

City Plan Part Two

Sustainability Appraisal

Scoping Report

June 2016



Brighton & Hove
City Council

Contents

Section 1		
Introduction		
1.1	Requirement for SA and SEA	4
1.2	City Plan Part 2	6
1.3	Purpose of the SA Scoping Report	6
1.4	SEA Regulations Requirements	7
1.4	Layout of the Scoping Report	8
Section 2		
Consultation		
2.1	Introduction	10
2.2	Consultation Questions	10
2.3	How to Comment	11
Section 3		
Topic Chapters		
3.0	Introduction	12
3.1	Biodiversity & Geodiversity	13
3.2	Water Quality and Resources	25
3.3	Soil, Waste and Land Resources	33
3.4	Air Quality and Transportation	41
3.5	Climate Change and Flooding	59
3.6	Cultural Heritage, Landscape and Open Space	71
3.7	Population, Human Health & Inequalities	87
3.8	Housing & Community	106
3.9	Local Economy, Employment, Skills and Education	120
Section 4		
SA Framework & Methodology		
4.1	Introduction	140
4.2	SA Framework – Policies	140
4.3	Methodology	144
4.4	SA Framework - Sites	145
Section 5		
Next Steps		
5.1	Consultation period	153
Appendices		
	A – Plans, Policies and Guidance	154
	B – Baseline Information and Indicators	193
	C – Copy of Consultation Response Form	204
	D - Maps	208

List of Maps

1. Special Area of Conservation
2. Sites of Special Scientific Interest
3. Local Nature Reserves (declared)
4. Local Nature Reserves (proposed)
5. Sites of Nature Conservation Importance
6. Groundwater Source Protection Zones
7. Road Noise Mapping – daytime
8. Tidal flood risk
9. Surface Water Flood Risk 1 in 30 year event
10. Surface Water Flood Risk 1 in 200 year event
11. Conservation Areas
12. South Downs National Park

List of Figures

1. Stages of SA/SEA and plan-making
2. Map of Biosphere Region
3. Groundwater Levels at Ladies Mile 2014-2016
4. Brighton, Hove and Portslade AQMA 2013
5. Rottingdean AMQA 2013
6. Nitrogen Dioxide levels 1997-2013
7. Groundwater Levels at Ladies Mile Jan to April 2014
8. Surface Water Flood Risk Hotspots
9. Population by 5 year age bands (Census 2011)
10. Index for Multiple Deprivation 2015 – all domains
11. Net housing completions 2010-2015
12. Affordable housing completions 2010-2015
13. Gains and losses in employment floorspace 2014/2015

Section 1 Introduction

1.1 Requirement for Sustainability Appraisal and Strategic Environmental Assessment

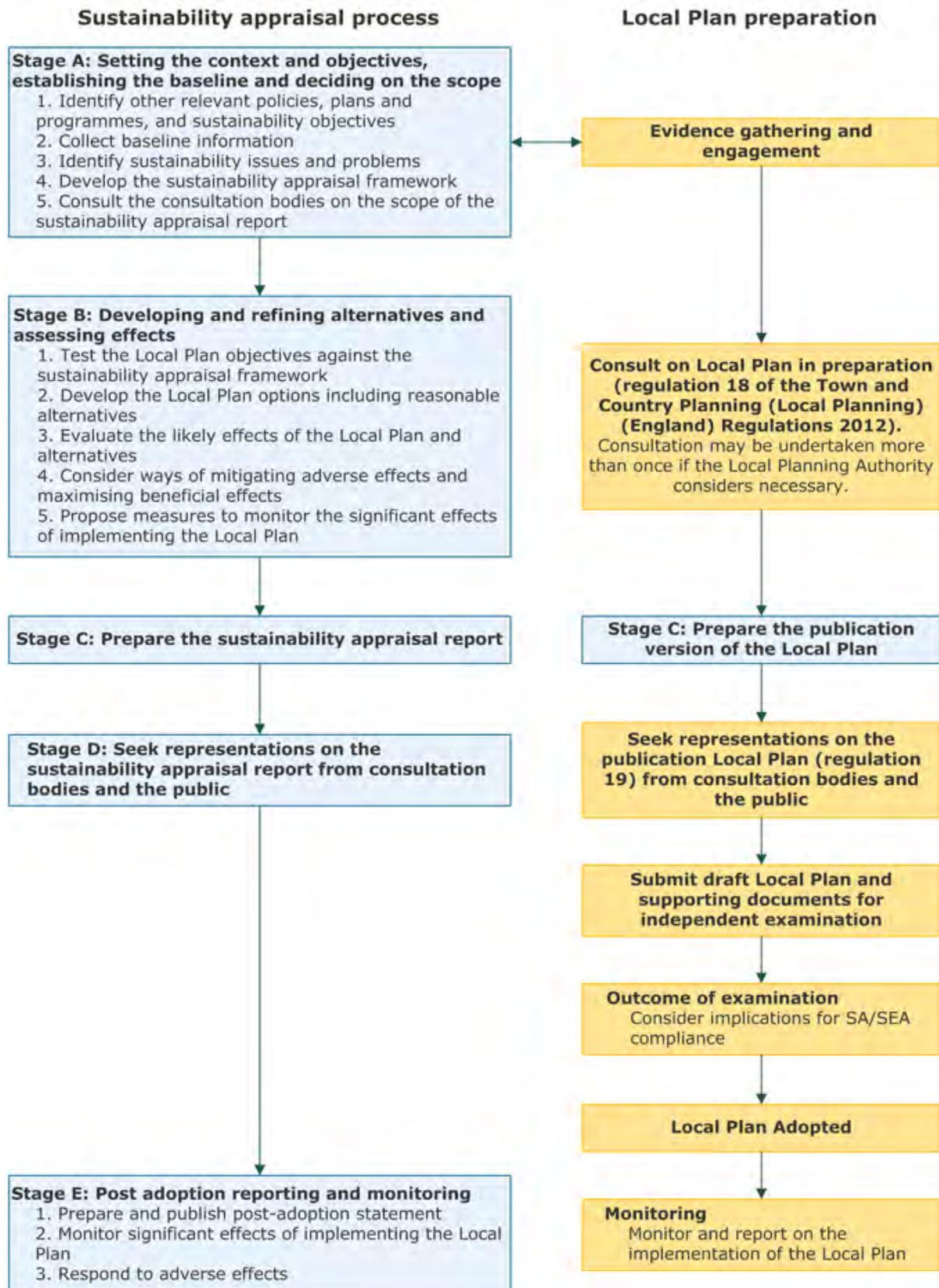
- 1.11 The Planning & Compulsory Purchase Act 2004 requires that a Sustainability Appraisal (SA) is carried out for all Development Plan Documents (DPD). As the City Plan Part 2 sets a framework for development consent of projects that are likely to have significant environmental effects, a Strategic Environmental Assessment (SEA), as required by European Directive EC/2001/42 and the relevant Regulations¹ is also necessary. The National Planning Policy Framework (NPPF) also states that an SA, incorporating the requirements of the SEA Directive, is integral to the plan making process².
- 1.12 SA is a systematic and iterative process that attempts to predict and assess the economic, environmental and social effects that may arise from a plan, with a view to avoiding and mitigating adverse impacts and maximising positive impacts where appropriate. It plays an important role in demonstrating that a DPD is contributing towards sustainable development through the integration of environmental, social and economic considerations into the DPD.
- 1.13 SEA introduces a systematic assessment of the environmental effects of plans or programmes, including land use plans. Its objective is *“to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development, by ensuring that, in accordance with the Directive, and environmental assessment is carried out on certain plans which are likely to have significant effects of the environment.”* It also requires the consideration of reasonable alternatives, to help demonstrate that the final plan is the most sustainable approach.
- 1.14 Although the requirements of SA and SEA are distinct, a single joint appraisal incorporating SA and SEA requirements can be carried out, in accordance with National Planning Practice Guidance³, ensuring that all issues are considered. The stages of SA/SEA and relevant stages of plan-making are illustrated in Figure 1.

¹ [The Environmental Assessment of Plans and Programmes Regulations 2004](#)

² [NPPF paragraph 165](#)

³ [NPPG](#)

Figure 1 Stages of SA/SEA and plan-making
 (Taken from NPPG paragraph 013)



1.2 City Plan Part Two

- 1.21 Brighton & Hove City Council is the local planning authority responsible for preparing the development plan for the city. The development plan currently consists of the City Plan Part One (adopted March 2016) and saved policies from the Local Plan (2005). The City Plan Part One sets the overall strategy for the development and growth of Brighton & Hove up to 2030, identifies broad locations for development and allocates strategic sites. The City Plan Part One also sets some policies that guide decisions on planning applications.
- 1.22 The City Plan Part Two will allocate non-strategic sites for various uses, such as housing, employment and community uses and will also include more detailed policies that will be used for the determination of planning applications. Once adopted, the City Plan Part Two will replace the saved policies from the Local Plan 2005, and together with the City Plan Part One, will form the Development Plan for the city.

