

Brighton & Hove Submission City Plan Part One

Further Proposed Modifications

June 2015

Schedule of Further Proposed Modifications to the City Plan Part One



Brighton & Hove
City Council

Brighton & Hove City Plan Part One - Schedule of Further Proposed Modifications June 2015

This schedule of Further Proposed Modifications contains:

- Further Proposed Modifications arising from the Inspector's Further Matters and Issues (April 2015) which are highlighted in grey. New text is shown underlined and old text is ~~struckthrough~~.
- Further proposed modifications arising from consultation responses to the proposed modifications¹ (November – December 2014) or general updates/corrections. For ease of reading, these modifications are highlighted in yellow, with new text underlined and old text ~~struck through~~.
- Previous proposed modifications that remain unchanged are shown un-highlighted and are not the subject of this focused consultation.

A screening of SA impacts has been prepared.

Ref	Policy, page no.	Proposed Modification	Notes
PM003	Introduction and Overview, page 5 Paragraph 1.4	<ul style="list-style-type: none"> • The South Downs National Park was formally designated in April April <u>31 March</u> 2010 and the National Park Authority brought into effect in April 2011. This is now the planning authority for the administrative area of Brighton & Hove that falls within the National Park. This area will no longer be covered by the Brighton & Hove City Plan Part 1 policies but will be covered by the Core Strategy <u>Local Plan</u> for the National Park. 	Editorial – correction
PM010	The Strategy, pages 24,28,29	<p>Amendment to paragraph 2.20, second sentence:</p> <p>However, in light of the significant scale of the city's housing need, objectively assessed to fall within a range of 18,000 – 24,000 as 30,120 new homes to 2030, <u>the requirementetc</u></p>	In response to Further Matter 1 – Objectively Assessed Need for Housing,

¹ Schedule of Proposed Modifications published October 2014 (BHCC-36 Schedule of Proposed Modifications)

		Amendment to footnote# <u>#Coastal West Sussex Housing Study Update 2014 Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited.</u>	
PM045	DA7 Toad's Hole Valley	<p>DA7 Toads Hole Valley</p> <p>High standards of sustainable development</p> <p>3.86 Environmental sustainability will be central to the design and layout of development at Toad's Hole Valley which will be expected to meet <u>the requirements set out in CP8 Sustainable Buildings Code for Sustainable Homes Level 6, BREEAM Outstanding and be zero carbon or carbon neutral.</u> When it can be demonstrated that sustainable building standards cannot be met on site, mitigation measures will be sought in accordance with <u>the national zero carbon policy unless exemptions apply and City Plan</u> policy CP8 Sustainable Buildings and CP7 Infrastructure and Developer Contributions through Allowable Solutions or an agreed local offset mechanism.</p>	In response to Further Matter 3 – consistency with national policy.
PM068	SA6 Sustainable Neighbourhoods, page 120	<p>A. 8. Deliver balanced communities through the requirement for new residential development to provide an appropriate amount of affordable housing, mix of dwelling sizes and tenure types and <u>to through the City Plan Part 2 ensure new housing meets lifetime homes standards optional technical standards for access and minimum dwelling space standards the nationally described space standards.</u> In areas where there is a concentration of social rented housing, a better choice of housing tenures will be sought (see CP1 Housing Delivery, <u>CP19 Housing Mix</u> and CP20 Affordable Housing).</p>	In response to Further Matter 3 – consistency with national policy.
PM069	SA6 Sustainable Neighbourhoods,	Add bullet point to the list of aims in paragraph 3.172:	In response to Further Matter 3 –

