change** - Climate Change has been identified as one of the key challenges facing the UK. Climate changes in the UK are likely to include: changes in annual/seasonal average temperatures, rising sea levels, and increased frequency of extreme conditions which may lead to more flooding, subsidence and droughts. These will have different effects on different regions and are likely to have an adverse impact on the following: water resources, water quality, biodiversity, health, building and infrastructure, soils and the economy.<sup>3</sup>

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

DTI Energy trends for domestic gas and electricity consumption indicate that energy use in the home is responsible for 45% of Brighton & Hove's CO<sub>2</sub> emissions, with 35% of our carbon emissions coming from industry and commerce and 19% from transport.<sup>4</sup> Figures from DEFRA show that Brighton & Hove emitted a total of 1,351 kilo-tonnes of carbon dioxide in 2007, equivalent to about 5.3 tonnes per capita, a slight reduction from 5.5 tonnes per capita. The Sustainable Community Strategy sets a target for reduction of direct carbon emissions of 12% by 2012/13.

**Flood Risk** - As a coastal city, tidal flooding is an issue and is a potential constraint to the location of new development. It is estimated that sea level will continue to rise, increasing the risk of tidal flooding and erosion.<sup>5</sup>

There are no surface water courses in the city, therefore there is no risk of flooding from rivers. However, the south-western part of the administrative area around Shoreham Harbour lies within the flood plain of the River Adur.

Surface water flooding is also a particular risk because of the highly urbanised nature of the city and in particular "muddy" flooding in suburbs of the city when surface water runs off the Downs. Groundwater flooding is also a potential risk due to the high permeability of the underlying chalk South Downs, and linked to this is the potential for sewer flooding if infrastructure becomes inundated with groundwater.

Ground water flooding, surface water flooding, flooding from sewers and flooding from run-off from agricultural land following periods of high rain fall have all occurred in the city within the last 10 years. <sup>6</sup>

**Air Quality** - Road vehicles are the greatest contributing factor to poor air quality in Brighton & Hove. The Local Authority has a duty to review air quality under the Environment Act 1995, with the objective to determine whether national air quality standards have been exceeded. The results of a Detailed Assessment in 2004 found three areas which did not meet the annual Air Quality Objective for Nitrogen Dioxide (NO<sub>2</sub>) and as a result of this an Air Quality Management Area was declared that covered the Lewes Road, Grand Parade and Preston Circus/London Road areas.

A further Detailed Assessment carried out in 2007 found there to be 14 areas that did not meet the annual Air Quality Objective. As a result of this a revised Air Quality Management Area was declared in 2008. The AQMA 2008 covers a much larger area of the city; from the boundary with Adur District Council in the west, to Old Shoreham Road in the north, and to Arundel Road in the east. Again, the AQMA is in respect of the exceedance of the Nitrogen Dioxide (NO<sub>2</sub>) annual Air Quality Objective (AQO).

Although the AQMA has increased, monitoring results from long term surveys show that air quality has generally improved since 2003. The Updated Screening Assessment 2009 shows that 83% of sites monitored showed an improvement in air quality over the monitoring period 2007/08, although conversely this also shows that 17% of sites had worsened. <sup>7</sup> The Air Quality Progress Report 2010 concludes that for the 2009 period monitoring demonstrates overall lower Nitrogen Dioxide levels and lower concentrations of ozone with several of the AQMA locations now complying with the Air Quality Objective. However exceedance of the annual mean objective for NO<sub>2</sub> continues to be recorded at a number of locations within the AQMA, and with two locations outside the existing AQMA also showing exceedances for the first time. <sup>8</sup>

Prolonged exposure to NO<sub>2</sub> and particulate matter can irritate lungs and lower resistance to respiratory infections, particularly in the elderly, children and those with respiratory and cardiac problems.

**Transportation** - A good local transport system is needed to meet the needs of all residents and a balance between competing modes of transport must be sought. However, as road traffic is responsible for producing 19% of the city's carbon emissions and is also the main source of nitrogen oxides and particulate matters, sustainable transport and reducing the need to travel is imperative. In addition to contributing to climate change, poor air quality, and high levels of road-related noise, high amounts of road traffic also lead to congestion, which impacts on more sustainable forms of transport.

Nationally the number of cars on our roads is growing. Car ownership in Brighton & Hove averages at 0.87 cars per household, which is lower than the regional average of 1.3 and the national average of 1.1. <sup>9</sup>

Bus patronage has increased year on year from 30.2 million journeys in 2000/01 to 46.3 million in 2009/10 representing a 5% annual increase. <sup>10</sup> There are eight stations that serve the rail network located within Brighton & Hove. The combined annual footfall at all stations is 19,250,000. <sup>11</sup>

Walking is a popular choice in the city and is therefore a high priority, however there are several areas within the city that are not pedestrian friendly and lack permeability. Cycle use for travel to work in the city is 2.7%, which is similar to the national average (2.8%) and slightly below the regional average (3.1%).<sup>12</sup> The city includes a number of cycle routes including National Cycle Routes 2 and 20, and Regional Cycle Routes 82 and 90, as well as a number of local routes, however the city does not have a full cycle network. Transport is predicted to grow in the future, with the transport assessment undertaken in 2009 to test the impacts of the withdrawn Core Strategy indicating that without intervention, traffic is predicted to increase by 16.1% by 2026.<sup>13</sup> This makes it clear that a range of sustainable transport interventions will be necessary in order to accommodate the predicted growth of the city in a sustainable way.

**Water** - Southern Water data indicates that winter rain is vital to refill reservoirs and increase river flows and groundwater recharging. This has led the Environment Agency to classify the region as 'highly water stressed'. Progressive reduction of water use leading up to water neutrality in developments is one of the key challenges for the region in general and Brighton & Hove in particular.

The requirements of the EU Water Framework Directive means that all bodies of water (including surface water, coastal waters and groundwater) will need to achieve "good" status by 2015 and the quality of all water resources needs to be protected. A significant proportion of the city overlies the Brighton Chalk Aquifer. This is an important groundwater resource supplying water for public consumption and supplies the needs of Brighton & Hove and the neighbouring towns on the south coast. Groundwater quality in the Brighton Chalk aquifer is at risk of deterioration from nitrates and pesticides, relating to rural as well as urban inputs and in 2009 the status of the aquifer was classified as "poor".<sup>14</sup>

The quality of our seawater is of equal importance in terms of environmental quality and its value as a recreational asset. In 2010, seawater quality in Brighton was measured as "good", in Hove was measured as "good", and Kemp Town was measured as "good".<sup>15</sup>

**Waste** - Currently the majority of Municipal Solid Waste (MSW) produced by Brighton & Hove is disposed of at landfill with 44% disposed in this way 2009/10.<sup>16</sup> This amount has generally been decreasing year on year since 2001/02. Badly managed landfill can lead to air and water pollution or soil contamination and the decreasing landfill available creates a challenge for the future disposal of waste. There are also issues concerned with the transportation of waste to landfill sites, placing a burden on our road transport system, as well as contributing towards climate change and poor air quality.

In 2009/10 Brighton & Hove achieved a recycling rate of 23%<sup>17</sup> This figure has increased since 2001/02 when the total MSW recycled was only 8.56%.<sup>18</sup> In addition to increasing our recycling rates, the amount of waste produced also needs to be reduced. The total amount of household waste produced per capita in Brighton & Hove was 421kg in 2008/09. This includes materials recycled. This figure has decreased from 468.9kg in 2002/03 and is below the national average of 509kg (2006/07).<sup>19</sup>

In East Sussex and Brighton & Hove, construction and demolition wastes amount to over half the waste produced.<sup>20</sup> Any future development in the city must ensure that the amount of waste arising from any construction activity is reduced as far as possible through submission of site waste management plans.

**Biodiversity** - The distribution and types of species found in an area is a good indicator of the state of the wider environment. Even in urban areas, where natural habitats are often highly modified and fragmented, the presence of a range of beneficial species can be a good indicator of environmental quality.

The UK Biodiversity Action Plan (1994) established clear objectives for the maintenance, connection and extension of key habitats and species found throughout the UK. Local Biodiversity Action Plans (BAP) include actions to address the needs of the UK priority habitats and species in the local area, together with a range of other plans for habitats and species that are of local importance or interest. Brighton & Hove City Council is a member of the Sussex Biodiversity Partnership which is responsible for producing and overseeing the implementation of the Sussex BAP. In addition, Brighton & Hove is currently producing a local BAP which is was subject to initial consultation in 2011. A Green Network for Brighton & Hove will provide the spatial component of BAP habitat targets. A network has been progressed as a partnership project between Sussex Wildlife Trust and the Council. The aim is to define and create a continuous green network of routes through the city. The network will include the locations for the creation of new habitats (to meet BAP habitat creation targets) and help to mitigate the effects of Climate Change by reducing species isolation and facilitating the movement of species across the urban environment.