1.3 Purpose of the Scoping Report

- 1.31 A Scoping Report was originally produced in 2005 for the emerging Core Strategy, which was then replaced by the City Plan. This Scoping Report has been updated so that the baseline information, evidence and analysis are considered to be as up to date as possible in order to inform the plan production process of the City Plan Part Two.
- 1.32 Scoping is the process of deciding the scope and level of detail of an SA, including the relevant background and issues, the assessment methods to be used and the structure and contents of the SA Report. Documenting this process, the Scoping Report sets out the scope of, and methodology for the SA and summarises the tasks and outcomes of the first stage of the SA process.
- 1.33 The Scoping Report is considered as Stage A in the SA process as shown in Figure 1. It involves the development of the SA objectives which form a framework for undertaking the appraisals, as well as setting out an informed evidence base, sustainability context and identification of sustainability issues. The Scoping Report is then made available for consultation with stakeholders.
- 1.34 Stage A can be broken down into the following 5 key tasks:
- **A1 – Context:** Identifying other relevant policies, plans and programmes and sustainability objectives to document how the plan is affected by outside measures.
 - **A2 – Baseline Information:** Collecting data and baseline information to provide an evidence base for sustainability issues, effects, prediction and monitoring.
 - **A3 – Sustainability Problems:** Identifying sustainability issues and problems from the context and baseline review to help focus the Sustainability Appraisal

- **A4 – SA Framework:** Developing the SA Framework consisting of objectives based on the issues identified during the context and baseline review to provide a means by which the sustainability of the plan can be appraised.
- **A5 - Consultation:** Consulting on the scope of the SA to ensure the appraisal covers the key sustainability issues.

1.4 Strategic Environmental Assessment Regulations Requirements

The Scoping Report must also meet the requirements of Regulation 12 (5) and Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). The following table shows the links between the Stages 1-5 of SA and Requirements 1-5 of Schedule 2 of the SEA Regulations where relevant.

Table 1: Link between SA and SEA Requirements

Regulation	SEA Requirements	Stage of SA / SA Requirement
Schedule 2 (1)	An outline of the contents, main objectives of the plan or programme and its relationship with other relevant plans of programmes	A1 – Context Review
Schedule 2 (2)	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	A2 – Baseline Information
Schedule 2 (3)	The environmental characteristics of areas likely to be significantly affected	A2 – Baseline Information
Schedule 2 (4)	Any existing environmental problems which are relevant to the plan or programme including in particular those relating to any areas of environmental importance, such as those designated under Directives 79/409/EEC (wild birds) and 92/43/EEC (habitats)	A3 – Sustainability Problems
Schedule 2 (5)	The environmental protection objectives, established at international, community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	A1 – Context Review
12 (5)	When deciding on the scope and level of detail of the information that must be included in the report, the responsible body must consult the consultation bodies.	A5 - Consultation

- 1.42 Schedule 2 of the Regulations also sets out the following issues that need to be considered:
- a) Biodiversity
 - b) Population
 - c) Human Health
 - d) Fauna
 - e) Flora
 - f) Soil
 - g) Water
 - h) Air
 - i) Climatic Factors
 - j) Material Assets
 - k) Cultural Heritage
 - l) Landscape

1.5 Layout of the Scoping Report

- 1.51 This Scoping Report has been broken up into themed topic chapters covering various issues. The topic chapters incorporate the issues listed in (a) to (l) above as required by Schedule 2 of the SEA Regulations, as well as any other relevant socio or economic sustainability topics as required by the SA process. The topic chapters and relevant SEA issues are shown in the following table. There are many areas of cross-over however issues have been separated into main themes where possible.

Table 2: Sustainability topic chapters and relevant SEA issues

Topic Chapter	Title	SEA issues addressed
1	Biodiversity & Geodiversity	a) Biodiversity d) Fauna e) Flora f) Soil
2	Water Quality and Resources	g) Water
3	Soil, Waste and Land Resources	f) Soil j) Material Assets
4	Air Quality and Transportation	h) Air
5	Climate Change and Flooding	i) Climatic Factors
6	Cultural Heritage, Landscape and Open Space	k) Cultural heritage l) Landscape
7	Population, Human Health & Inequalities	b) Population c) Human health
8	Housing & Community	b) Population j) Material assets
9	Local Economy, Employment, Skills and Education	b) Population j) Material assets

1.52 Each topic chapter is presented in a similar way and contains the following information in order to ensure the regulatory requirements for both SEA and SA are met:

- Introduction
- Context review
- Current baseline
- Likely future baseline
- Key sustainability issues
- Data limitations
- Suggested Sustainability Objectives and Decision-Making Criteria for a) policies and b) sites

Section 2 Consultation

2.1 Introduction

2.11 The SEA Regulations requires statutory environmental bodies to be consulted at Stage A5 on the scope of the environmental report and again during public consultation at Stage D1 on the plan and report. In accordance with Regulation 4 (1) of the SEA Regulations, Historic England, the Environment Agency and Natural England are the statutory Environmental Consultation Bodies for England. In addition, the Scoping Report will be made widely available, in accordance with the adopted Brighton & Hove Statement of Community Involvement, to allow others to comment.⁴

2.2 Consultation Questions

2.21 Please see the “How to Comment” section 2.3 for details on how to submit your comments and Appendix C for a copy of the formal consultation response form.

2.22 The following consultation questions are included within the formal consultation response form and should be used to guide a response. Questions should be completed for each topic chapter that you are commenting on:

1) Context Review and Appendix A

Are there any other documents that should be referred to as part of the Context Review?

2) Baseline Data, Indicators and Appendix B

Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

3) Sustainability Issues

Does the Sustainability Issues section adequately address the main issues?

Sustainability Appraisal Framework

4) Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations?

5) Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

⁴ [BH Statement of Community Involvement 2015](#)

- 6) Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

2.3 How to comment

- 2.31 Responses to this consultation should be made in writing preferably using the formal representation form which can be completed online via the Council's consultation portal. A copy of this form can be found in Appendix C for information.
- 2.32 You are also able to comment by email or letter, but please provide your personal contact details, or your agent's details, and focus your comments on questions outlined above.
- 2.33 This Scoping Report, City Plan Part 2 Scoping Document and copies of the response forms are available on the Council's website and within customer service centres at Hove Town Hall and Bartholomew House Brighton and at Jubilee, Hove and Portslade libraries.

<https://www.brighton-hove.gov.uk/content/planning/planning-policy/city-plan-part-two>

- 2.34 Consultation will run for **12 weeks from 30 June to 22 September 2016**.

- 2.35 Comments should be returned to Brighton & Hove City Council preferably using the consultation portal or by email:

Council's Consultation Portal: <http://consult.brighton-hove.gov.uk/portal>

Email: planningpolicy@brighton-hove.gov.uk

Post: Planning Policy
Brighton & Hove City Council
Room 201
Kings House
Grand Avenue
Hove
BN3 2LS

Section 3 Sustainability Topic Chapters

3.0 Introduction

3.01 Section 3 is separated into the following topic chapters:

1. Biodiversity & Geodiversity
2. Water Quality and Resources
3. Soil, Waste and Land Resources
4. Air Quality and Transportation
5. Climate Change and Flooding
6. Cultural Heritage, Landscape and Open Space
7. Population, Human Health & Inequalities
8. Housing & Community
9. Local Economy, Employment, Skills and Education

3.02 This section covers stages A1, A2, A3 and A4 of the Sustainability Appraisal process as outlined in Section 1.

3.03 Each of the sustainability topic chapters follows the same format to ensure the SA and SEA requirements are met for each topic chapter.

- Introduction
- Context review
- Current baseline
- Likely future baseline
- Key sustainability issues
- Data limitations
- Suggested Sustainability Objectives and Decision-Making Criteria

3.04 In addition, the full details of the context review can also be found in Appendix A and a summary of Baseline Data and Indicators can also be found in Appendix B. A full SA Framework showing all the SA Objectives can be found in Section 4.

3.1 Topic 1: Biodiversity & Geodiversity

3.11 INTRODUCTION

3.11.1 Biodiversity is a key component to support life on the planet and plays a vital role in adaptation to a changing environment. It provides a number of “ecosystem services”, such as maintaining clean water, fertile soil and clean air, as well as providing fuel and food thereby providing both direct and indirect economic and social benefits as well as environmental benefits.

3.11.2 The main threats to biodiversity are associated with human activities causing habitat loss/damage, loss of biodiversity, loss of protected species, disturbance to and pollution of ecosystems, risk to unprotected habitats and the impact of climate change. The lack of habitat management or neglect can also have a detrimental impact on their ecological value.

3.11.3 Geodiversity is the variety of rocks, fossils, minerals, natural processes, landforms and soils that underlie and determine the character of our landscape and environment.

3.11.4 This section provides baseline information on the current state of the environment in regards to biodiversity. It also includes information on geodiversity. It outlines the policy context, and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, a Sustainability Appraisal Objective is proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.11.4 Maps to support this section can be found in Appendix D.

3.12 CONTEXT REVIEW

3.12.1 Key documents reviewed:

- EU Birds Directive
- EU Habitats Directive
- Natural Environment & Rural Communities Act (2006)
- Natural Environment White Paper (2011)
- Wildlife & Countryside Act (1981)
- Countryside & Rights of Way Act (2000)
- Biodiversity 2020 (2011)
- NPPF (2012)
- City Sustainability Action Plan (2015)
- Sustainable Community Strategy (2014)
- Brighton & Hove Local Biodiversity Action Plan (2013)
- A Green Network for Brighton & Hove (2009)
- Brighton & Lewes Downs Biosphere Management Strategy 2014-19 (2013)

3.12.2 The key sustainability objectives and messages coming from the context review are to:

- Protect, conserve and enhance the natural environment
- Minimise impacts on biodiversity, with net gains in biodiversity to be provided wherever possible
- Take into account and conserve local priority species and habitats
- Guide development to locations which reduce adverse impacts on biodiversity
- Enable development to enhance and link to natural networks, including the green network and Nature Improvement Area and promote biodiversity conservation
- Include policies for the conservation and enhancement of locally and nationally designated sites and provide criteria against which developments affecting designated sites will be addressed.
- Help to deliver the aims of the Brighton & Lewes Downs Biosphere, (which for nature conservation are to “improve important local wildlife habitats and species, and precious environmental resources such as water, through better downland and floodplain management, enhanced landscapes and urban spaces, and new marine conservation initiatives”).
- Increase awareness and understanding and engagement with/of local biodiversity and the natural environment

3.13 CURRENT BASELINE

Nature Conservation Designations

3.13.1 A large proportion of the land within Brighton & Hove is subject to a nature conservation designation. The following table sets out the proportion of the city that is within a protected area.