	page 121	<ul style="list-style-type: none"> • <u>ensure new residential development provides for an appropriate mix of dwelling types and tenures and meets minimum space standards- the new national technical standards and through the City Plan Part 2 seek to apply the nationally described space standards and optional technical requirements in respect to accessibility, adaptability and wheelchair standards.</u> 	consistency with national policy.
PM072	CP1 Housing Delivery, pages 127-132	<p>Amendment to paragraph 4.2</p> <p>A series of studies indicate that <u>To meet in full the city’s ‘objectively assessed housing need’ (housing demand and need) over the plan period to 2030 could mean needing to build 1506 between 900—1200 dwellings per annum or 18,000—24,000 30,120 dwellings to 2030.</u></p> <p>Amend footnote 127</p> <p><u>Assessment of Housing Development Needs Study: Sussex Coast HMA, May 2014. Objectively Assessed Need for Housing: Brighton & Hove, June 2015, GL Hearn Limited.</u></p> <p>Add additional text after the third sentence within paragraph 4.5</p> <p>The fact that the city’s housing delivery target does not match the objectively assessed full housing requirement means that there is a ‘duty to cooperate’ with the city’s neighbouring local authorities. Brighton & Hove’s strategic housing market and travel to work area extends westwards incorporating Adur District and parts of Worthing District; eastwards incorporating parts of Lewes and northwards to Mid Sussex, Horsham and Crawley. Many of these areas also face similar challenges in meeting housing requirements. <u>Within Brighton & Hove, the council acknowledges that there is a significant housing shortfall* against the objectively assessed housing requirement of 30,120 dwellings to 2030.</u> In accordance with government guidance, the council will <u>therefore continue to</u> engage constructively, actively and on an</p>	In response to Further Matter 1 – Objectively Assessed Need for Housing.

		<p>ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. <u>This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.</u></p> <p>Add new bullet point:</p> <p><u>* Equivalent to 16,920 units over the plan period to 2030.</u></p>	
PM075	CP3 Employment Land, pages 138-139	<p>3. Protection of the following primary industrial estates and business parks for business, manufacturing and warehouse (B1, B2 and B8) use:</p> <p>Centenary Industrial Estate English Close Industrial Area, Old Shoreham Road Home Farm Industrial Area Hove Technology Park, St Josephs Close, Old Shoreham Road Moulsecoomb & Fairways Industrial Estate Sussex House (including BT depot) Woodingdean Business Park Hyde Business Park, Bevendean Bell Tower Industrial Estate Hollingbury Industrial Estate Hollingdean Industrial Estate Victoria Road Industrial Estate Newtown Road Industrial Estate</p> <p>The council will support proposals for the upgrade and refurbishment of these estates and premises so that they meet modern standards required by business, are more resource efficient and improve the environment or</p>	In response to Further Matter 2 – Housing Target.

		<p>townscape of the site or premise.</p> <p>Sui generis uses, <u>including waste management facilities</u>, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1- B2 <u>B8 Use Classes</u>[#]; do not harm the continuation of existing uses within those Classes and comply with other City Plan policies <u>and for waste management facilities the Waste and Minerals Plan</u>.</p> <p>4. In order to secure good quality modern, flexible employment floorspace the council will allow employment-led (residential and employment) mixed use development on the following employment sites:</p> <ul style="list-style-type: none"> Franklin Road Industrial Estate School Road, Hove Melbourne Street Industrial Area Portland Road Trading Estate (including EDF and Martello House) Land North of Newtown Road <p>There should be no net loss in employment floorspace. <u>unless this can be justified. Paragraph 4.36 sets out the factors that will be taken into consideration.</u></p> <p>5. <u>Loss of Unallocated sites or premises in, or whose last use was,</u> employment use (Use Classes B1-B8) will not be released to other uses unless only be permitted where the site or premises it can be demonstrated to be both redundant and incapable of meeting the needs of modern <u>alternative employment uses (Use Classes B1-B8)</u>. Where release <u>loss</u> is permitted the <u>preference priority</u> for re-use will be for alternative employment generating uses or <u>affordable</u> housing (in accordance with CP20 Affordable Housing).</p> <p>Insert new footnote:</p>	
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		# Employment generation as compared with average employment densities as set out in Table 3 of the HCA/Offpat Employment Densities Guide, 2010 or subsequent updates.																	
PM082	CP6 Visitor Accommodation, Page 153	4.58 The city has a significant stock of hotel and guest accommodation; a total of 160 hotels and guest accommodation predominantly located in central Brighton and along the seafront. The council undertook a capacity and needs analysis of hotel bedspaces <u>rooms</u> in the city to understand the future capacity of the city to absorb new hotel accommodation (2007 Hotel Futures Study). Since the study was completed 3 new hotels have come into operation (Jury's Inn, MyHotel and Royal York hotel) adding 365 bedspaces <u>rooms</u> (although the latter is now in operation as a 151 bed youth hostel). Furthermore there is the potential for an additional 372 bedspaces <u>rooms</u> through recent outstanding planning commitments ¹⁷⁵ .	update																
PM117	CP7 Infrastructure and Developer Contributions, page 157	Update supporting text: 4.72 ...Upon adoption of CIL or after 6 April 2014 2015, pooled contributions can only be sought from up to 5 separate planning obligations for an item of infrastructure.	update																
PM085	CP8 Sustainable Buildings, page 160	<p>1. All development will be required to achieve the minimum standard as set out below or equivalent standards from a quality assured scheme;</p> <p>Replace table set out under CP8.1:</p> <table border="1"> <thead> <tr> <th rowspan="3">NEW BUILD</th> <th colspan="2">Development size</th> <th rowspan="2">Post 2016</th> <th rowspan="2">Post 2019</th> </tr> <tr> <th colspan="2">2013-2016</th> </tr> <tr> <th>Non-major</th> <th>Major and Greenfield</th> <th>All</th> <th>All</th> </tr> </thead> <tbody> <tr> <td>Residential Code for Sustainable Homes</td> <td colspan="2">Level 4 Level 5</td> <td colspan="2">Level 5 Level 6</td> </tr> </tbody> </table>	NEW BUILD	Development size		Post 2016	Post 2019	2013-2016		Non-major	Major and Greenfield	All	All	Residential Code for Sustainable Homes	Level 4 Level 5		Level 5 Level 6		In response to Further Matter 3 – consistency with national policy.
NEW BUILD	Development size			Post 2016	Post 2019														
	2013-2016																		
	Non-major	Major and Greenfield	All	All															
Residential Code for Sustainable Homes	Level 4 Level 5		Level 5 Level 6																