Brighton & Hove has a wealth of designated wildlife sites. Castle Hill is of European and UK importance, having been designated a Special Area of Conservation (SAC) under the EC 'Habitats' Directive and a National Nature Reserve and Site of Special Scientific Interest (SSSI). The city's other nationally important wildlife site is Brighton to Newhaven Cliffs SSSI. There are eight designated and proposed Local Nature Reserves in the city, these being Bevendean Down, Beacon Hill, Benfield Hill, Ladies Mile, Stanmer Park, Whitehawk Hill, Wild Park and Withdean Woods. The city has also designated 62 Sites for Nature Conservation Importance (SNCIs).

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

The South Downs is important for the quality of its landscape, as a recreational asset and an ecological resource. The elevated nature of the Downs provides extensive views over areas beyond the defined National Park boundary. Care therefore needs to be taken to ensure that development outside the designated boundary does not adversely affect the character of the National Park.

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

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

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

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

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

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

**Cultural Heritage** - The city has an extremely attractive historic urban environment. There are around 3,400 listed buildings, 15 scheduled ancient monuments, six registered parks or gardens of special historic interest and 34 conservation areas.<sup>21</sup> However a recent survey identified 6 of these Conservation Areas as being at risk.<sup>22</sup> The historic built environment of Brighton & Hove, particularly its rich Regency and Victorian legacy, is recognised of being of regional importance in the South East Plan; this historic environment is acknowledged as a tremendous asset, part of the regional and local character and sense of place, acting as a 'draw' for those investing in the area. Historic buildings are also an important cultural asset, contributing to positive visitor experience and tourism revenue, which is important to the local economy. They further provide an archaeological and educational resource for the future.

**Contaminated Land** - Brighton & Hove City Council has a statutory duty to produce a strategy to deal with 'contaminated land' in its area and to ensure that any contaminated land which is identified, is then remediated. The city council already holds information on some areas of land that has contaminants due to submissions under the development control process and has also undertaken a study of historical uses to ascertain whether areas of land have potential for contamination due to a previous or existing use. There are a number of sites with potential for significant contamination in Brighton & Hove.<sup>23</sup>

## Social Issues

**Demographics** - Brighton & Hove has a resident population of 258,00. <sup>24</sup>

- 64% of the population are aged between 20-64 which is higher than the national average.
- 21.5% of the population are aged under 19 which is lower than the national average.
- 14% of the population are over 65 which is lower than the national average.
- 6.8% of the population are unemployed.
- 13% of its population are students.

(All statistics sourced from State of the City Report 2011)

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

- Brighton & Hove has the highest overcrowding rate outside London <sup>25</sup>
- Despite the recent downturn, the city's housing remains largely unaffordable to the majority of its residents <sup>26</sup>
- The average cost of a one bedroom flat is five times the city's average household income <sup>27</sup>
- The annual affordable housing need is six times greater than actual build delivery levels <sup>28</sup>

Housing affordability is a major issue for the city, particularly for families and newly forming households. A lack of decent affordable housing contributes to social exclusion, impacts on labour supply and thus economic prosperity, generates long distance commuting and threatens public services. Given the evidence of the scale of housing need, planning must ensure that the affordable housing secured as part of new residential development across the city matches the local housing/accommodation needs and requirements of particular groups and communities.

There are approximately 37,000 students at the local Universities. The recruitment of full time students is expected to increase over the coming years and as a result there is expected to be a significant shortfall of bed spaces in purpose built student accommodation. The private sector has responded to this shortfall and there has been a significant conversion of family housing to student occupied Houses in Multiple Occupation in many neighbourhoods. <sup>29</sup>

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

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

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

Local health issues include health inequalities, mental health and suicide, alcohol and substance misuse, sexual health, and cancer. <sup>30</sup>

**Deprivation** - Based on the Index of Multiple Deprivation 2010, Brighton & Hove is ranked as the 66<sup>th</sup> most deprived authority in England.<sup>31</sup> This has increased from 79<sup>th</sup> in 2007 although cannot be directly comparable due to changes in measuring deprivation. 11% of the Super Output Areas (SOA) in the city fall within the 10% most deprived SOAs in England when looking at overall deprivation with 11 SOAs falling in the 5% most deprived. The Reducing Inequalities Review (2007) highlights that significant inequalities continue to exist between different areas and communities in the city. It also found that the majority of people facing deprivation do not live within the city's deprived areas although those facing multiple deprivation do tend to live within the most deprived areas.<sup>32</sup>

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

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

**Noise** - Noise can be a significant issue in built up urban areas, which can act as a disturbance but can also act as a threat to human health.<sup>33</sup> Noise guidance provided by the World Health Organisation states "general daytime outdoor noise levels of less than 55 decibels are desirable to prevent any significant community annoyance. The main generator of background noise in Brighton & Hove is road traffic, with the noise-mapping exercise undertaken by DEFRA indicating that there are many junctions and roads where noise levels exceed 75db, and this can have impacts on health.<sup>34</sup> In Brighton & Hove, a noise action plan produced in 2010 identified 2,250 dwellings within important areas that needed further investigation because of the effects of road traffic noise.

## Economic Issues

**Economy, employment and skills** – The UK recently suffered its longest and deepest recession since the 1930's resulting in a 6% loss in output between the end of 2008 and 2009<sup>35</sup>. Although the UK economy grew in the four quarters to September 2010 the impacts of the financial crisis are likely to remain for some time. It is estimated that city may lose 3,400 public and private sector jobs as a result of the Coalition Government's deficit reduction programme. This, in addition to the projected additional 2,700 working age people means that around 6,000 new jobs will need to be created by 2014 simply to maintain the current employment rate<sup>36</sup>

The percentage of people who were economically active in 2010 was 71.1% which is higher than the national average but lower than the regional average<sup>37</sup>. The employment rate has decreased by 2.2% over the period 2004-2009. This is despite 6,300 more people being in work now than in 2004 and is due to the increase in the working age population.<sup>38</sup> The working age population is projected to grow by 12,000 over the next ten years, which means that more than 8,000 people may need to find work for the employment rate to remain the same.

The city is exporting more workers than it attracts and high levels of travel to and from the city increase pressure on the transport infrastructure. Long-term economic sustainability is only likely to be achieved by developing high value added businesses locally that will retain higher skilled workers.

Brighton & Hove has one of the most highly qualified adult populations in the country, with 43% of residents holding a Level 4+ (degree or equivalent) qualification.<sup>39</sup> However, 8% of the working age population have no qualifications, educational attainment in schools is below average and there is a concern regarding the number of young people who are Not in Education, Employment or Training (NEET) which has increased in recent years.

**Tourism** - The tourism sector is an important source of employment in the city, with estimates suggesting around 15-20% of jobs are tourism related.<sup>40</sup> The economic contribution of tourism to the local economy was measured at £408 million in 2006, generated by around eight million visitors per annum, 6.5 million of these being day visitors. To ensure that Brighton & Hove continues to be a destination tourists wish to visit, there needs to be ongoing investment in infrastructure and the physical environment, including sustainable transport, there is a need to encourage and implement sustainable tourism principles, there is a need to improve the quality of offer and increase standards.<sup>41</sup>

Other sectors in the city which employ a significant amount of employees include the Financial & Business Services (approx 45,000 employees), Retail & Wholesale (approx 20,000 employees), Education & Health (approx 34,000 employees), and the Creative Industries (approx 24,000 employees).<sup>42</sup> The third sector, including voluntary and community organisations was estimated at £96.5 million in 2008<sup>43</sup>

## **The Sustainability Appraisal Objectives**

A number of Sustainability Appraisal objectives were established at the scoping stage and have been revised at various points in response to consultation. The Sustainability Appraisal objectives are used to identify the positive and negative impacts that the options for the policies may have on the environment, the economy and the social characteristics of the city.

The Sustainability Appraisal objectives:

1. To prevent harm to and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.
2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning.
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and archaeological sites and their settings effectively.
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.
5. To meet the essential need for decent housing, particularly affordable housing.
6. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development.
7. Minimise the risk of pollution to water resources in all development.
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
9. To promote the sustainable development of land affected by contamination.
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment.
12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors.
13. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap between those with the poorest health and the rest of the city.