Table 2: Area and Type of Nature Conservation Designations

Designation	Terrestrial		Coastal	
	Area (ha)	Area as a % of B&H total area	Area (ha)	Area as a % of B&H total area
SAC/SSSI	71.2	0.8	67.6	0.8
LNR/pLNR	690	8.2	0	0
LWS (SNCIs)	578.2	6.9	34.1	0.4
Total	1339.4	15.9	101.7	1.2

Special Areas of Conservation (SAC)

3.13.2 Castle Hill, located just outside Woodingdean, is of European importance, having been designated a Special Area of Conservation (SAC) under the Habitats Directive 1992⁵. It is also of UK importance as is designated as a Site of Special Scientific Interest (SSSI). It is also a National Nature Reserve (NNR).

⁵ [Habitats Directive 92/43/EEC](#)

3.13.3 It is described as one of the best examples in East Sussex of the nationally uncommon chalk grassland habitat. It was designated in 2005 as chalk grassland with a mosaic of calcareous semi-natural dry grassland communities. It contains an important assemblage of rare and scarce species including early spider orchid (one of the largest colonies in the UK), early gentian and burnt orchid.⁶

3.13.4 The various units of Castle Hill SSSI have been surveyed by Natural England between 2009 and 2015. Overall it is in 100% favourable/unfavourable recovering condition (43% of units favourable; 57% of units unfavourable recovering condition).⁷ There has been a long term improvement of the condition of the site.

Other Sites of Special Scientific Interest (SSSI)

3.13.5 The other SSSI in Brighton & Hove is the Brighton to Newhaven Cliffs SSSI stretches from the Black Rock site at Brighton Marina to Newhaven.

3.13.6 The main interest of the site is geological with the cliffs providing the best and most extensive exposure of the *Offaster pilula* Zone in England. Black Rock is a key section of outstanding importance for Quaternary Stratigraphy. An area of the cliff at Saltdean provides probably the finest example of conjugate normal faults in the Chalk of southern England.⁸

3.13.7 The site also includes some rare and uncommon plants which grow both on the cliff face and in the narrow strip of cliff-top chalk grassland. The cliffs support a locally important colony of breeding seabirds and a diverse community of beetles.

3.13.8 According to the latest survey (Natural England 2014), Brighton to Newhaven Cliffs is in 100% favourable/unfavourable recovering condition (91% of units favourable; 9% of units unfavourable recovering condition).⁹ There has been a long term improvement of the condition of the site.

Local Nature Reserves

3.13.9 Brighton & Hove City Council has declared a number of Local Nature Reserves. These are statutory wildlife sites designated under the National Parks and Access to the Countryside Act 1949. There are eight either designated or proposed Local Nature Reserves in the city: Bevendean Down, Beacon Hill, Benfield Hill, Ladies Mile, Stanmer Park, Whitehawk Hill, Wild Park and Withdean Woods. All the LNRs have ecological and landscape interests and all form important green spaces used for recreational purposes. Some but not all of the LNRs have management plan.

⁶ [Taken from SAC citation](#)

⁷ [Natural England Assessment](#)

⁸ [Taken from SSSI citation](#)

⁹ [Natural England Assessment](#)

Table 3: Local Nature Reserves

LNR/pLNR	Main interest/reason for designation	Priorities
Bevendean Down (proposed)	A cluster of species-rich chalk grassland, scrub and woodland sites located within the SDNP.	No management plan. To maintain the chalk grassland, sheep are grazed on the site in order to prevent shrub encroachment.
Beacon Hill (declared)	Site supports chalk grassland and a range of plants and butterflies. Site entirely situated within SDNP and includes Rottingdean Windmill.	No management plan. To maintain the chalk grassland, sheep are grazed on the site in order to prevent shrub encroachment.
Benfield Hill (declared)	10ha site located within the SDNP containing gentle and more steeply sloping areas which support chalk grassland and scrub. The LNR also supports a large population of slow-worms. Located outside the A27.	Management Plan. The main objective is to maintain the sward of the chalk grassland of varying heights to ensure that habitat requirements of notable species are maintained. This is mainly achieved through sheep grazing. Other objectives include: <ul style="list-style-type: none"> • To manage existing scrub and woodland, and • To maintain and enhance the area for recreation
Ladies Mile (declared)	14ha site stretching from Ladies Mile Road in Patcham to the top of Carden Avenue. An important green corridor situated within the urban area linking to Stanmer Park. Contains a flat area of chalk grassland including large areas of Horse-show Vetch and Kidney Vetch. Areas of scrub of steeper slopes and a small woodland area. Also contains Bronze Age burial mound and Celtic field systems.	No management plan. Consultation undertaken in 2013 suggested grazing of the site to maintain the chalk grassland which has since been implemented. Other priorities include: <ul style="list-style-type: none"> • Promote quiet recreation • Encourage community involvement • Protect the landscape and the importance as a gateway to the SDNP
Stanmer Park (proposed)	Located within the SDNP, Stanmer Park is Brighton & Hove's largest area of parkland. Also a Registered Park & Garden consisting of a mixture of habitats including mixed deciduous woodland and open areas. The Stanmer Park LNR also includes a section of woodland in Coldean, located across the A27 bypass.	Long term master plan – Stanmer Estate Restoration Project currently being developed. Aims include: <ul style="list-style-type: none"> • Restoration of historic buildings • Enhancement of natural features • Improve the environment • Improve access • Increase opportunities for education • Ensure management reflects the needs of park users
Whitehawk Hill	Site containing ancient species-	Management Plan in development.

LNR/pLNR	Main interest/reason for designation	Priorities
(declared)	rich chalk grassland located within the SDNP. Includes Whitehawk Camp, a Scheduled Ancient Monument.	Priorities likely to include the management of scrub encroachment and restoration of chalk grassland habitats and development of a community orchard. Sheep are currently grazed on the site in order to prevent scrub encroachment.
Wild Park (proposed)	56ha site located within the SDNP consisting of a variety of habitats including lowland deciduous woodland, scrub, and lowland calcareous grassland.	Management Plan. To manage the encroachment of scrub and loss of chalk grassland, and strive to achieve a diverse mix of chalk grassland amongst a mosaic of other habitats.
Withdean Woods (declared)	A cluster of small woodlands along the London to Brighton railway line from Preston Park station north to Coney Hill. The mature woodlands support a rich variety of trees and provide valuable wildlife corridor situated within an urban area.	No Management Plan. Local resident group TWEACK help to look after the area with the following aims: <ul style="list-style-type: none"> • Encourage local school use • Provide information • Encourage community involvement • Improve access • Manage grassland • Survey flora and fauna • Identify circular routes • Develop nature trails

Local Wildlife Sites (Sites of Nature Conservation Importance)

3.13.10 The Council designated 62 sites as Local Wildlife Sites (LWS / formerly known as Sites for Nature Conservation Importance (SNCIs) in 1998. Sites are designated for their local importance for nature conservation but also due to the benefits they provide to the local community. The network of sites includes Black Rock and Volks Railway, which both have vegetated shingle species such as Sea Kale and Yellow-horned Poppy. Other LWS have species-rich chalk grassland with a range of orchids and other specialist plants and wildlife. Vegetated shingle and species-rich chalk grassland are nationally rare habitats listed in Annex 1 of the EC Habitats Directives as habitats of international conservation importance. A technical review of the SNCIs was carried out in 2013. This review will feed into the City Plan Part Two.

Marine Conservation Zone

3.13.11 The Beachy Head Marine Conservation Zone (MCZ) was designated in 2013 by Defra.¹⁰ This MCZ is a thin strip which extends from Brighton Marina to Beachy Head, East Sussex. Some of the western part of the MCZ falls

¹⁰ [Beachy Head MCZ Designation](#)

within Brighton & Hove. The designation aims to conserve the diversity of the nationally rare, threatened habitats and species to ensure they are in a favourable condition. Under the Marina and Coastal Access Act, local authorities are obliged to carry out their functions in a way that further the conservation objectives of a MCZ.

BAP Habitats and Species

3.13.12 The local Biodiversity Action Plan was adopted in 2013.¹¹ It contains 18 Species Action Plans and 15 Habitat Action Plans. The Species Action Plans include species which are UK BAP priority species, as well as species which are not a BAP priority species but are threatened or rare and have suitable breeding habitat in the city. There are Species Action Plans for the following 18 species. There are also numerous other species of importance which do not have their own Action Plan, as their needs can be addressed through a Habitat Action Plan.

Table 4: Species with Species Action Plans

Arable Annual Group	Short-snouted seahorse
Hoary Stock	Adder
Red-star Thistle	Herring Gull
Sea-Heath	Peregrine
White Helleborine	Starling
Brown-banded Carber Bee	Swift, Swallow House-Martin
Dingy Skipper	Bats Group
Hornet Robberfly	Hazel Dormice
White-letter Hairstreak	Lichen

3.13.13 The Habitat Action Plans include all fourteen of the UK BAP priority habitats which have a significant representation in the city. It also includes 'Parks and Gardens' which is not represented on the UK Priority list but which contains a substantial proportion of the biodiversity experienced by people in Brighton and Hove on a day-to-day basis. There are Habitats Action Plans for the following habitats.