			Non-residential BREEAM	Very Good	Excellent	Outstanding	
			CONVERSIONS	Non-major (3-9 units) and Major			
			Residential	BREEAM Very good			
		With:					
		Residential	<u>Until the adoption of national Zero Carbon Homes standard</u>		<u>Post Adoption of Zero Carbon Homes standard²</u>		
		<u>Energy Performance</u>	<u>19% carbon reduction improvement against Part L 2013³</u>		<u>Zero Carbon</u>		
		<u>Water Performance</u>	<u>Water efficiency 'optional' standard⁴</u>				
			2013-2019		Post 2019		
		Non-residential	Development size				
			Non-major	Major and Greenfield		All	

		<table border="1"> <tr> <td>BREEAM</td> <td>Very Good</td> <td>Excellent</td> <td>Outstanding⁵</td> </tr> <tr> <td>CONVERSIONS</td> <td colspan="3">Non-major (3-9 units) and Major</td> </tr> <tr> <td>Residential</td> <td colspan="3">BREEAM Very good⁶</td> </tr> </table> <p>New footnotes to table: ¹ Expected to be late 2016 ² This standard is equivalent to Code for Sustainable Homes level 4 in energy use. See paragraph 4.84-4.86 for guidance on demonstrating this standard. ³ The 'optional' enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency' March 2015, page 15, G2(3). At 2015 this is defined as consumption 110 litres per person per day to be demonstrated. http://www.planningportal.gov.uk/uploads/br/BR_PDF_AD_G_2015.pdf ⁴ Unless superseded by national prescribed standards ⁵ Unless superseded by national prescribed standard</p> <p>Standards may be updated in other DPD documents and/or a review of this policy.</p>	BREEAM	Very Good	Excellent	Outstanding ⁵	CONVERSIONS	Non-major (3-9 units) and Major			Residential	BREEAM Very good ⁶			
BREEAM	Very Good	Excellent	Outstanding ⁵												
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Residential	BREEAM Very good ⁶														
PM118	CP8 Sustainable Buildings, Page 162	<p>When onsite sustainability standards cannot be met mitigation measures may be sought, including those in accordance with Policy CP7 Infrastructure and Developer Contributions and Allowable Solutions <u>subject to government exemptions</u> ¹⁸³ or a local offset mechanism using this approach.</p> <p>Footnote 183</p>	In response to Further Matter 3 – consistency with national policy.												