14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.
16. To engage local communities into the planning process.
17. To make the best use of previously developed land.
18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings.
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
20. To encourage new developments to meet the high level Code for Sustainable Homes/BREEAM 'Excellent' standard.
21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and food stores.
22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

### **Appropriate Assessment / Habitats Regulations Assessment**

Article 6 of the Habitats Directive requires an Appropriate Assessment to be undertaken to assess the impacts of a plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Four sites are situated within the 20km zone of the administrative boundary of Brighton & Hove, of which only Castle Hill (SCA / SSSI) falls under the administration of Brighton & Hove City Council.

The Appropriate Assessment concluded:

'All the possible impacts of the Brighton & Hove Core Strategy on European sites have been discounted at the screening stage of this Appropriate Assessment and it is therefore concluded that no change to the Core Strategy is required.'

The Appropriate Assessment was distributed for consultation in March 2008. Natural England responded to the consultation and concurred with the findings of the Assessment, that the Core Strategy was unlikely to have a significant effect on any of the Natura 2000 sites. However, Natural England highlighted the fact that the Core Strategy was a developing document and that there should be a commitment to review the Habitats Regulations Assessment at Submission stage. This was undertaken in 2010 and all the possible impacts of the Brighton & Hove Core Strategy on European sites were discounted at the screening stage and it was concluded that no change to the Core Strategy was required at that stage. The Housing Delivery Options Paper includes an option to develop urban fringe. The Appropriate Assessment 2010 was revised to consider development on the urban fringe and it is considered that the Appropriate Assessment does not need to be reviewed further.

## Appraisal of options papers

All options papers have undergone an appraisal against the 22 sustainability appraisal objectives to determine the possible impacts and to help determine the preferred option. The full appraisals can be found in the main Sustainability Appraisal Report.

The following tables use the following key:

+	The policy has a positive effect on the SA objective
0	The policy has no effect on the SA objective
-	The policy has a negative effect on the SA objective
?	The effects on this objective are uncertain
-/+	The effects on this objective are mixed

In addition to the key outlined above multiples of positive “+” and negative “-“ scores were used to help indicate the performance of the option for each issue relative to the others. The number of multiples changes according to the particular issue and is described in more detail in each summary.

## Student Housing Options

### Issue A) Over concentration of HMOs

- **Option A1:** Adopt an Article 4 Direction and produce a policy framework for managing HMO accommodation in Part 1 of the City Wide Plan
- **Option A2:** Do not adopt an Article 4 Direction or produce a policy framework for managing HMO accommodation in Part 1 of the City Wide Plan.

### Issue B) New Student Accommodation (new build and changes of use)

- **Option B1:** No policy framework to manage the creation of new student accommodation in Part 1 of the City Wide Plan
- **Option B2:** Criteria based policy with no preferred sites identified.
- **Option B3:** Pro-active policy with appropriate student sites identified as Strategic Allocations, recognising that the most appropriate locations for student accommodation are located close to university campuses and in central locations within DA3, DA4 and DA5. Preferred sites identified by the universities are:
  - i. Varley Halls, Coldean Lane, Brighton (DA3 Lewes Road Area)
  - ii. Preston Barracks, Lewes Road, Brighton (DA3 Lewes Road Area)
  - iii. Pelham Street, Brighton (DA4 New England Quarter and London Road Area)
  - iv. Circus Street, Brighton (DA4 New England Quarter and London Road Area)
  - v. Former Co-Op Department Store, London Road, Brighton (DA4 New England Quarter and London Road Area).

## Appraisal methodology

In addition to the basic scoring system as outlined above, as there are two issues with up to three options for consideration, a scoring system which uses up to three “+” symbols or three “-“ symbols has been used where needed to help indicate the performance of the options for each issue relative to others.

## Table of anticipated impacts

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
<b>A1</b>	0	-	++	0	- /++	-	0	-	0	0	0	-/+	+	0	?	+	0	-	0	-	-	-
<b>A2</b>	0	+	--	0	-- /+	+	0	-	0	0	0	-/+	-	0	?	-	0	--	0	--	+	--
<b>B1</b>	-?	-?	-	-?	--	- ?	-	-	?	-?	+	+	--	+	?	-	?	-	-	-	-?	-
<b>B2</b>	?	?	+	?	+	?	-	--	?	?	++	++	+	++	?	+	?	--	-	+	?	-?
<b>B3</b>	+	+	+	+	++	+	+	---	?	+	+++	+++	++	++	+	+	+	---	-	+	+	-?

## Summary of impacts

### Option A1

- The option is considered to have positive impacts on objectives relating to maintaining local distinctiveness, improving health, and engaging local communities. This option should result in less HMOs being developed in certain areas, therefore helping to retain the existing character of the local area and preventing further studentification and the problems associated with this, such as poorly maintained properties and potentially unviable local services.
- The option is considered to have mixed (negative and positive) impacts on objectives relating to housing and economic development. The positive aspects against these objectives are that the option should result in less housing being developed into HMOs in certain areas, thereby retaining family housing of which there is a shortage in Brighton & Hove and having a positive impact on housing stock. The option may also reduce competition in the housing market between buy-to-let and other householders having a positive economic impact. The negative aspects against these objectives are that the option may result in less HMOs being developed for the private rental market to be occupied by non-students, particularly impacting on individuals on lower income who rely on HMOs as a more affordable housing option. A reduction in HMOs may inflate rental prices which could impact on the local economy.
- The option is considered to have negative impacts on objectives relating to air quality, transport and accessibility, water and energy consumption and meeting high environmental standards, and consumption of waste. The option may lead to a displacement of the problem into neighbouring wards, potentially including those that are not located within good access to sustainable transport and increasing the need to travel by car.

### Option A2

- The option is considered to have positive impacts on objectives relating to air quality, transport and accessibility. This is based on the assumption that existing trends and patterns of location of student HMOs will continue with the business as usual option.
- The option is considered to have mixed (negative and positive) impacts on objectives relating to housing and economic development. The positive aspects against these objectives are that HMOs will continue to be developed, which play an important role in the private rental market. The negative aspects against these objectives are that the option may reduce availability of family housing and existing housing stock .

- The option is considered to have negative impacts on objectives relating to maintaining local distinctiveness, improving health, water and energy consumption and meeting high environmental standards, and consumption of waste. This option may result in more HMOs being developed in areas that are already suffering from studentification, leading to a reduction in quality in the character of an area and potentially impacting on the viability of some services, e.g. schools.

### **Option B1**

- The option is considered to have positive impacts on objectives relating to employment, economic development and community safety. Some development is still anticipated to come forward with this option which will provide employment opportunities and be good for the local economy.
- The option is considered to have negative impacts on objectives relating to maintaining local distinctiveness, provision of housing, pollution to water, consumption of water and energy, health, engaging local communities, ensuring adaptability to climate change, meeting high environmental standards and reducing waste. If development fails to come forward in the required amounts, there may be further reliance on HMOs to provide student housing which can result in deterioration of the character of local neighbourhoods and reduce housing stock availability for existing communities, further impacting on health.
- The option may have negative impacts on objectives relating to biodiversity, air quality, transport and accessibility, protecting the South Downs, and coastal flooding. Development may be located in areas which harm biodiversity, is located away from public transport, may effect the designation of the SDNP or increase the likelihood of coastal flooding, however as the specific locations of sites are unknown the impact is negative uncertain.

### **Option B2**

- This option is considered to have positive impacts on objectives relating to maintaining local distinctiveness, provision of housing, employment, economy, health, community safety and engaging local communities. Development that comes forward will help to reduce the need to rely on HMOs which will help to prevent further deterioration of the character of local neighbourhoods and help to avoid a reduction in housing stock for existing communities. Development will provide employment opportunities and be good for the local economy.
- The option is considered to have negative impacts on objectives relating to pollution to water, consumption of water and energy, health, ensuring adaptability to climate change. Development that does come forward, under worst case scenario will increase urbanised areas thus increasing the risk of surface water flooding, and will increase consumption of water and energy.
- The option also has potential to have a negative impact on objectives that are site specific including biodiversity, air quality, transport and accessibility, protecting the South Downs, and coastal flooding, as described under Option B1. However, as this option will incorporate a policy framework that could include various considerations, there is more potential for positive impact with this option, and therefore the impact is considered to be uncertain, rather than negative uncertain for these objectives.