Table 5: Habitats with Habitat Action Plans

Coastal Vegetated Shingle	Parks and gardens
Fragile Sponge and Anthozoan Communities on Subtidal Rocky Habitats	Urban Commons (incorporating Open Mosaic Habitats on Previously Developed Land national HAP)
Intertidal Underboulder Communities	Downland
Intertidal chalk	Farmlands [incorporating Arable Field Margins national HAP]
Maritime cliff and slopes	Hedgerows
Sheltered Muddy Gravels – subtidal sediments	Lowland calcareous grassland (including chalk scrub and waxcap colonies)
Subtidal chalk	Lowland Mixed Deciduous Woodland
Subtidal sands and gravels	Ponds

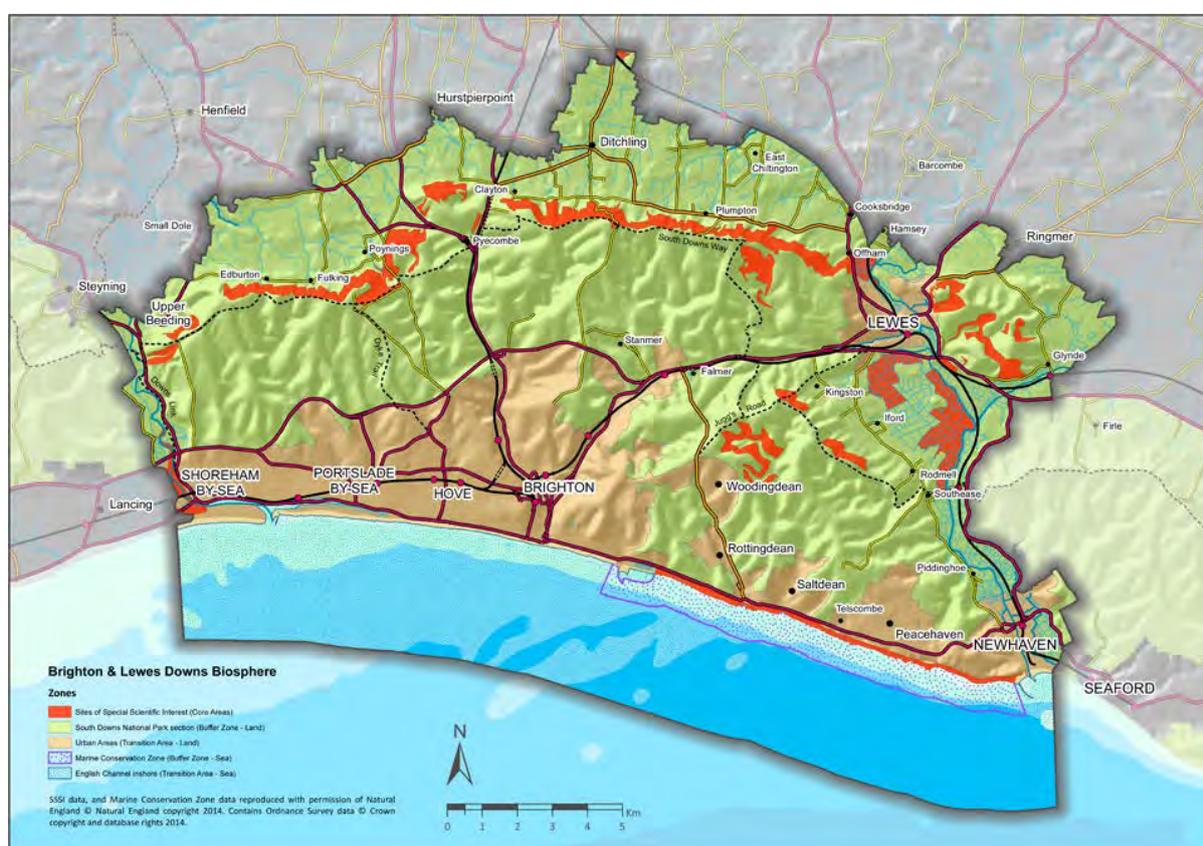
¹¹ [BH Biodiversity Action Plan](#)

3.13.14 The Action Plans set out the threats and opportunities for each species or habitat, and include a set of actions in order to deliver conservation objectives.

Biosphere Region

3.13.15 The Brighton & Lewes Downs Biosphere received the Biosphere Reserve status from UNESCO in 2014. The programme aims to develop a unified approach to better care for, manage and enjoy the local environment as an international demonstration area for sustainable development. It has the overall aim of *“creating a world-class environment, that is economically successful and enjoyed by all – forever”*.

Figure 2: Map of Biosphere Region
(image taken from <http://biospherehere.org.uk/>)



3.13.16 The Biosphere area covers almost 400 square kilometres across Brighton & Hove, and parts of Lewes and Adur districts as well as Mid Sussex and Horsham DCs. It consists of three zones: the Core Zone, which is internationally or nationally designated as a Special Area of Conservation (Castle Hill and Lewes Downs Special Areas of Conservation) or Site of Special Scientific Interest (a further 12 sites in our area); the Buffer Zone which surrounds and links to the Core Zone which consists of the local area of the SDNP on land and part of Beachy Head West Marine Conservation Zone in the sea; and the Transition Area which is the wider area of co-

operation where people live and work, which includes the main urban areas and wider sea area.

- 3.13.17 A number of projects are being delivered through the Biosphere programme which include, for example, pilot rain gardens in Portslade parks to help address flood risk. Projects and actions that support either nature conservation, sustainable socio-economic development, increased knowledge or an interconnected natural environment form the Biosphere Management Strategy 2014-19.

Geodiversity

Geological Sites¹²

- 3.13.18 Geological sites of interest have been identified under either the Geological Conservation Review (GCR) which commenced in the 1970s with a view to identifying and describing important geological sites, or through a survey of Regionally Important Geological Sites (RIGS) which took place in Sussex between 2010-2012.
- 3.13.19 The main geological interest in Brighton & Hove is the chalk cliff line to the east of Black Rock which runs through the Marina to Friars Bay. These are designated as two sites as follows: Black Rock GCR; and Coastal Section: Black Rock to Friars Bay which forms part of the Newhaven to Brighton GCR. Both of these form part of the Brighton to Newhaven Cliffs SSSI designation and are also designated a Regionally Important Geological Site (RIGS).
- 3.13.20 The GCR designation includes the following description:
“The Newhaven to Brighton GCR site consists of some 11 km of coastal cliffs and a wave-cut platform, from Newhaven in the east, to Kemptown, Brighton, in the west. These sections include several outstanding exposures of Upper Cretaceous (Upper Santonian-Lower Campanian) Chalk. They also demonstrate the effects of Quaternary processes, for example the dry valley cross-sections exposed between Brighton Marina and Peacehaven. The Chalk cliffs and wave-cut platform between Brighton Marina and Friar's Bay are the type locality for the Newhaven Chalk Formation of the White Chalk Subgroup, and its subdivision into beds and marker horizons. One of these marker horizons, Old Nore Marl - a vulcanogenic clay, can be correlated as far as northern Germany. The Upper Santonian Marsupites testudinarius Zone and the Santonian-Campanian boundary succession are superbly exposed at Black Rock.”
- 3.13.21 There are two other sites which are RIGS in Brighton & Hove: The Goldstone in Hove Park, which features a large sarsen stone and ten smaller stones; and Stanmer Village which includes many sarsen stones of various sizes.

¹² Information taken from <http://www.geodiversitysussex.org.uk/figgs.php>

3.14 LIKELY FUTURE BASELINE

- 3.14.1 There is diversity within the city in terms of habitat type and this will help to provide for a wide range of different flora and fauna.
- 3.14.2 The trend in the condition of internationally and nationally recognised sites appears to be improving over time, and some sites (LNRs mainly) that are locally protected have management plans or management controls in place to seek to maintain the special qualities of the sites.
- 3.14.3 Implementation of actions and projects arising from the BAP and the Biosphere programme has the potential to benefit local biodiversity.
- 3.14.4 However, there are a number of threats. The effects of climate change could be a threat to some sites, with an increase in summer temperature, milder winters, reduced rainfall, extremes of weather and changed seasonality having the potential to result in significant changes to habitat dynamics and species interactions.
- 3.14.5 Growth in leisure and recreation, travel patterns and pollution, including air pollution are also a threat to local biodiversity, as is habitat fragmentation. In addition, there is significant pressure from development which may result in loss of sites.
- 3.14.6 Unless new areas are created, there will be greater deficiencies in the amount of Natural/Semi-Natural open space available per person due to population increases, combined with and possible loss of sites to development.
- 3.14.7 In addition, there is a lack of resource which means there is no coordinated implementation of projects outlined in the BAP.

3.15 KEY SUSTAINABILITY ISSUES

3.15.1 The key sustainability issues identified from the context and baseline review are:

- There is a general overriding requirement to conserve and enhance biodiversity and geodiversity and prevent net loss
- The city contains one site with a European designation. Threats to this site include increased leisure and recreation use, increased water abstraction and increased air pollution, however it is noted that the HRA screening for the City Plan Part 1 discounted effects from being of significance.
- The city's SSSIs sites are in favourable or unfavourable/recovering condition. There is a need to avoid any detrimental impacts upon SSSI sites and seek to improve their condition further.

- The city contains a wealth of other locally designated sites as well as BAP habitats which require protection and sympathetic management in order to maintain their special qualities.
- Nature conservation sites provide a number of important functions beyond the protection of biodiversity which are often not recognised. The wider benefits of biodiversity need to be recognised, including
 - “ecosystem services”, such as absorption of water, helping to adapt to climate change, and absorption of air pollutants.
 - provision of areas of landscape beauty, having a visual and amenity role as well as contributing towards the local economy through tourism.
 - provision of areas for recreation and leisure having social benefits.
- There are localised deficiencies in the Natural/Semi-Natural open space typology, particularly in the central more urban areas of the city. The deficiency will increase in the future as the population increases unless new areas are developed. This is the open space typology where people are most likely to experience biodiversity.
- There is a significant development pressure, which could result in loss of biodiversity unless carefully managed
- There is a need to ensure any new habitats link into the existing Green Network/Nature Improvement Area. The Nature Improvement Area, or similar landscape scale approach should be retained and enhanced in order to help deliver net gains in biodiversity.
- There is a need to provide opportunities for increased understanding of the importance of biodiversity and access and engagement with it.
- Human use and climate change threaten the city’s nature conservation sites and biodiversity.