		183 These are part of the measures supporting the Government's 2016 <u>Zero Carbon Homes</u> Building Regulations target. Allowable Solutions present mitigation measures for carbon that will be emitted from development and cannot be addressed on site by fabric performance, energy efficiency or renewables. Allowable Solutions introduce an option for financial payment towards mitigating carbon emissions not addressed on site. <u>The government may exempt certain developments from Allowable Solutions.</u>	
PM087	CP8 Sustainable Buildings, page 162	4.77 Brighton & Hove is particularly vulnerable to the impacts of present and future climate change. Opportunities for growth and expansion are constrained by the South Downs to the north of the city and the sea to the south. The city also contains a high proportion of protected and/or old buildings ¹⁸⁴ . Within this context, the need to secure improvement in the environmental performance of the existing stock as well as more resource efficient and carbon neutral development whilst delivering homes and jobs through development is challenging. The combination of standards with provisions for viability assessments will help address this challenge. This will provide the flexibility needed to ensure the right balance between the economic, environmental and social objectives of the City Plan. The standards set out in this policy are commensurate with the scope of this challenge. Energy, water and waste have been identified as key resource issues of particular concern in relation to growth in the city ¹⁸⁵ .	In response to Further Matter 3 – consistency with national policy.
PM089	CP8 Sustainable Buildings, page 164	4.83 The Building Research Establishment Environmental Assessment Method (BREEAM) and the Code for Sustainable Homes (CSH) are <u>is a</u> widely recognised, accredited, independent methods for assessing environmental performance of non-residential and residential buildings, respectively. <u>These tools will be used to support policy decision making because they cover a wide range of sustainability issues within a simplified score that provides flexibility for developers in meeting standards set in this policy. Successors to these tools and/or</u> <u>Until superseded by national prescribed standards, the BREEAM standards for non-residential buildings will be required.</u> <u>e</u> Equivalent standards by nationally recognised certification bodies may also be accepted ¹⁹⁰ . Any changes to nationally described standards and or revised Building Regulations will be addressed through Part 2 of the City Plan or a review of	In response to Further Matter 3 – consistency with national policy.

this Policy:

4.84 An assessment of the energy demand and carbon dioxide emissions will be expected from all residential and proposed major developments, which should demonstrate the expected energy and carbon dioxide emission savings from energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:

- calculation of baseline energy demand and carbon dioxide emissions;
- compliance against Part L of the Building Regulations
- proposals for the reduction of energy demand and carbon dioxide emissions from heating, cooling and electrical power;
- proposals for meeting residual energy demands through sustainable energy measures; and
- calculation of the remaining energy demand and carbon dioxide emissions.

Add after 4.84 following paragraph:

In the case of residential development, evidence must be submitted demonstrating that all dwelling types meet the minimum energy efficiency standard. Until the national Zero Carbon Homes standard is implemented (expected late 2016) the local requirement is for a minimum 19% carbon reduction improvement against Part L compliance. Using methods referred to in 4.84-5, an energy assessment should cover the following:

- The energy assessment must first establish the regulated emissions assuming the development complies with Part L of the Building Regulations.
- For each representative dwelling type, the related 'Target Emission Rate' (TER) is multiplied by the cumulative floor area for that dwelling type to establish the related CO2 emissions.

		<p>• <u>The CO2 emissions for each dwelling type are then summed to give the total regulated emissions for the development. This should indicate carbon reduction of a minimum of 19% against a part I compliant dwelling for each dwelling type.</u></p> <p>...</p> <p>4.87 More is asked of larger, new build and greenfield types of development as these tend to benefit from economies of scale and easier, cheaper ways in which sustainable design and construction features can be designed in. A growing number of flagship schemes in the UK⁴⁹¹ and in Brighton & Hove⁴⁹² have demonstrated the viability of such developments. In order to provide clarity and flexibility for developers...</p> <p>Delete footnotes 191 and 192:</p> <p>⁴⁹¹See Homes and Communities Agency's Carbon Challenge website.</p> <p>⁴⁹²A number of high standard developments have already been achieved under the 2005 adopted Local Plan policy SU2.</p>	
PM119	CP9 Sustainable Transport, page175	<p>4.126</p> <p>In terms of new development, it will be a priority to review and prepare an up to date Supplementary Planning Document (SPD) setting out parking and servicing standards for new development. Car parking standards will be based on maximum standards, and cycle and disabled driver parking will be minimum standards <u>accord with the NPPF and the SPD will also include standards for cycle, disabled driver and motorcycle parking.</u> Consideration will also need to be given to the level of provision of motorcycle parking. Standards and requirements for meeting the needs for new technologies including electric vehicle charging points and <u>opportunities</u> for 'car free' housing proposals will <u>also</u> be addressed in the SPD.</p>	In response to Further Matter 3 – consistency with national policy.