### **Option B3**

- The option is considered to have positive impacts on most objectives including biodiversity, air quality, transport and accessibility, the South Downs, housing, water pollution, coastal flooding, employment and economy, health, community

safety, engaging local communities, and making the best of previously developed land. Most significantly, this option provides certainty for developers and should result in required levels of student accommodation, reducing the need to rely on HMOs having a positive impact on housing provision. The identification of sites will also reduce the risk that the city's other housing sites are used for student accommodation, further benefiting housing provision. Employment opportunities will be provided through construction, further benefiting the local economy. In addition, the identification of sites provides clarity over whether development will have negative impacts on site based objectives, e.g. biodiversity and coastal flooding.

- The option was found to have an overall positive impact on maintaining local distinctiveness, particularly as this should reduce the need to rely on HMOs, which can have adverse impacts on the character of neighbourhoods. However it is noted that the Varley Halls site has considerable constraints, such as proximity to SDNP and other designations which may impact on this objective.
- The option was also considered to have positive uncertain impacts on objectives relating to reducing deprivation, as some of the sites identified are located within Super Output Areas that face high levels of overall deprivation and may provide opportunities for reducing local deprivation, however this will depend on implementation of the policy.
- The option is considered to have negative impacts on objectives relating to consumption of water and energy and ensuring adaptability to climate change.

### **Overall Summary and comparison of options**

#### **Option A1 and A2:**

- Although both options may result in positive as well as negative impacts, the development of a policy framework, as described by Option A1 presents a greater opportunity for more positive impact than Option A2 and is the preferred option for this issue.

#### **Options B1, B2 and B3:**

- Option B1 is likely to result in more negative impacts overall than positive impacts, although these are fairly uncertain, and is the least preferable option compared to Options B2 and B3.
- Option B2 may also result in negative impacts, mainly due to the unknown location of sites that may be developed. However the fact that this option would result in a policy framework presents a greater opportunity than Option B1 for these impacts to be addressed, and is considered to be less negative, although still uncertain.
- Although Option B3 may result in some negative impacts, the potential for positive impacts is far greater. This option provides clear direction for developers, and provides more certainty over potential impacts that developments may have as sites are identified. Option B3 is the preferred option for this issue.

### **Preferred options**

Combination of option A1 and B3

### **Recommendations for Student Housing preferred options**

#### **Option A1:**

Results for this option could be improved by including the following in the policy framework:

- Criteria for assessing applications according to proximity to public transport.

- Criteria that specifies that change of use from C3 to C4 should incorporate features to reduce water and energy consumption, although as this policy would not be applied citywide this may be considered an unreasonable requirement.
- In addition, as an Article 4 Direction may reduce numbers of HMOs coming forward to be occupied by non-students and thereby reduce housing availability to those who rely on HMOs to provide housing, the SA only supports this option provided that the Article 4 Direction is only applied to areas where the amount of student occupied HMOs is over a certain amount, as outlined in the option.

### **Option B3:**

Results for this option could be improved by including the following in a policy framework:

- Criteria that specifies features to protect and enhance biodiversity are included in any development, particularly on sites where biodiversity is currently lacking.
- For sites that are located within the existing AQMA, there should be criteria to ensure the air quality is not reduced further, e.g. through no provision of parking for students.
- Criteria that specifies development must enhance the existing characteristics of the local area.
- Criteria that specifies installation of features to minimise water and energy consumption should be maximised as well as features to enable adaptation to a changing climate.
- Criteria that specifies development should meet high standards and requirements set out in BREEAM Multi-Residential scheme.
- Criteria that specifies facilities to help students reduce/reuse/recycle waste are maximised.

With regards to the Varley Halls site, the site is adjacent to the SDNP, within an Archaeological Notification Area, surrounded by a Local Nature Reserve, and surrounded by a Historic Park and Garden. Impact Assessments must be carried out prior to development taking place to ensure the nature of these various designations are not compromised.

With regards to the Circus Street, Co-op, Pelham Street, and Preston Barracks sites, which are located within Super Output Areas of significant deprivation, development should provide opportunities to reduce deprivation where possible, such as through local employment opportunities.

## **Housing Delivery Options**

**Issue:** Delivery of housing in Brighton & Hove.

### **Option 1: 9,800 new homes for period 2010-2030 (490 per annum).**

- All housing will be accommodated within existing built up area of the city.

### **Option 2: 11,200 new homes for period 2010-2030 (560 per annum).**

- Development of a greenfield site, Toads Hole Valley, on the northern edge of the City for a mixed use development with approximately 700 units of housing.
- Mixed use development on some employment sites required.
- Some development at Shoreham Harbour.

### **Option 3: 13,500 new homes for period 2010-2030 (675 per annum).**

- Development of a greenfield site, Toads Hole Valley required
- Mixed use development on some employment sites required.
- Loss of 11.5ha of the City’s employment sites to housing required (equivalent to 8-14 employment sites).
- Loss of up to 23ha of open space to housing required.
- Some development at Shoreham Harbour.

**Option 4: 15,800 new homes for period 2010-2030 (790 per annum).**

- Development of a greenfield site Toads Hole Valley required.
- Mixed use development on some employment sites required.
- Loss of 23ha of the City’s employment sites to housing required (equivalent to 16-28 employment sites).
- Loss of up to 46ha of open space to housing required.
- Some development at Shoreham Harbour.

**Appraisal methodology**

In addition to the basic scoring system as outlined above, as there are four options for consideration, a scoring system which uses up to four “+” symbols or four “-” symbols has been used to help indicate the performance of the option relative to others.

**Table of anticipated impacts**

	1	2	3	4	5	6	7	8	9	10	11
<b>Option 1</b>	-?	-	-	0	+	-	-	-	?	-	+
<b>Option 2</b>	--?	--	--/+?	--	++	--	--	--	?	--	++
<b>Option 3</b>	---?	---	---	--	+++	---	---	---	+?	--	--
<b>Option 4</b>	----?	----	----	--	++++	----	----	----	+?	--	---

	12	13	14	15	16	17	18	19	20	21	22
<b>Option 1</b>	+	++	+	++?	+	+++	-	-	-	+	-
<b>Option 2</b>	++	++++	+	++?	++	++	--	--	-	-/+	--
<b>Option 3</b>	--	+	+	+?	+++	+	---	---	-	-	---
<b>Option 4</b>	---	+	+	+?	+++	+	---	----	-	--	----

**Summary of impacts**

**Option 1**

- This option is considered to have positive impacts on objectives relating to housing, employment, economic development, health, community safety, reducing deprivation, engaging communities, making the best of previously developed land and improving accessibility.
- This option is considered to have negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, transport, water pollution, water consumption, coastal flooding, energy consumption, adapting to climate change, meeting environmental standards and reducing waste.
- This option is considered to have uncertain impacts on the objective relating to promoting the development of contaminated land.

## **Option 2**

- This option is considered to have positive impacts on objectives relating to housing, employment and economy, health, community safety, reducing deprivation, engaging communities, and making the best of previously developed land.
- This option is considered to have negative impacts on objectives relating to biodiversity, air quality, the South Downs, transport, water pollution, water consumption, coastal flooding, energy consumption, adapting to climate change, meeting environmental standards and reducing waste.
- This option is considered to have mixed (positive and negative) impacts on objectives relating to maintaining local distinctiveness and improving access.
- This option is considered to have uncertain impacts on the objective relating to promoting the development on contaminated land
- The positive results for the housing, health, employment and economic development objectives are considered to be of significance, and the negative results for the biodiversity, South Downs, water pollution and climate change objectives are also considered to be of significance.

## **Option 3**

- This option is considered to have positive impacts on objectives relating to housing, health, community safety, reducing deprivation, engaging communities, and making the best of previously developed land. The impact on health is less positive than that associated with options 1 and 2, and this is considered to be of importance.
- This option is considered to have negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, the South Downs, transport, water pollution, water consumption, coastal flooding, employment, economic development, energy consumption, adapting to climate change, meeting environmental standards, improving access and reducing waste.
- This option is considered to have potential for positive but uncertain impacts on the objective relating to promoting the development of contaminated land.
- The positive result on the housing objective is considered to be of significance. The negative results on the biodiversity, maintaining local distinctiveness (open space), South Downs, water pollution, employment, economic development, air quality, transport and objectives are considered to be of significance.

## **Option 4**

- This option is considered to have positive impacts on objectives relating to housing, health, community safety, reducing deprivation, engaging communities, and making the best of previously developed land. The impact on health is less positive than that associated with options 1 and 2, and this is considered to be of importance.
- This option is considered to have negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, the South Downs, transport, water pollution, water consumption, coastal flooding, employment, economic development, energy consumption, adapting to climate change, meeting environmental standards, improving access and reducing waste.
- This option is considered to have potential for positive but uncertain impacts on the objective relating to promoting the development on contaminated land.
- The positive result on the housing objective is considered to be of significance. The negative results on the biodiversity, maintaining local distinctiveness (open space), South Downs, water pollution, employment, economic development, air quality, transport and objectives are considered to be of significance.