3.16 DATA LIMITATIONS

3.16.1 Sussex Biodiversity Records Centre contains a wealth of biodiversity data, however greater detail is known about some sites, which contrasts with limited data for other sites.

3.16.2 It is difficult to quantify or qualify all of the potential biodiversity and its value in the city because not all has a biodiversity designation, for instance Previously Developed Land, private gardens and parks.

3.17 SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.17.1 The following SA Objectives and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To protect, conserve and achieve a net gain in biodiversity.	<ul style="list-style-type: none"> • Protect and enhance international and national designated sites (e.g. SAC, SSSI, NNR, RIGS). • Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species. • Protect and prevent the loss of irreplaceable habitats such as Ancient Woodland. • Increase understanding and access to biodiversity/nature for local people. • Provide opportunities to achieve a net gain in biodiversity • Recognise the multi-functional benefits of ecosystem services provided by biodiversity and green infrastructure • Improve links between existing and/or new biodiversity and the Green Network/Nature Improvement Area

Sites

3.17.2 The following SA Objectives and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria and score (Will the site...)	
To protect, conserve and achieve a net gain in biodiversity.	++	PDL site; does not contain and is not adjacent to any nature conservation designations, nor does it contain any BAP priority habitats/species, nor sites with potential for nature conservation interest, and site offers potential for nature conservation enhancement.
	+	PDL site; does not contain and is not adjacent to any nature conservation designations, but has potential for some nature conservation interest. Site offers potential for nature conservation enhancement.
	0	Site would result in neither losses, nor gains for biodiversity and would have no impact on designated sites.
	-	Site contains a locally designated site (LNR, LWS or Ancient Woodland), or contains a local BAP habitat or species, or contains trees subject to a TPO. Or, site is a greenfield site with potential for some biodiversity interest.

	--	Site contains a nationally or internationally designated site (SAC, SSSI), or is within a SSSI Impact Risk Zone.
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3.2 Topic 2: Water Quality and Resources

3.21 INTRODUCTION

3.21.1 Effective planning and management of water resources is essential now and in the future in order to achieve sustainable development.

3.21.2 Brighton & Hove overlies a Principal Aquifer. This is an important source of public water supply which needs protecting in order to ensure water needs can be met. The South East region as a whole is classified as water stressed and is vulnerable to short-term drought events due to over 70% of the SE drinking water supply being from chalk groundwater sources.

3.22.3 The beaches of Brighton & Hove are an important recreational asset for local residents. They are also an important tourist attraction, with tourism contributing greatly to the local economy.

3.22.4 Human activities have the potential to pollute water. Industry, urban infrastructure, agriculture, transport and deliberate or accidental pollution incidents can affect water quality. Pollutants from these activities may enter surface, groundwater or bathing water directly, may run off the land or may be deposited from the atmosphere.

3.22.5 This section provides information on the current state of the environment in regards to water quality, including groundwater and bathing water, and water consumption. It outlines the policy context and attempts to identify the future evolution based on identified trends and accepted future change. At the end of the topic, a Sustainability Appraisal Objective is proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.22.6 Maps to support this section can be found in Appendix D.

3.22 CONTEXT REVIEW

3.22.1 Key documents reviewed:

- Water Framework Directive (2000)
- A Blueprint to Safeguard Europe's Water (2012)
- Water for Life (2011)
- Future Water (2008)
- NPPF (2012)
- Water Resources Strategy (2009)
- Flood & Water Management Act (2010)
- Adur & Ouse CAMS (2005)
- SE River Basin Management Plan (2009)
- Water Resources Management Plan 2015-2040 (2014)
- BH Surface Water Management Plan 2013
- BH Flood Risk Management Plan 2015

3.22.2 The key sustainability objectives and messages coming from the context review are to:

- To reduce pressure on water resources
- To ensure the sustainable use of water
- To encourage water efficiency measures
- To protect and improve water quality with groundwater to meet overall “good” status by 2027
- To avoid the pollution of water resources
- To improve flood risk management, including flooding from surface water and groundwater
- To ensure that flood risk is taken into account at all stages in the planning process, direct development away from areas of flood risk and ensure that flood risk is not increased elsewhere as a result of development

3.23 CURRENT BASELINE

Groundwater

3.23.1 The underlying geology of the city is the upper and middle chalk formations. The chalk ridges bound the city to the north and sweep gently down as chalk valleys into the city. The highly porous and permeable nature of the chalk has led to the designation of the Brighton Chalk Aquifer, a Principal Aquifer which is a major source of public water supply. Principal Aquifers provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale.

Groundwater Quality Status

3.23.2 The Water Framework Directive required the achievement of both good chemical and good quantitative status for surface waters and ground waters by 2015, which has been extended until 2021 or 2027 for those that could not reach that target. During the period 2009-2012 the Brighton Chalk Aquifer was classified as having good chemical status, however since 2013 has been classified as having poor chemical status. The quantity status has always been poor. Overall the status of the Brighton Chalk Aquifer is poor.¹³

3.23.3 The current poor quantitative status is due to the amount of water abstracted which exceeds the rate at which the aquifer recharges. The poor chemical status is based on a number of factors such as nitrate and pesticide contamination through farm practices. Contamination from highways, municipal and domestic pesticide use and leaking sewers is also a risk, as is saline intrusion.

Source Protection Zones

3.23.4 The Environment Agency has defined Source Protection Zones (SPZs) for 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity to

¹³ Environment Agency Catchment Data Explorer accessed April 2016

the source, the greater the risk. In Brighton & Hove there are seven Zone 1 SPZs, which are surrounded by Zone 2 and Zone 3 SPZs.¹⁴ These zones cover large extents of the city, including the urban area. Measures that prevent pollution need to be delivered within the SPZs.

Nitrate Vulnerability

3.23.5 Nitrate Vulnerable Zones are where land drains into nitrate polluted waters, or where waters could become polluted by nitrates. The entire city is in a nitrate vulnerable zone due to the vulnerability of the Brighton Chalk Aquifer to nitrate pollution. The use of nitrogen fertilisers and organic manures is restricted in Nitrate Vulnerability Zones.

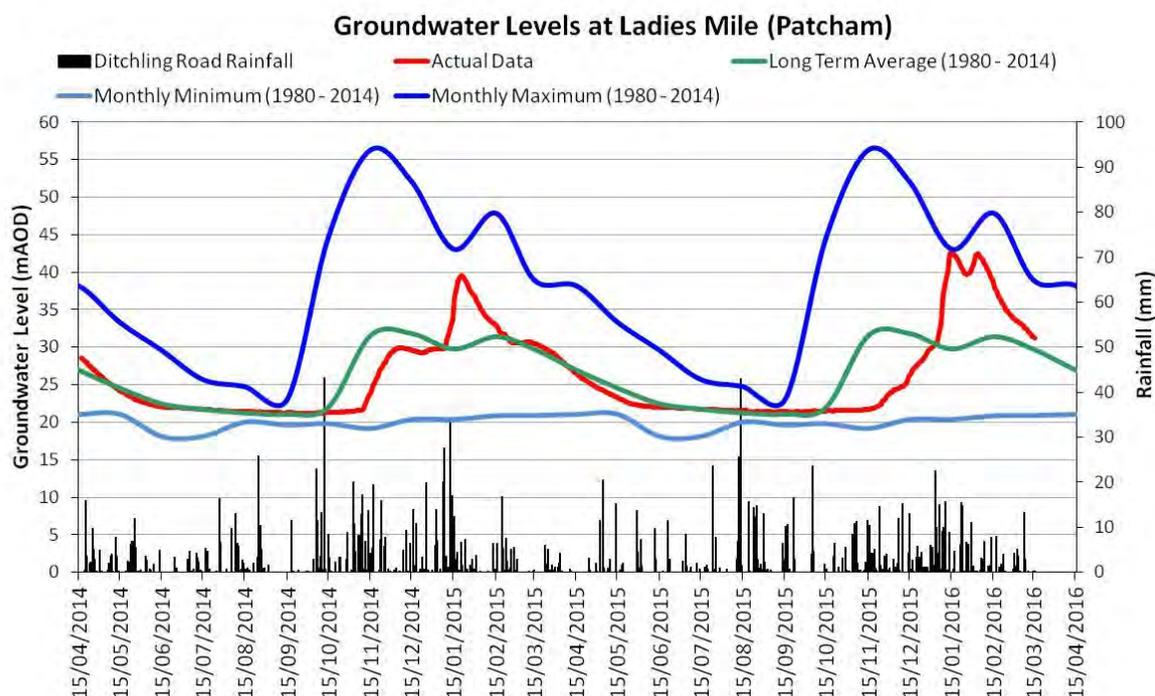
Groundwater Quantity

3.23.6 The amount of water aquifers receive (recharge) varies throughout the year. Recharge rates and water levels are lowest in the summer and early autumn, when there is less rain and higher temperatures. In these conditions more water is evaporated at the surface and plants take more water from the ground, so less is available for recharge. Recharge rates are highest in the winter and groundwater levels reach a peak in early spring. Changes in groundwater levels lag behind rainfall, and this allows springs and rivers to continue to be fed by groundwater over the summer, which in turn causes the groundwater level to fall. Failure of winter rainfall over one or more years can lead to shortages in groundwater. When groundwater levels are too high groundwater flooding occurs, which has occurred in recent years in certain areas of the city.

3.23.7 The following illustration shows the fluctuations in groundwater levels at the Ladies Mile borehole between April 2014-April 2016. Current levels (March 2016) are slightly higher than the average, but within minimum and maximum levels. The peaks in January and February are reflective of higher than average rainfall during this period.