PM120	CP12 Urban Design, page 185-186	<p>4.150</p> <p>With regard to <u>adaptability</u>, the government has introduced national technical standards related to accessibility, adaptability and wheelchair standards. Through the City Plan Part 2 the council will provide evidence and seek to introduce a policy to provide enhanced accessibility or adaptability#. this policy requires that new development should comply with Lifetime Homes²⁰⁶ standards. Further guidance is set out in the Council's Accessible Housing and Lifetime Homes Planning Advice Note.</p> <p>Amend Footnote 206: #Housing built to standards to cater for various lifestyle stages, e.g. wider corridors to cater for pushchairs and wheelchairs, scope for adaptations for disability need, needs of the elderly etc. Optional, enhanced accessibility requirements are set out in Part M of the Building Regulations.</p>	In response to Further Matter 3 – consistency with national policy.
PM121	CP15 Heritage, page 192	<p>4.166 The City's rich architectural heritage encompasses... numerous local listed buildings heritage assets and over 80 aArchaeologically sensitive areas Notification Areas²¹¹.</p>	update
PM099	CP16 Open Space, page 194	<p>Planning permission resulting in the loss of open space, including the beach, will not be granted unless will only be granted where:</p> <p>Delete d) d) The site is physically incapable of meeting the city's wider open space needs; is not part of the beach or a playing field (current or historical) and, in accordance with the Open Space Study Update 2011, is of a poor quality (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub-area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be</p>	Clarification in response to Proposed Modification Consultation comments.

		<p>considered.</p> <p>Replace with: d) The site is :</p> <ul style="list-style-type: none"> • physically incapable of meeting the city’s wider open space needs; • is not part of the beach or a playing field (current or historical) and, • in accordance with the Open Space Study Update 2011 (or subsequent approved revisions), is of a poor quality without potential for improvement (current and potential) and there is an identified surplus (current and future) in all types of open space within the locality (ward and sub area). In order to test the importance of the site to the local community the site must be actively marketed at a price that reflects its use, condition and local market prices for at least a year with no success before alternative proposals can be considered. <p>...</p> <p>Add at the end of section 1:</p> <p><u>e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p>	
PM102	CP17 Sports Provision, page 200-201	<p>... Planning permission resulting in the loss of indoor and outdoor sports facilities and spaces will not be granted except where:</p> <p>Amend penultimate part to section 2:</p> <p>In respect of <u>outdoor sports facilities and spaces</u>sports open space:</p> <ul style="list-style-type: none"> • The land has been marketed as detailed above and the proposal complies with the Open Space policy (CP16). 	Clarification in response to Proposed Modification Consultation comments.

Add at the end of section 2:

The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.

...

5. Require new development to contribute to the provision and improvement of the quality, quantity and accessibility of sports services, facilities and spaces to meet the needs it generates in accordance with the local standards set out below (or subsequent approved revisions **and/or approved assessments/strategies) (See also CP7 Infrastructure and Developer Contributions).**

...

Standard for Indoor and Outdoor Sports Facilities	
Indoor Sports	
Quantity (indoor sport)	
Modelling undertaken in line with Sport England parameters. Standards to comply with national best practice.	The Open Space, Sport and Recreation Study recommends the council should aim to provide a new multi-sports wet/dryside leisure centre (in addition to the replacement of provision currently provided for the King Alfred Leisure Centre) and indicates a further potential need for additional pool space and indoor sports halls. The study also indicates a demand for an indoor arena and ice

rink (See also the Sports Facility Plan for further recommendations).

Accessibility (indoor sport)

Standards to comply with national best practice.

Quality (indoor sport)

All facilities should be built or provided in accordance with national best practice

Outdoor Sports

Quantity (outdoor sport)

Current Provision	Current Provision (Ha/1,000 pop)	Proposed Standard (Ha/1,000 pop)	Additional Space required by 2030 ²¹⁵
Approx 118.5 Hectares	0.47	0.47	Approx 20 to 23 <u>15.5 to 28</u> hectares

Accessibility (outdoor sport)

20 minute walk time (960 metres)

Quality (outdoor sport)

Clean, litter-free sports facilities should be provided with appropriate, well drained, well maintained surfaces. Ancillary accommodation should include toilets, changing facilities, dog waste bins and litter bins and appropriate amenity and sports lighting.