## **Overall Summary and comparison of options**

### **Option 1:**

- This option is likely to result in fewer significant negative impacts than other options, however it would also result in fewer significant positive impacts, particularly in relation to the housing objective, as will result in the lowest amount of housing delivered.
- The housing target is well below the amount as assessed as required to meet local future needs, and is also below the amount tested through the South East Plan process as capable of delivering considering the environmental constraints of the city.

As the delivery of housing is the main aim of this policy, this option is not recommended to be pursued.

### **Option 2:**

- There are three objectives where this option has potential for most significant positive impact compared to other options, including the objectives relating to employment and the economy, as this option will provide employment opportunities at construction stage and does not include loss of entire employment sites.
- The positive impact relating to health is also of significance. This option will result in provision of housing and employment opportunities, both of which are wider determinants of health. This option will also prevent the loss of employment opportunities that will be associated with total loss of employment sites and prevent the loss of other open spaces in the city, which will also have positive impacts on health, although this is not a direct impact of this option.
- The type of housing delivered on the Greenfield site is more likely to be family type housing, which there is a shortage locally and may also increase provision of useable open space in that location as the land is currently private.
- Although this option will not result in the highest amount of housing, the target is similar to the South East Plan target which was tested as being achievable considering the environmental constraints of the city.
- There are four objectives where this option has the potential for significant negative impact, although the impacts are not considered to be as significant as the impacts associated with Options 3 and 4. These are the biodiversity, the South Downs, water pollution and adapting to climate change objectives. The risk of negative impacts on these objectives is mainly due to the development of a Greenfield site.
- It is considered that the impacts on biodiversity could be mitigated through features to enhance the local environment, and that sustainable drainage systems could be used to prevent the risk of water pollution and the city's ability to adapt to climate change. However the landscape impact on the South Downs National Park may be permanent and difficult to mitigate against.
- This option is also likely to result in negative impacts on air quality and transport, mainly due to the amount of housing developed but also due to the lack of existing sustainable transport provision for the Greenfield site. The impacts on air quality and transport are not considered to be as significant as those associated with Options 3 and 4 which may result in out-commuting due to loss of employment sites.

Although this option has potential for negative impacts, some of which may be significant, it has potential for more significant positive impacts than other options and is the recommended option to be pursued for Housing Delivery.

This option would require further investigation to clarify potential impacts and substantial mitigation, particularly in relation to the Toads Hole Valley Site, would be required.

### **Option 3:**

- The positive results against the housing objective are considered to be significant, and this option will deliver more housing than Option 1 and 2, although less than Option 4. However, achieving this housing target would come at significant cost to the city, with increased risk of adverse impacts when compared to Options 1 and 2, mainly due to the loss of employment sites and sites of open space.
- The negative impacts anticipated on the employment and economic development objectives through the loss of employment sites are considered to be significant, long-term and permanent. The loss of employment sites is also likely to increase the likelihood of other negative impacts, for example by increasing numbers of journeys made and worsening air quality, as may result in increased out-commuting.
- The loss of employment sites and sites of open space both impact on the objectives relating to health and deprivation, with the results for health being less positive than they are with Options 1 and 2, despite this option delivering more housing.
- The loss of employment sites and loss of sites of open space go against the recommendations in the Employment Land Study 2009 and the Open Space Sports and Recreation Study 2008/09.
- The loss of open space associated with Option 3 is also likely to result in greater significant negative impacts than Option 2 on biodiversity, maintaining local distinctiveness, pollution of water resources and adaptation to climate change.
- The negative impact on the South Downs is considered to be equivalent to that of Option 2.

Although Option 3 would result in a higher amount of housing than Options 2 and 3, the significance of the negative impacts associated with this option, particularly on the objectives relating to employment, economic development, health and the city's ability to adapt to climate change are considered to outweigh any potential housing gains. This option is not recommended to be pursued for Housing Delivery.

### **Option 4:**

- This option resulted in the most significant positive impact on the housing objective as this option had the highest housing target.
- However, there are ten objectives where this option has the strongest negative impact compared to other options, of which the negative impacts on objectives relating to biodiversity, air quality, maintaining local distinctiveness, transport, water pollution, employment, economic development, and adaptation to climate change are considered to be of high significance for reasons outlined under Option 3.
- In addition, and as outlined under Option 3 above, the impact of this option on the health objective performs the poorest of all options, as the positive aspects of housing delivery have been outweighed by the negative impacts associated with loss of employment sites and sites of open space.

Although this option would result in the highest amount of housing, this would come at great economic, environmental and social cost. This option is therefore not recommended to be pursued for Housing Delivery.

## **Preferred option**

### Option 2

#### **Recommendations for Housing Delivery preferred option**

- All housing should incorporate features to benefit biodiversity whether situated on brownfield sites, Greenfield sites or existing employment sites.
- Housing, particularly when situated within the built up area, should incorporate features to reduce car ownership, e.g. a number of car-free units, provision of car-club membership, increased number of car-club vehicles.
- All housing, but particularly high density tall buildings, should be in regard to the local characteristics of the surrounding neighbourhood and should consider the setting of the historic, built and natural environment.
- All housing should incorporate provision of open space to accommodate the needs of the future population.
- Any mixed use development on employment sites should aim to maintain the former amount of employment floorspace by intensifying development on the site to accommodate housing.
- All housing should incorporate SUDS to minimise the risk of surface water flooding and pollution to groundwater.
- All housing should meet required standards of SPD08 Sustainable Building Design, particularly in terms of water and energy consumption.
- Construction job opportunities should be provided for local people, particularly where sites are situated within areas of deprivation.
- All housing should incorporate features to help adaptation to climate change.
- All housing should ensure construction and demolition waste is minimised and that appropriate waste management features are maximised in development.

#### **Additional Recommendations for housing delivered on urban fringe site**

- An ecological survey to assess the biodiversity value of the site required to enable significance of impact of development on biodiversity to be understood/anticipated. This should be undertaken prior to any proposals for development are submitted.
- Biodiversity value of the site should be increased through mitigation e.g. through development of substantial natural features that attract local wildlife, and should be reflective of and integrate the natural surrounding habitats.
- Impact assessment on value of SNCI should take place to ensure designation is not compromised. Development should secure enhancements to SNCI to facilitate improvements.
- Impact assessment on the setting of the SDNP should be undertaken to ensure that any development does not compromise the designation, including views of and from the SDNP.
- Improvements to the Greenway should be secured and options to link the site to the adjacent SDNP should be investigated.
- Screening of the development should take place to reduce noise and visual impact on surrounding communities.
- Open space should be provided, particularly of the typologies which are deficient in this area.
- Investment in public transport is required to link the site to existing local services.
- Housing should be of low density and should include a high proportion of traditional family type housing.
- Development of the site would need to incorporate substantial SUDS to mimic the role the sites plays in terms of absorbing surface water.

- Opportunities for district heating throughout the site should be maximised.
- Development should be complemented with essential services for the local community, including health services and local shops, including access to food.
- The site should be assessed for any potential mineral deposits and any useful top-soils and sub-soils stored and re-used on site where possible and other excavation wastes re-used.

## Park and Ride Transport Options

**Issue:** Should the provision of Park and Ride sites remain a priority for Brighton & Hove City Council

### Option 1: No park and ride

Remove the park and ride proposal from policy CP8 and develop other measures to mitigate the impact of increased car movements in the city. Measures include improving cycle and walking facilities; working with rail and bus companies to increase patronage, improve affordability and better integrate services; increase take up of travel management measures by schools and employers; consider fiscal measures such as car parking changes.

### Option 2: Retain park and ride with revised policy

Retain proposal for park and ride in the form of a revised criteria-based policy incorporated into CP8 by which future proposals would be assessed. (See options paper for sequential approach and criteria).

### Option 3: Retain park and ride with no change to policy CP8

No change – retain part 4 of policy CP8 which states “providing three to five Park & Ride sites adjacent to key strategic corridors that will be identified in the Development Policies and Site Allocations DPD/Apr 2 of the City Wide Plan”. This includes sequential approach to finding sites in the supporting text.

### Assessment methodology

In addition to the basic scoring system as outlined above, as there are three options for consideration, a scoring system which uses up to three “+” symbols or three “-” symbols has been used where needed to help indicate the performance of the options for each issue relative to others.

### Assumptions

Option 2: the number of sites is unknown but will be less than Option 3.

Option 3: will result in 3-5 smaller sites.