¹⁴ [Environment Agency Groundwater Source Protection Zone Maps](#)

Figure 3: Groundwater Levels at Ladies Mile 2014-2016 ¹⁵



Sea water

3.23.8 The quality of our seawater is of equal importance in terms of environmental quality, enabling it to support varied and mixed ecosystems, and also due to its value as a recreational asset. The quality of the seawater around Brighton & Hove is monitored at four locations between May and September each year and is based on the amount of bacterial colonies per 100ml of water found over the monitoring period. The table below shows the water quality since 2010. The long term trend is that seawater has improved, with recent years meeting the good or excellent quality.

Table 6: Seawater quality 2010-2015 ¹⁶

Beach	2010	2011	2012	2013	2014	2015
Brighton Kempdown	Good	Sufficient	Good	Good	Excellent	Excellent
Brighton Central	Excellent	Good	Good	Good	Excellent	Excellent
Hove First Avenue	Excellent	Good	Good	Excellent	Excellent	Excellent
Saltdean	Unknown	Excellent	Excellent	Good	Excellent	Excellent

3.23.9 Seawater quality can be affected by periods of heavy rainfall. A storm overflow operates during heavy rainfall when the sewerage system becomes

¹⁵ [Groundwater Situation, Sussex, March 2016 \(Environment Agency\)](#)

¹⁶ [Source: Environment Agency](#)

overwhelmed by the amount of surface water. The overflow prevents sewage from backing up pipes and flooding properties and gardens.

Sewage and wastewater discharge

3.23.10 Sewage from Brighton & Hove, Telscombe and Peacehaven is treated at the Peacehaven Wastewater treatment plant. Once it is treated it is discharged into the sea 2.5km offshore at Friars Bay, meeting regulations on chemical oxygen demand and biochemical oxygen demand. Sludge is treated to generate agricultural fertiliser. This plant opened in 2013. Prior to this, wastewater was discharged into the sea having had only basic treatment.

Water consumption – supply/demand balance

3.23.11 The city’s water is supplied by Southern Water. The 2010-2035 Management Plan produced by Southern Water indicated that the area was in water deficit, meaning that there was not enough water to meet demand. Information from the 2015-2040 Management Plan shows that the deficit has been reduced and that supply now exceeds demand. However it recognises that the south east is at risk of drought due to nature of water supply, and includes measures and actions that will be taken to restrict water usage during drought periods.

3.23.12 Household water use is measured as per capita consumption which is the amount of household water used per person per day. The table below shows how average water consumption locally is showing a downward trend. This could be a result of measures such as universal metering which has been implemented by Southern Water throughout the city where possible, as well as implementation of water efficiency standards in newer developments. 44% of households across the Southern Water region now have a water meter.¹⁷

Table 7: Household water consumption

	2005/2006	2009/10	2012/2013	
Brighton & Hove Litres/person/day	157	150	Metered 132	Un-metered 161

3.24 LIKELY FUTURE BASELINE

Water Quality Status

3.24.1 Sea water is likely to remain of a good or excellent standard due to recent improvements in infrastructure that treats wastewater.

3.24.2 Groundwater chemical quality is likely to improve, with measures in place such as the Nitrate Protection Zone and Source Protection Zone. Southern Water Management Plan also includes measures to remove nitrates further.

¹⁷ [Southern Water Management Plan 2015-2040](#)

3.24.3 There are targets and actions set out in the Southern Water Management Plan that should help to reduce demand and increase supply, therefore having potential to reduce the amount of water abstracted from the groundwater resource and improve the “quantity” status. However, increases in population will increase demand further, and impacts from climate change, such as higher temperatures and lower rainfalls will impact on recharge, thus impacting on quantity available and overall status.

Water Supply

3.24.4 The Southern Water Management Plan sets targets to be achieved by 2040 which include:

- Reduction in non-household demand for water
- Reduction in mains leakage
- Overall increase in supply of an addition 71million litres compared to 2015 levels

3.24.5 Ways of increasing supply in the central area includes:

- Schemes to reduce leaks
- Nitrate removal plants
- Water efficiency schemes for households, business and schools
- Increasing efficiency of wells
- Development of new pipelines to transport water between water areas

3.24.6 Climate change poses a serious risk to water supply, as described above, as this could result in reductions in rainfall, as well as higher temperatures, both of which will impact on recharge and the amount of water available.

Water Demand

3.24.7 There are various targets in place that could result in individual (residential) decreases in demand for water.

- Southern Water has a target to reduce average water consumption to 133l/person/day by 2020 (metered).
- 90% of Southern Water residential customers to have a water meter by 2040.
- The City Plan Part 1 sets a requirement for all new residential development to achieve 110 litres/person/day.

3.24.8 Implementation of actions to meet these requirements and targets should help to minimise household water demand from new and existing residential development, however as City Plan Part 1 also sets a target to deliver 13,200 new homes this will create an increase in demand for water overall.

3.25 SUSTAINABILITY ISSUES

3.25.1 The key sustainability issues identified from the context and baseline review are:

- Groundwater relies of recharge from rainwater. Lower than average periods of rainfall can result in short-term drought conditions due to the city's reliance on groundwater as its principal source of water.
- Future climate change related impacts, such as higher average temperatures and lower rainfalls will have an impact on groundwater recharge.
- Groundwater is susceptible to pollution and is currently classified as having poor chemical quality. Source Protection Zones cover large extents of the city. Measures to prevent pollution within these zones, including for example sustainable drainage and green infrastructure, as well as measures to reduce disturbance of contaminants during construction, must be implemented to ensure improvement and protection of the groundwater resource.
- The groundwater resource is already under pressure and is classified as having poor quantity status due to abstraction rates. Any increases in population levels will result in an increase in demand for water in an already water-stressed area. Measures to reduce demand for water must be implemented.
- Severe weather events, such as prolonged heavy rainfall, have the potential to result in groundwater flooding and then surface water flooding. In addition, heavy rainfall can overwhelm the sewerage system and result in further surface water flooding. Both cause a risk of pollution to water resources, both groundwater and seawater. Measures to reduce surface water flood risk are important to maintain water quality.

3.26 DATA LIMITATIONS

3.26.1 There is little data available on water consumption from non-residential uses.

3.27 SUSTAINABILITY APPRASIAL OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.27.1 The following SA Objective and DMC are proposed to assess emerging policy options. Flood risk is also strongly linked to this objective however this has been put under the objective that is specific to flood risk instead.

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To improve water quality (ecological, chemical and quantity status)	<ul style="list-style-type: none"> • Encourage remediation of despoiled, degraded or contaminated land • Ensure remediation of land does not result in contamination of water resources • Encourage sustainable drainage solutions including green infrastructure • Reduce the risk of surface water run-off • Encourage sustainable use of water • Reduce water consumption • Maximise re-use of waste-water • Conserve and maintain water resources

Sites

3.27.2 The following SA Objective and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1,2, or 3 of a Groundwater Source Protection Zones.
	+	Part of site within zone 3 but not zone 1 or 2 of Groundwater Source Protection Zone.
	0	
	-	All of site within zone 3, and part of site within zone 2 of a Groundwater Source Protection Zone.
	--	Entire site located either within a zone 1 or 2 of a Groundwater Source Protection Zone.

3.3 Topic 3: Soil, Waste and Land Resources

3.31 INTRODUCTION

3.31.1 Soil plays a vital role in ecosystem services and has various functions that are important for agriculture, the environment and for nature protection. Functions include provision for plants, filtering of rainwater, regulation of rainwater and flood prevention, carbon storage as well as provision of construction and manufacturing materials.

3.31.2 Land as a resource is a key component of sustainable development. The competing needs of urban development, agriculture, biodiversity and the provision of open space must all be balanced with each other to ensure that local needs can be met, as well as maintaining the protection of the underlying soils.

3.31.3 Brighton & Hove is heavily constrained, with the sea to the south and the South Downs National Park surrounding the vast majority of the city. It is essential to make the best use of the land available in order to meet the city's various needs.

3.31.4 Waste is generated from a variety of sources. There is a need to manage waste more sustainably in line with the waste hierarchy (prevent, reuse, recycle, recover, dispose) and to view waste as a resource, rather than something that requires disposal.

3.31.5 This topic chapter sets out the baseline and context information relating to soil, waste and land resources. Details on contamination will also be looked at within this chapter. The chapter also sets out the policy context, and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.32 CONTEXT REVIEW

3.32.1 Key documents reviewed:

- EU Waste Directive (2008)
- EU Strategy for Soil Protection (2006)
- NPPF (2012)
- Safeguarding our Soils (2009)
- Government Review of Waste Policy (2011)
- Waste Management Plan for England (2013)
- BH Waste Strategy (2010)
- East Sussex, South Downs and Brighton & Hove Waste & Minerals Plan (2013)
- City Sustainability Action Plan (2015)
- Sustainable Community Strategy (2014)

- BH Contaminated Land Strategy (2005)

3.32.2 The key sustainability objectives and messages coming from the context review are to:

- Protect and enhance soils
- Value soils in urban areas for the ecosystem services they provide
- Encourage the effective use of land through the reuse of land which has been previously developed
- Promote the remediation of contaminated sites
- Prevent the creation of newly contaminated sites
- Reduce the amount of waste created
- Increase the proportion of waste that is recycled
- Ensure that waste is recovered or disposed of without using processes or methods which could harm human health and the environment

3.33 CURRENT BASELINE

Agricultural Land Classification

3.33.1 Agricultural Land Classification is a method for assessing the quality of farmland. Land is classified from grade 1 to grade 5 with grades 1, 2 and 3 being the best quality. The vast majority of Brighton & Hove which falls within the Brighton & Hove LPA is classified as non-agricultural land as either: “Other land, predominantly in non-agricultural use”, or “Land predominantly in an urban use”. The majority of land that is in agricultural use falls within the South Downs National Park and is classified as being of grade 2 or 3. There are some areas within the Brighton & Hove LPA area that are classified as agricultural land, including the area to the north of Mile Oak and the Toads Hole Valley site, although this does not necessarily mean they are currently in productive agricultural use.¹⁸

Environmental Stewardship Schemes

3.33.2 The way that land is managed can affect the quality of the soil and the amount of diffuse pollution (runoff from the land) that runs into watercourses. The Environmental Stewardship scheme is an incentive scheme that helps farmers and other land-managers to achieve environmental improvements on their land including improved soil and water quality, improved wildlife and improved landscape. The schemes are as follows: entry level, higher level, organic entry level and organic higher level. In 2015, over 3,000 hectares of land was under an environmental stewardship scheme in Brighton & Hove. This included land falling within Brighton & Hove that is both within and outside the SDNP.¹⁹ To put this into context the area within the Brighton & Hove administrative boundary, including that within the SDNP, is approximately 8,267 hectares therefore covering 36% of the land area.