Standard for Indoor and Outdoor Sports Facilities

All sites should meet the minimum specifications of the appropriate National Governing Body of sport and meet Equality Act 2010 guidance.

Amend footnote 215:

²¹⁵Applying a 2030 population figure of 310,900, based on ONS 2012-based Subnational Population Projections, an additional 27.6 hectares of outdoor sport space will be required. However, when the indicative generated demand of the City Plan's housing target of 13,200 residential units is calculated

		(using the council's excel open space standards calculator and by assuming an average unit size of 2 bedrooms) an additional 15.5 hectares is required. The difference between the two figures is considered to be due to the accumulative quantitative shortfall in outdoor sport arising since the base year of 2006 and also the potential of the housing target to restrict growth in population. ONS stands for Office for National Statistics. Based on information in the Office for National Statistics 2010-based Sub National Population Projections March 2012 and 2011-based interim projections covering 2011-2012 (published Sept 2012) – initial release of 2011 Census Data. Applying the respective 2030 projection figure of 299,777 an additional 22.9 hectares will be required however on the assumption that the City Plan housing targets will restrict the growth in population to 292,886 this will reduce the additional outdoor sport requirement to 19.66 hectares. The population figures are detailed and explained further in the Housing Requirements Study (Update of 2011 HRS Study).	
PM108	CP21 Student Accommodation and Houses in Multiple Occupation, page 219	<p>4.225 The city's educational establishments and their students make an important contribution to the economic and cultural life of the city. There are approximately 35,200 37,000 students at the Universities of Brighton and Sussex, which includes 4,000 5,200 international students from non EU countries# 150 countries. Many students also attend...</p> <p>Insert new footnote:</p> <p># HESA 2011/12</p> <p>Add before penultimate sentence in 4.227</p> <p><u>In considering the effect of new development on residential amenity, this will include an assessment of the cumulative impact of other existing and proposed purpose-built student housing schemes close to the application site.</u></p>	Clarification in response to Proposed Modification Consultation comments.
PM106	Policy CP19 Housing Mix, page 209, 210	<p>Amend proposed new criterion a. iii) to the policy:</p> <p>iii) introduce dwelling space <u>Seek to apply the requirements of the nationally described space</u> standards in Part 2 of the plan to secure quality and sustainability in new residential development.</p>	In response to Further Matter 3 – consistency with national policy.

		<p>Insert new penultimate sentence within paragraph 4.202: 4.202 ... and the need for developments to be inclusive, adaptable and accessible is addressed in CP12 Urban Design. Part 2 of the plan will, <u>subject to evidence of need and impact on viability, include a development management policy relating to requiring the nationally described space standard</u> introduce minimum dwelling space standards, similar to those of the GLA or compatible with those emerging from the government's 2013 Housing Standards Review. This policy and those ...</p>	
PM122	Policy CP20 Affordable Housing, page 213, 215	<p>CP20 Affordable Housing</p> <p>The Council will require the provision of affordable housing²³⁴ on all sites of <u>5 11 or more dwellings (net) (or of more than a combined gross floorspace of 1000sqm)</u>[#] and will negotiate to achieve the following affordable housing targets:</p> <p>a) 40% onsite affordable housing provision on sites of 15 or more (net) dwellings;</p> <p>b) 30% onsite affordable housing provision on sites of between 10 11 and 14 (net) dwellings or as an equivalent financial contribution;</p> <p>c) 20% affordable housing as an equivalent financial contribution on sites of between 5 and 9 (net) dwellings.</p> <p>²³⁴ The definition of affordable housing is that as set out in the National Planning Policy Framework [#] As set out in Para 12 http://planningguidance.planningportal.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/</p>	In response to Further Matter 3 – consistency with national policy.
PM123	Policy CP20 Affordable Housing, page 213, 215	<p>4.218 When setting targets for t <u>The delivery of affordable housing from new development of 11 units or more (as per the requirements of National Policy[#]), the city council considers that the most pragmatic approach is <u>to require that all new suitable residential development (as defined with reference to the site size</u></u></p>	In response to Further Matter 3 – consistency with national policy.