Options 2 and 3: the location of sites for park and ride are unknown.

Although there are wider concerns over the viability of both options 2 and 3, for SA purposes it is assumed that these options can be delivered, otherwise they are not realistic options to assess.

### Table of anticipated impacts

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
1	0	+	0	0	0	+	0	0	0	0	-?	-?	+	+	0	+	0	0	0	0	+	0
2	-?	+	-?	-?	0	+	-?	0	+	0	+	+	+	+	0	+	?	0	-?	0	+	0
3	--?	+	--?	--?	0	+	--?	0	+	0	+	+	+	+	0	+	?	0	--?	0	+	0

## Summary of impacts

### Option 1

- The SA found that not having park and ride could be seen to avoid negative impacts on site based objectives including the biodiversity, maintaining local distinctiveness, protecting the South Downs, minimising pollution to water, promoting the development of contaminated land, and taking account of the changing climate objectives. However the avoidance of negative impact does not equate to a direct positive impact, and is more likely to result in no impact on these objectives. The alternative measures proposed in the option are unlikely to have any impact on these objectives.
- The option is considered to have positive impacts on objectives relating to air quality and reducing car journeys. The proposed measures of mitigation are likely to lead to a reduction in car journeys, and therefore have associated impacts on air quality, however without having a formal assessment there is some uncertainty of the impact of these measures.
- The option is considered to have a positive impact on objectives relating to health and health & safety, as the some of the proposed measures are health promoting, e.g. walking and cycling, and any overall reduction in traffic resulting from the measures would have wider health benefits.
- The option is considered to have negative but uncertain impacts on the employment and economic development objectives. This is due to the potential for park and ride to increase visitor numbers to the city having a wider economic benefit. Removing park and ride could therefore have negative implications on these objectives, although would be an indirect impact of this option and would need to be subject to an additional assessment to be fully understood.

### Options 2 and 3

- The results for options 2 and 3 were found to be the same, however the negative results for option 3 were considered to be more significant than those associated with option 2.
- The options are considered to have positive impacts on the objectives relating to air quality and transport as park and ride was one of the measures found by the Transport Assessment to contribute towards reducing traffic into the city, also resulting in positive impacts on objectives relating to health, health & safety and improving access. However the SA noted that the reduction in congestion index found by the Transport Assessment by implementing park and ride over other measures of mitigation was minimal.
- The options are considered to have positive but uncertain impacts on employment and economic development objectives. This is due to the potential for park and ride to increase visitor numbers to the city, having a wider economic benefit, however without a formal assessment this impact is not fully understood.
- The options were also found to have potential for positive impact on the objective relating to promoting development of contaminated land, however is uncertain as this would depend on the location of the site.
- The options are considered to have potential for negative impacts on the objectives relating to biodiversity, maintaining local distinctiveness, protecting the South Downs, minimising pollution to water, and adapting to climate change, however these are also uncertain as would depend on the location and current use of the site.

## **Overall summary and comparison of options**

- Overall, Option 1 has more potential for positive impact than negative impact, although some of the impacts are still fairly uncertain. The option sets out some of the alternative measures to mitigate the impact of increased car movements and these should have positive impacts on improving air quality, reducing car journeys and therefore bring about improvements to health. However, without having a formal assessment of the impact these measures will have it is uncertain of what the actual reduction, measured by congestion index, will be, and it is recommended an assessment take place to ascertain this.
- By not having park and ride, Option 1 has the potential to avoid a range of adverse impacts, particularly site-based adverse impacts such as on biodiversity, the SDNP, the built environment and pollution to water resources. However, not having park and ride could also have a negative impact on employment and the economy.
- Option 3 appears to have more potential for more significant negative impacts against some objectives when compared with Option 2. This is due to the strength of the policy wording associated with Option 2, where the sequential approach and site selection criteria is contained within the policy text and therefore carries more weight.
- Both options 2 and 3 are considered to have the potential to reduce car journeys made in the city and therefore improve air quality and health, based on the findings of the Transport Assessment 2009, although the SA considers that this will take place only if an equivalent number of city centre car parking spaces are removed. The SA also notes that the reduction in congestion index associated with the delivery of park and ride is minimal and questions whether the anticipated reduction in traffic achieved is a worthwhile investment when considering the costs of implementing park and ride.
- Overall, both options 2 and 3 have more potential for negative impact than Option 1, particularly against the site based objectives. In addition, there are concerns over the viability and deliverability of park and ride, both in terms of the cost to implement and sites to be developed.

Overall, the SA finds Option 1 to be the preferred option, as this option has more potential for positive or no impact than negative impact and is also the more viable option. The SA recognises that Option 1 may have an indirect negative impact on the economic development and employment objectives and that this can only be fully understood if a study to compare the environmental costs of having park and ride to the economic costs of not having park and ride is undertaken. The SA also recognises that the potential gains in terms of reduction in car journeys are uncertain, and the impact of these measures should be assessed.

## **Preferred option**

Option 1

### **Recommendations for preferred option:**

- The option could be improved further against the air quality objective by promoting alternative fuelled vehicles, particularly alternatives to diesel fuelled buses in high density areas.
- An assessment to ascertain the impacts of the proposed measures of mitigation on congestion index would be useful.

### **Other recommendations:**

To fully understand the implications of park and ride, it would be useful to have: information on potential sites to fully assess any site constraints, and a cost analysis of various measures so that the cost of implementing park and ride and the associated reduction in car journeys could be compared with the cost of implementing other mitigation measures and the associated reduction in car journeys.

## **Sustainable Economic Development Options**

### **Issue 1: Recognition and support of the city's primary office area**

- **Option 1(i):** to identify central Brighton as the city's primary office location and protect existing office accommodation and encourage their refurbishment and upgrade. Policy to include flexibility around change of use and redundancy.
- **Option 1 (ii):** to not identify the areas role in the central Brighton special area policy as the city's primary office location and to leave the protection of office accommodation to be dealt with in a generic employment protection policy.

### **Issue 2: Accommodating the need for additional office floorspace**

- **Option 2(i):** Accommodate a proportion of the 20,000sqm floorspace through redevelopment and more intensive use of Vantage Point, Longley Industrial Estate and Richardsons Scrapyards. Achieve the remaining floorspace through outstanding/existing permissions at Block J and K Brighton Station Site, Cheapside, land adjacent to Britannia House Blackman Street Site, GB Liners site and City College site Pelham Street.
- **Option 2 (ii):** Through the identification of New England Road and London Road Area as the broad location suitable for accommodating 20,000sqm of additional office floorspace, with sites to be allocated in City Wide Plan Part 2.
- **Option 2 (iii):** Strategic Allocation of two sites within the New England Quarter and London Road Development Area.

### **Issue 3: Maintaining an adequate supply of appropriate, affordable office accommodation**

- **Option 3(i):** General policy of protection of secondary office accommodation unless redundancy proven with no preference given to alternative uses.
- **Option 3 (ii):** General policy of protection of secondary office accommodation unless redundancy proven with preference for reuse given to alternative employment uses and/or affordable housing.
- **Option 3 (iii):** No general protection of secondary office accommodation.

### **Issue 4: More specific mention of strategic employment sites and their roles within Development Areas**

- **Option 4(i):** No specific allocation of primary employment sites within Development Area proposals and leave site allocations to City Wide Plan Part 2.
- **Option 4(ii):** Specific allocation of primary employment sites and their roles within Development Areas (with sites identified in options paper)

### **Issue 5: Appropriate hierarchy and protection of strategic industrial estates and premises**

- **Option 5 (i):** Clarify the hierarchy of protection through: (a) identifying and protecting industrial estates and business parks where business, manufacturing and warehouse development will be promoted and loss will be resisted; and (b)

identify sites where allow employment-led mixed use development will be permitted in order to secure good quality modern and flexible employment floorspace.

- **Option 5 (ii):** To not alter the overall proposed approach set out in the previous version of the plan to protecting industrial sites and premises but leave employment site allocations to City Wide Plan Part 2. (Previous version approach: Employment sites and premises will be safeguarded – no hierarchy and no sites identified).
- **Option 5 (iii):** Consider whether further flexibility around employment generating permitted uses should be allowed on the estates/premises outlined in Option 5(ia).

**Issue 6: Maintaining an adequate supply of appropriate affordable business, manufacturing and warehouse accommodation.**

- **Option 6 (i):** For all other “secondary” business, manufacturing and warehouse (B1 b, B1 c, B2 and B8) sites/premises accommodation will be protected unless redundancy proven.
- **Option 6 (ii):** General policy of protection of secondary business, manufacturing and warehouse sites and premises unless redundancy proven but preference for re-use to be given to alternative employment generating uses and affordable housing.
- **Option 6 (iii):** No general protection of secondary business, manufacturing and warehouse sites and premises.