¹⁸ [Magic Map \(Defra\)](#)

¹⁹ [AMR 2014/2015](#)

Nitrate Vulnerability

3.33.3 Nitrate Vulnerable Zones are where land drains into nitrate polluted waters, or where waters could become polluted by nitrates. The entire city is in a nitrate vulnerable zone due to the vulnerability of the Brighton Chalk Aquifer to nitrate pollution. The use of nitrogen fertilisers and organic manures is restricted in Nitrate Vulnerable Zones to reduce the risk of pollution of the groundwater resource but also benefits soil quality.

Land Use

3.33.4 The City of Brighton and Hove lies between the South Downs and the sea and this results in a constrained and compact city. Brighton & Hove covers 8,267 hectares. Over 40% of the city is within the South Downs National Park. The predominant land uses in Brighton & Hove are residential, followed by agricultural, with agricultural land mainly falling within the SDNP.

Contaminated land

3.33.5 The council has a statutory duty to produce a strategy to deal with contaminated land and to ensure that any contaminated land identified is remediated. The council holds information on area of land that are contaminated due to submissions through the Planning Application process, and has also undertaken a desk-top study of historical uses to ascertain whether areas of land have potential for contamination due to a current or previous use. Over 2,800 sites have been identified as having potential for contamination or being contaminated. A Public Register of contaminated sites is available for inspection.²⁰

Previously Developed Land

3.33.6 Previously Developed Land (PDL) is defined as land which is or was occupied by a permanent structure, including the curtilage of the land. Land within built up areas such as privately owned gardens, parks and allotments are not included within the definition of PDL. Housing and employment development on PDL has remained fairly stable over recent years as shown in the following table, with the majority of development in the city being on land that was previously developed. It is understood that 87% of the city's housing target will come forward on Previously Developed Land.

Table 8: Proportion of development on PDL 2010-2015 ²¹

	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015
% of new or converted dwellings on PDL	99%	89%	95%	97%	91%
% of new land in employment uses on PDL	80%	100%	100%	99%	100%

Greenfield land

3.33.7 Greenfield land is defined as undeveloped land in a city or rural area. Greenfield land can be in agricultural uses for example, and also includes

²⁰ [BH Contaminated Land team](#)

²¹ [AMR 2014/15](#)

land within urban areas that forms allotments, parks & gardens used for public recreation, as well as privately owned gardens. The vast majority of the city's greenfield land is agricultural land located within the SDNP, however also includes the city's parks and open spaces located within the built up area. There are also 64 greenfield sites located within the city's urban fringe (the area between the built up area boundary and the SDNP). Some of these have been identified as having potential for residential development and form part of the city's housing target.

Density

3.33.8 Brighton & Hove is a densely populated city. Gross density, measured by dwellings per hectare varies enormously across the city and is influenced by the type of dwelling, the proximity to other dwellings, width of the streets, provision and size of private gardens and the mix of tenure types. Not including the central Conservation Areas, areas within West and Central Hove, and areas within Hanover and Queens Park have the highest gross housing densities in the city. These areas both contain 19th century housing, which are a highly efficient use of land achieving net densities of around 200 dwellings per hectare.²²

Waste

3.33.9 Brighton & Hove City Council, as a Waste Planning Authority, is responsible for preparing planning policies for waste management. Current policies are contained in the joint East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (WMP), adopted in 2013. The adopted WMP sets out the strategic policy framework for waste and minerals development in the Plan Area, but does not include site specific allocations. The three authorities have now submitted the Waste & Minerals Sites Plan which provides this detail by identifying locations where future waste infrastructure could be developed. Together the two documents will form the complete Waste and Minerals Local Plan.

3.33.10 The WMP includes ambitious targets for diverting 98% of all waste streams from landfill by 2020/21, and to enable East Sussex and Brighton & Hove to be net self-sufficient in waste management capacity.

Sources of Waste Arisings²³

Local Authority Collected Waste

3.33.11 LACW is comprised of around 95% household waste, with the remainder coming from sources such as street sweepings and public parks. LACW accounts for approximately 21% of the total amount of waste produced in East Sussex and Brighton & Hove. The total amount of LACW arising in Brighton & Hove has fluctuated over recent years, but is not showing a downward trend. The amount of waste being either reused, recycled, composted has changed little over recent years, totalling 27% for 2014/2015. This is well below the target set by the national Waste Strategy for 50% of

²² [BH Urban Characterisation Study 2009](#)

²³ All waste data from East Sussex Annual Monitoring Report 2014/2015

LACW to be recycled/reused by 2020 and below the England average of 43%.

3.33.12 The amount of LACW arising in Brighton & Hove that is disposed of through landfill has decreased significantly to approximately 4% over recent years, following the development of a network of modern waste recycling and recovery facilities.

Table 9: LACW arisings and waste management methods

	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015
Total LACW (tonnes)	106,897	103,771	104,418	103,653	107,182
% recycled	23%	23%	22%	22%	21%
% reused	1%	2%	3%	3%	3%
% composted	3%	4%	4%	3%	3%
% recovered (energy)	39%	50%	66%	65%	69%
% landfilled	33%	22%	5%	7%	4%

Commercial & Industrial Waste

3.33.13 C&I waste is produced from shops, food outlets, businesses and manufacturing activities and accounts for approximately 27% of total waste produced in East Sussex and Brighton & Hove. It is difficult to obtain accurate data for C&I waste, however it is estimated that 462,189 tonnes were produced in 2014. The most reliable estimate of C&I Waste management methods in 2008/09 were: 67% material recycled and composted; 29% disposed to land; and 4% reused²⁴.

Table 10: Estimates of C&I waste arisings

	2010	2011	2012	2013	2014
Tonnes	341,898	412,201	426,825	422,353	462,189

Construction, Demolition & Excavation Waste

3.33.14 CDEW is produced from building activity and is estimated to account for approximately 51% of the total waste in East Sussex and Brighton & Hove. It is difficult to obtain accurate data for CDEW however it is estimated that CDEW arisings in 2008/09 were 906,000 tonnes. The most reliable estimate of CDEW management methods in 2008/09 were: 45% of all material being recycled; 15% being sent to landfill and the remainder (40%) being disposed of using alternative methods. Alternative methods include management of waste outside the recorded system such as reuse on site.

²⁴ AEA Review of Future Waste Management Capacity Requirements -East Sussex and Brighton & Hove (2011)

3.34 LIKELY FUTURE BASELINE

- 3.34.1 Changes in government funding mean there is less money available for councils to remediate contaminated land. This is likely to affect the amount of contaminated land being successfully remediated in the future.
- 3.34.2 The proportion of housing development situated within Previously Developed Land is likely to decrease in the long-term, as development on the city's greenfield urban fringe sites comes forward. The average densities of housing delivered are likely to increase, in order to meet the City Plan Part One housing target and to make use of limited site availability.
- 3.34.3 The total amount of LACW may grow reflecting an increased population and number of households. The proportion of commercial sources of waste which is recycled or recovered is likely to increase as landfill availability decreases and new facilities are brought forward. The Waste and Minerals Sites Plan identifies a number of locations in the city and East Sussex which are suitable in principle for new waste management infrastructure.

3.35 SUSTAINABILITY ISSUES

3.35.1 The key sustainability issues identified from the context and baseline review are:

- Sensitive management of agricultural and non-agricultural land is imperative to ensure the continued improvement in soil quality, which is also required to improve the quality of the groundwater resource
- There is a legacy of contaminated sites located throughout the city. These will require remediation in order to ensure sensitive receptors, including people, animals, plants and the natural environment, are not unduly harmed.
- Development can disturb contaminants which would otherwise have laid dormant, leading to leaching or other dispersal of pollutants.
- The availability of land, both previously developed and greenfield, is limited in the city. There is a need to ensure that future development makes the most efficient use of land available.
- The total amount of LACW arisings and the amount of waste produced per household have both increased in recent years. There is a need to ensure that the amount of waste produced is reduced
- The proportion of household waste being recycled is significantly below the England average and below national targets. There is a need to increase opportunities that facilitate reuse and recycling.

3.36 DATA LIMITATIONS

3.36.1 Accurate and up to date data on both Commercial & Industrial Waste and Construction & Demolition Waste are difficult to obtain. This is a recognised issue nationwide.