		<p>thresholds set out in the policy) to provide a viable and deliverable proportion of affordable housing or (where appropriate) an equivalent financial contribution in lieu of onsite provision which can be used to help enable the further provision of affordable housing elsewhere in the city.</p> <p>4.219 Drawing on the findings of the council’s most recent Affordable Housing Development Viability Study²⁴² and taking account of a number of considerations (for example, the city’s housing land supply, housing market trends, local needs and affordability, together with wider planning obligations) the council will aim to achieve onsite provision of affordable housing on all suitable larger development sites (40% on sites of 15 units or more and, where practicable, 30% on sites of between 10-11 and 14 units). and a financial contribution equivalent to a lower target quota of 20% on smaller development sites of between 5 and 9 units.</p> <p>Insert new footnote:</p> <p>#http://planningguidance.planningportal.gov.uk/blog/guidance/planning-obligations/planning-obligations-guidance/</p> <p>²⁴² Affordable Housing Development Viability Study, March 2012.</p>	
PM124	Annex 3: HIS Page 95, Paragraphs 7.4 – 7.5.	<p>Recession Measures</p> <p>7.4 There is recognition that in certain circumstances s106 planning obligation requirements may impact on the viability and deliverability of a development. Therefore tThe Council has been responsive to the need for flexibility in the early years of the Plan short term to reflect current market conditions and has will negotiated d with developers in such situations.</p> <p>7.5 In response to the economic downturn, in early 2010, the Council introduced a range of temporary ‘recession’ relief measures that prioritised and allowed for reductions in certain types of s106 planning obligations where issues of viability /</p>	Update.

		<p>deliverability were raised. These temporary measures provide flexibility on securing provision towards necessary infrastructure provision in order to enable development to be acceptable and to proceed in a timely manner. The temporary relief measures were reviewed in 2014 and revoked January 2015. The measures had will be reviewed in 2014. The current recession relief measures included:</p> <ul style="list-style-type: none"> ▪ Free of charge pre-application advice service; ▪ Deferring or allowing for phased payment of contributions on major schemes, or deferred of payment of contributions or provision of infrastructure to a later date in the development or on occupation of the development; ▪ Reduction in the type and level of contributions being sought by suspending requirements for financial contributions to sustainable building and nature conservation; ▪ Waiving “indexation” on financial contributions so that infrastructure payments due are not updated to current prices; ▪ Changing the threshold level at which sustainable transport contributions are sought so that a lesser percentage of developments would be liable. ▪ Suspending seeking financial contributions towards Sustainable Buildings and Nature Conservation measures. Contributions will instead focus on securing best quality development design. 																						
PM125	Annex 3: HIS, Appendix B, Option B, page 105	<p>Option B: Accommodating shortfall over full plan period to 2030 on an annualised (residual) basis.</p> <table border="1" data-bbox="582 1082 1720 1348"> <tr> <td>A</td> <td>Housing target for the plan period (2010 – 2030)</td> <td>13,200</td> </tr> <tr> <td>B</td> <td>Completions 2010 - 2014</td> <td>1,402</td> </tr> <tr> <td>C</td> <td>Residual housing target 2014 – 2030 (A-B)</td> <td>11,798</td> </tr> <tr> <td>D</td> <td>Annualised housing target 2014 – 2030 (C/16)</td> <td>737</td> </tr> <tr> <td>E</td> <td>Five year target, no adjustment (D x 5)</td> <td>3685</td> </tr> <tr> <td>F</td> <td>Buffer (5%)</td> <td>184</td> </tr> <tr> <td>G</td> <td>Five year requirement incorporating buffer</td> <td>3689-3869</td> </tr> </table>	A	Housing target for the plan period (2010 – 2030)	13,200	B	Completions 2010 - 2014	1,402	C	Residual housing target 2014 – 2030 (A-B)	11,798	D	Annualised housing target 2014 – 2030 (C/16)	737	E	Five year target, no adjustment (D x 5)	3685	F	Buffer (5%)	184	G	Five year requirement incorporating buffer	3689-3869	Editorial – correction.
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		(E+F)		
		H	Annual target for next 5 years (2014 – 2019) (G/5)	774
		I	Current expected deliverable supply 2014/15 – 2018/19	3441
			a) Supply identified in 2014 SHLAA	3276
			b) Other windfall sources (pdr)	110
			c) Other small site development (non pdl)	55
		J	Gap (G-I)	-248 428
		K	Years supply equivalent to (I/H):	4.4 years supply



**Brighton & Hove
City Council**