**Assessment methodology**

In addition to the basic scoring system as outlined in the methodology, as there are a maximum of three options for consideration for each issue, a scoring system which uses up to three “+” symbols or three “-” symbols has been used where needed to help indicate the performance of the options for each issue relative to others. Less symbols are used for issues where there are less options.

**Tables of anticipated impacts**

**Issue 1**

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
1i	0	+	-?	0	-	+	-	+	?	-?	++	++	+	0	0	0	+	+	0	+	+	+
1ii	0	-	-?	-?	+	-	-	?	?	-?	+	+	+	0	+	0	?	?	0	?	-	-

**Summary and comparison of options for Issue 1**

Option 1(i)

- This option is considered to have positive impacts on objectives relating to air quality, transport, employment, economic development, health, making the best of previously developed land, improving access and reducing waste. Development directed to central Brighton will benefit from good existing sustainable transport links. Protection of existing office accommodation will be beneficially to employment and the economy and will minimise loss to housing through change of use.
- The impacts on objectives relating to water consumption, energy consumption and meeting BREEAM standards are considered to be positive uncertain, as refurbishment could include environmental improvements but will depend on implementation.
- This option is considered to have negative impacts on objectives relating to housing delivery, as employment uses are protected, and water pollution, and is considered

to have negative uncertain impacts on objectives relating to maintaining local distinctiveness and coastal flooding as will depend on sites developed.

- The impact on development on contaminated land is also considered to be uncertain.
- The positive impacts on the objectives relating to employment and economic development are considered to be more significant than Option 1(ii).

#### Option 1(ii)

- This option is considered to have positive impacts on objectives relating to housing delivery, employment, economic development, and health. This option allows flexibility around change of use, which may result in housing gains. Although this option allows change of use more readily, this option should still result in positive impacts on employment and economic development as presumably office development would be located elsewhere in the city, which may result in more affordable workspace outside the central location.
- The impact on the objective relating to deprivation is considered to be positive uncertain and will depend on the location of sites and whether situated within areas of deprivation.
- This option is considered to have negative impacts on objectives relating to air quality, transport, water pollution, improving access and waste. Development located outside the central Brighton area may be less accessible, and may not benefit from the existing sustainable transport links, leading to an increase in journeys made by other means and having associated impacts on air quality.
- The option is considered to have negative but uncertain impacts on objectives relating to maintaining local distinctiveness, the South Downs and coastal flooding and will depend on sites developed.
- The impact on objectives relating to water consumption, energy consumption and meeting BREEAM standards are all uncertain as it is not clear whether this option will encourage refurbishment, and if it did, whether this would include environmentally-based improvements.
- The impacts on objectives relating to contaminated land and previously developed land are also uncertain as would depend on the site developed.

Overall, Option 1(i) has more potential for positive impacts and more certainty than Option 1(ii) and is therefore the preferred option. In order to improve the performance of the option it could specify whether refurbishment and upgrade should incorporate features to improve the environmental performance of the building, however this may be covered by other policies.

## Issue 2

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
2i	+?	-	0	0	0	-	-	-	+	+	+++	+++	++	0	+?	0	+	-	0	-	++	-
2ii	?	-	-?	0	0	-	-	-	?	+	++	++	+	0	+?	0	+?	-	0	-	+	-
2iii	?	--	--?	0	0	-	-	-	?	+	+	+	+	0	+?	0	+?	-	0	-	+	-

## Summary and comparison of options for Issue 2

### Option 2(i)

- This option is considered to have positive impacts on objectives relating to development of contaminated land, reducing risk of coastal flooding, employment, economic development, health, making best use of previously developed land and improving access. The option should help to meet the need for additional office

floorspace creating employment opportunities and benefiting the economy. Development delivered over a range of smaller sites may be more viable in the current economic climate and the naming of sites creates more certainty for developers.

- The impacts on the objectives relating to biodiversity and reducing deprivation may be positive however are uncertain as will depend on implementation.
- This option is considered to have negative impacts on objectives relating to air quality, transport, water consumption, pollution to water, energy consumption, meeting high environmental standards and reducing waste. Any additional development is likely to result in an increase in journeys made, having associated impacts as well as increasing consumption of resources and increasing the risk of surface water flooding.
- The positive impacts of the option on employment and economic development and health are considered to be more significant than other options.

#### Option 2(ii)

- This option is considered to have positive impacts on objectives relating to reducing risk of coastal flooding, employment, economic development, health and improving access. Office accommodation should still come forward with this option, although the identification of the area as a broad location does not provide as much certainty for developers as Option 2(i) and may delay development from coming forward.
- The impacts on the objectives relating to reducing deprivation and making the best use of PDL may be positive however are uncertain as will depend on implementation and the sites developed.
- This option is considered to have negative impacts on objectives relating to air quality, transport, water consumption, pollution to water, energy consumption, meeting high environmental standards and reducing waste. As described under Option 1 any additional development is likely to result in an increase in journeys made, having associated impacts as well as increasing consumption of resources and increasing the risk of surface water flooding.
- The impact on the objective relating to maintaining local distinctiveness could be negative, however is also uncertain due to the unknown location of sites that would be developed.
- The impact on the objective relating to development of contaminated land are uncertain due to the unknown location of sites to be developed.

#### Option 2(iii)

- This option is considered to have positive impacts on objectives relating to reducing risk of coastal flooding, employment, economic development, health and improving access. As with options 2(i) and (ii), office accommodation should still come forward, however limiting development to two larger sites may delay development in the current economic climate and may prove problematic in terms of site location and therefore the positive impact on employment and economic development is considered to be the lowest with this option.
- The impacts on the objectives relating to reducing deprivation and making the best use of PDL may be positive however are uncertain as will depend on implementation and the sites developed.
- This option is considered to have negative impacts on objectives relating to air quality, transport, water consumption, pollution to water, energy consumption, meeting high environmental standards and reducing waste, as for reasons described under Options 2(i) and 2(ii) above.

- The impact on the objective relating to maintaining local distinctiveness could be negative, however is also uncertain due to the unknown location of sites that would be developed.
- The impact on the objective relating to development of contaminated land are uncertain due to the unknown location of sites to be developed.
- The potential negative impacts on air quality and maintaining local distinctiveness are considered to be more significant than options 2(i) and 2(ii).

Overall, Option 2(i) has more certainty than options 2(ii) and 2(iii) as the specific sites are named and any relative constraints of the sites can be assessed and addressed. Many results for Options (ii) and (iii) are unknown, particularly site specific objectives due to the lack of information on specific sites. The naming of sites is considered to provide clarity and more certainty for developers and businesses and may result in development brought forward more readily than other options, having stronger positive impacts on objectives relating to employment, economic development and health than other options. Development of smaller sites associated with option 2(i) seems more viable in the current economic climate than two large developments and may meet the required local needs by offering a range of premises over a range of sites.

Overall Option 2(i) has more certainty and more potential for positive impacts and is therefore the preferred option.

### Issue 3

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
3i	0	0	0	0	+	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	+	0
3ii	0	0	0	0	+++	0	0	0	0	0	++	++	++	0	0	0	0	0	0	0	0	++	0
3iii	0	-?	0	0	++	-?	0	0	0	0	-	-	-	0	-?	0	0	0	0	0	0	-	0

### Summary of and comparison of options for Issue 3

#### Option 3(i)

- This option is considered to have positive impacts on objectives relating to housing, employment, economic development, health and increasing access. This option offers a high level of protection of secondary office accommodation, thus helping to retain secondary employment uses therefore supporting the local economy, and may also result in change of use to other uses having benefits for housing, but only if redundancy proven.
- There were no negative or uncertain impacts anticipated.

#### Option 3(ii)

- This option is considered to have positive impacts on objectives relating to housing, employment, economic development, health and increasing access. This option offers a high level of protection of secondary office accommodation, thus helping to retain secondary employment uses and supporting the local economy, but may also result in positive gains for affordable housing and other employment uses if redundancy can be proven.
- There were no negative or uncertain impacts anticipated.
- The positive impacts associated with all objectives are considered to be more significant than option 3(i).

Option 3(iii)

- This option is considered to have positive impacts on objectives relating to housing as there is no protection of secondary office accommodation which may result in more changes of use to housing.
- This option is considered to have negative impacts on objectives relating to employment, economic development, health and accessibility. The lack of protection of secondary office accommodation could result in change of use to other uses and substantial loss of office floorspace. This could impact on access to employment and impact on health.
- The impacts on objectives relating to air quality, transport and reducing deprivation were also considered to be negative, but were uncertain.

Overall, Option 3(ii) has more potential for stronger positive impacts than other options and is therefore the preferred option. The policy wording on proving redundancy would need to be very specific in order to ensure that redundancy is not encouraged, particularly as land values for housing uses are higher than employment uses.

**Issue 4**

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
4i	?	?	?	?	?	?	?	0	?	?	-	-	?	0	?	0	?	0	0	0	?	0
4ii	+	-/+	-/+?	0	-/+?	+	+	0	?	-	+	+	+	0	+?	+	+	0	0	0	+	0

**Summary and comparison of options for Issue 4**

Option 4(i)

- The impacts for this option are uncertain and could be negative due to the lack of information regarding sites associated with this option.

Option 4(ii)

- This option should have positive impacts on objectives on employment, economic development and health, as the naming of sites is considered to provide certainty for developers and the business community.
- In addition, the sites identified were found to have an overall positive impact on biodiversity, reducing car journeys, preventing pollution to water, engaging local communities, making the best of previously developed land and increasing access.
- The majority of sites are located within areas of deprivation, therefore having potential to reduce deprivation through provision of employment, however this is uncertain.
- The sites identified had potential for mixed impacts on objectives relating to air quality, maintaining local distinctiveness and provision of housing. The Inner Harbour site and South Portslade site are both situated within Flood Zone 3b and may be at risk of coastal flooding.
- The impact on whether any of the sites offer potential for development of contaminated sites is uncertain, and will require further investigation into the sites.

Overall Option 4(ii) has more potential for positive impact and provides certainty for developers and business community due to the naming of sites. This is the preferred option.

## Issue 5

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
5i	+	-	0	-?	++	-	+	-	?	0	++	++	++	0	+	+	+	-	-	-	-	
5ii	+	-?	0	-?	+	-?	+	-	?	?	+	+	+	0	+	0	+	-	-	-	-?	-
5iii	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	0	+	0	0	0	0	0

### Summary and comparison of options for Issue 5

#### Option 5(i)

- This option is considered to have positive impacts on the objectives relating to biodiversity, housing, minimising water pollution, employment, economic development and health. Development on existing sites may bring about opportunities to enhance biodiversity and provide opportunities to implement SUDS. Sites will be identified where mixed use permitted, thereby having positive gains for housing, and the naming of sites provides clarity and certainty for developers and business community.
- In addition, the impacts on objectives relating to deprivation and previously developed land were also considered to be positive but uncertain.
- The option is considered to have negative impacts on the objectives relating to air quality, transport, water consumption, energy consumption, adapting to climate change, meeting high environmental standards, increasing access and reducing waste. Further development at named sites may increase transport movements and may increase consumption of resources.
- The impacts on objectives relating to protecting the South Downs were also considered to be negative but uncertain, as some of the industrial estates named are located near to or adjacent to the SDNP.
- The impacts on employment, economic development and health were considered to be more significant than with option 5(ii).

#### Option 5(ii)

Although, this option does not name sites, as the option relates to existing sites, some assumptions were made in terms of impact on biodiversity, local designated sites and other objectives, although impacts were still uncertain. This differs from Option 4(i) in which the allocated sites were unknown.

- The option is considered to have positive impacts on objectives relating to housing, water pollution, employment, economic development and health. This option protects industrial sites and premises, however as sites are not named there is less clarity and certainty for developers and the business community.
- The option is considered to have positive but uncertain impacts on objectives relating to biodiversity, deprivation and previously developed land.
- The option is considered to have negative impacts on objectives relating to water consumption, energy consumption, adapting to climate change, meeting high environmental standards, increasing access and reducing waste, as with option 5(i).
- The impacts on objectives relating to protecting the South Downs, air quality, transport and access were also considered to be negative but uncertain.

#### Option 5(iii)

Due to the topic this option covered, the option had no direct link with the majority of the objectives. The objectives which it did have a link to the impact is considered to be positive, or positive uncertain.

- This option is considered to have positive impacts on the objectives relating to employment and economic development as further flexibility around the type of employment uses allowed could encourage new businesses on these sites.

Overall the preferred approach is a combination of Option 5(i) and (iii) as this combination offers the most potential for positive impacts and has more certainty.

## Issue 6

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22
<b>6i</b>	0	0	0	0	+	0	0	0	0	0	+	+	+	0	0	0	+	0	0	0	+	0
<b>6ii</b>	0	0	0	0	+++	0	0	0	0	0	++	++	++	0	0	0	+	0	0	0	++	0
<b>6iii</b>	0	-?	0	0	++	-?	0	0	0	0	-	-	-	0	-?	0	+	0	0	0	-	0

## Summary and comparison of options for Issue 6

### Option 6(i)

- This option is considered to have positive impacts on objectives relating to housing, employment, economic development, health and increasing access, with possible positive impacts on making best use of previously developed land. This option offers a high level of protection of manufacturing and warehouse sites/premises, thus helping to retain employment uses and supporting the local economy, and may also result in change of use to various other uses, including housing but only if redundancy proven.
- There were no negative impacts anticipated.

### Option 6(ii)

- This option is considered to have positive impacts on objectives relating to housing, employment, economic development, health and increasing access with possible positive impacts on making best use of previously developed land. This option offers a high level of protection of manufacturing and warehouse sites/premises, thus helping to retain employment uses, but may also result in positive gains for affordable housing and other employment uses if redundancy can be proven.
- There were no negative impacts anticipated.
- The positive impacts associated with all objectives are considered to be more significant than option 6(i).

### Option 6(iii)

- This option is considered to have positive impacts on objectives relating to housing as may result in change of use from employment use to housing use.
- This option is considered to have negative impacts on objectives relating to employment, economic development, health and accessibility. This option offers no protection for secondary business premises and may result in substantial loss of employment floorspace, which could be significant in the long term.
- The impacts on objectives relating to air quality, transport and reducing deprivation were also considered to be negative, but were uncertain.

Option 6 (ii) is the preferred option as resulted in no negative impacts and more significant positive impacts than option 6 (i). The policy wording on proving redundancy would need to be very specific in order to ensure that redundancy is not encouraged.

## **Preferred options for Sustainable Economic Development**

- Option 1i
- Option 2i
- Option 3ii
- Option 4ii
- Combination of options 5i and 5iii
- Option 6ii

## **Recommendations for all preferred Sustainable Economic Development options:**

Employment-based development/refurbishment associated with all options should:

- Secure enhancements to biodiversity and wildlife sites;
- Develop staff travel plans to encourage sustainable travel;
- Be of an appropriate scale and type to ensure local designations are not compromised;
- Bring about wider improvements to townscape and public realm;
- Incorporate SUDS;
- Incorporate water efficient technologies;
- Ensure appropriate remediation of contaminated land;
- Maximise opportunities to link with locally deprived communities;
- Maximise opportunities to engage with local communities;
- Maximise potential of land, in terms of appropriate densities, parking etc.
- Incorporate renewable energy technology where possible and maximise energy efficiency in new build and refurbishment;
- Achieve high environmental standards;
- Ensure construction waste is minimised and operational waste minimised through waste saving features.

## **Additional recommendations for individual preferred options:**

Option 1i:

In order to improve the performance of the option it could specify whether refurbishment and upgrade should incorporate features to improve the environmental performance of the building, however this may be covered by other policies.

Option 3ii:

The policy wording on proving redundancy would need to be very specific in order to ensure that redundancy is not encouraged.

Option 6ii:

The policy wording on proving redundancy would need to be very specific in order to ensure that redundancy is not encouraged.

## **Monitoring**

Once the City Plan is adopted, its significance will be monitored. The measures envisaged for monitoring the impact of the City Plan will be finalised at the next stage. It is envisaged that a range of indicators, including sustainability indicators will be used for monitoring purposes.

## **Next Steps**

This Sustainability Appraisal Non Technical Summary is now out for consultation alongside the full Sustainability Appraisal Report and Policy Options Papers in accordance with Regulation 25, to enable statutory consultees and members of the public to submit representations.

The documents are out for consultation starting Monday 17<sup>th</sup> October 2011. Any comments should be sent by the 2<sup>nd</sup> December to:

LDF Team  
Room 410-414  
Hove Town Hall  
Norton Road  
Hove  
BN3 3BQ

Or by email to:

[ldf@brighton-hove.gov.uk](mailto:ldf@brighton-hove.gov.uk)

Or by fax to:

(01273) 292351

## References

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