3.37 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.37.1 The following SA Objectives and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To improve soil quality.	<ul style="list-style-type: none"> • Promote sensitive management of land in open space or agricultural uses • Encourage remediation of despoiled, degraded or contaminated land • Ensure development is delivered in a way that does not result in further dispersal of contaminants • Encourage sustainable drainage solutions
To make the best use of land available.	<ul style="list-style-type: none"> • Regenerate derelict areas and areas of previously developed land • Help to reduce the number of vacant buildings through adaptive re-use • Maximise the efficient use of land by high density development in suitable locations • Maximise the efficient use of land e.g. through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings. • Promotes retention of ecosystem services on Greenfield sites with development potential
To minimise and sustainably manage waste.	<ul style="list-style-type: none"> • Promote waste reduction, re-use, recycling and recovery in line with the waste hierarchy • Facilitate improved accessibility to recycling and other waste management facilities • Promote building design that is resource efficient and minimises construction waste • Promote the use of secondary and recycled materials including the re-use of existing materials and buildings.

Sites

3.37.2 The following SA Objectives and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To improve soil quality	++	Site currently significantly contaminated, offering potential to improve.
	+	Site has potential for contamination (based on former uses), and offers potential to improve.
	0	Site not currently contaminated.
	-	Site currently contaminated with limited potential to remediate; and/or part of site contains grade 3 or higher agricultural land.
	--	Site currently contaminated with limited potential to remediate; and/or all of site contains grade 3 or higher agricultural land.
To make the best use of land available.	++	Site offers potential to regenerate derelict PDL; site capable of delivering high density buildings; site offers potential for multi-functional design/uses.
	+	PDL site - redevelopment will help to facilitate adaptive re-use of existing buildings. Site capable of delivering minimum density targets set by City Plan Part 1. Or, site is greenfield and will allow for the incorporation/retention of some existing ecosystem services.
	0	
	-	Site is PDL but is unlikely to be capable of meeting minimum density targets in City Plan Part 1.
	--	Site is greenfield, but offers no potential to retain any greenfield functions (ecosystem services).
	To minimise and sustainably manage waste	++
+		Site will facilitate adaptive re-use of existing buildings and therefore preserve resources. Site will encourage recycling/re-use of materials.
0		
-		Some potential to use make use of some existing buildings or resources on site. Likely to involve some use of natural resources. Some potential uses on the site may conflict with future plans for waste management in the vicinity.
--		No potential to make use of any of the existing buildings or resources on site. All potential uses on the site may conflict will future plans for waste management in the vicinity.

3.4 Topic 4: Air Quality and Transportation

3.41 INTRODUCTION

- 3.41.1 The main cause of poor air quality in Brighton & Hove is vehicular traffic. Numerous pollutants are emitted from vehicle exhausts and the main contributor to poor air quality locally is Nitrogen Dioxide. Small particles are also among the pollutants emitted from vehicle exhausts and can pose a serious health issue.
- 3.41.2 When air pollution is present in high concentrations it can cause various health effects ranging from irritation of the eyes, nose and throat to the worsening of lung and heart diseases. It can particularly affect young people, old people and people who have existing respiratory conditions such as asthma and bronchitis. In addition to impacts on human health, high levels of air pollutants could impact on vegetation and sensitive habitats and ecosystems.
- 3.41.3 The way people travel varies according to a number of factors such as age, health and financial situation. People need transport to access basic activities such as work, education, health and food, as well as for leisure. Good local transport is required to ensure that residents' needs can be met and a balance between competing modes of transport must be sought. Transport is one of the major contributors to the city's carbon emissions.
- 3.41.4 Other forms of combustion can also affect air quality, such as electricity supply industry, and other commercial and industrial processes.
- 3.41.5 This topic chapter sets out the baseline and context information relating to air quality and transport. The chapter also sets out the sustainability issues and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.
- 3.41.6 Maps to support this section can be found in Appendix D.

3.42 CONTEXT REVIEW

- 3.42.1 Key documents reviewed:
- EU Air Quality Directive
 - EU Noise Directive and associated Regulations
 - Towards a competitive and resource efficient transport system (EC, 2011)
 - The Environment Act 1995 Part IV
 - Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)

- Air Pollution: Action in a Changing Climate (Defra, 2010)
- NPPF (2012)
- Transport White Paper: Creating Growth, Cutting Carbon – Making Sustainable Transport Happen (2011)
- Low Carbon Transport: A Greener Future – A Carbon Reduction Strategy for Transport (2009)
- Active Travel Strategy Department for Transport Feb-(2010)
- Door to Door: A Strategy for improving sustainable transport integration (2013)
- BH Air Quality Action Plan (2015)
- City Sustainability Action Plan (2015)
- Sustainable Community Strategy (2014)
- BH Local Transport Plan 4 (2015-2019)

3.42.2 The key sustainability objectives and messages coming from the context review are to:

- To maintain ambient air quality where it is good
- To improve ambient air quality where pollutants exceeds air quality objectives
- Avoid, prevent or reduce harmful effects of air and noise pollution on human health and the environment
- Make sure that everyone can enjoy a level of ambient air quality in public spaces, which poses no significant risk to health or quality of life
- New development in Air Quality Management Areas should be consistent with the Local Air Quality Action Plan
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or adversely affected by unacceptable levels of air pollution
- Promote accessibility to jobs, education, health, shopping, leisure facilities and services by public transport, walking and cycling and reduce the need to travel, especially by car.
- Reduce transport based greenhouse gas emissions.
- Secure a shift towards the use of more sustainable modes of transport
- Promote and enable greater use of zero- and low-emission forms of transport.
- Promote actions to reduce exposure to noise

3.43 CURRENT BASELINE

Air Quality

Air Quality Review and Assessment

3.43.1 Air quality assessments have been undertaken and published by the council since 1999 as part of the duty under Part IV of the Environment Act 1995. The assessments are informed by monitoring which takes place at various locations throughout the city. These cover the following air pollutants: Nitrogen Dioxide (NO₂), Particulate Matter (PM₁₀ and PM_{2.5}), Sulphur Dioxide (SO₂), Benzene, Polycyclic Aromatic Hydrocarbons (PAH), and Ground Level Ozone (O₃).

3.43.2 Ongoing monitoring shows compliance with nationally set Air Quality Objectives for all pollutants with the exception of Nitrogen Dioxide, for which an Air Quality Management Area has been declared since 2004.

Air Quality Management Area

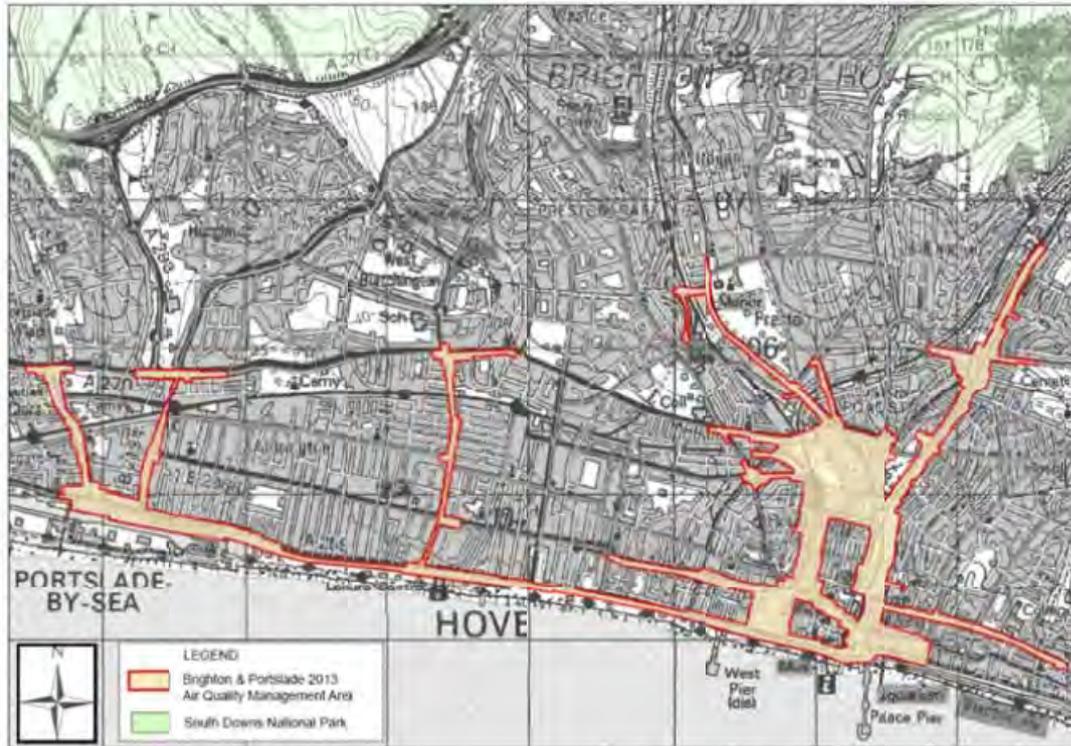
3.43.3 The Air Quality Objective requires that the annual mean target of 40 µg/m³ of NO₂ is achieved, and that there are no more than 18 times a year when the annual mean exceeds 200 µg/m³. Nitrogen Dioxide monitoring undertaken first showed an exceedence of the annual mean Air Quality Objective at certain locations in 2003 and subsequently an AQMA was declared in 2004. This mainly covered parts of Lewes Road, London Road and North Street.

3.43.4 Following this, a third round of assessment in 2006 led to an enlarged AQMA being declared in 2008. This included the area covered by the AQMA 2004 but also included other areas of the city, including most of the city between Old Shoreham Road down to the seafront, from Portslade to Brighton, and similarly, the area from Edward Street/Eastern Road down to Madeira Drive. The total extent of the AQMA 2008 was 1050 hectares.

3.43.5 Sustained improvements in nitrogen dioxide concentrations justified revocation of a substantial part of the 2008 AQMA (800 hectares) in 2013. At the same time two smaller areas were declared that had not previously been included within the AQMA. This included Rottingdean village High Street and the Preston Road/Preston Drove area. The extent of the AQMA 2013 can be seen in the following two figures.

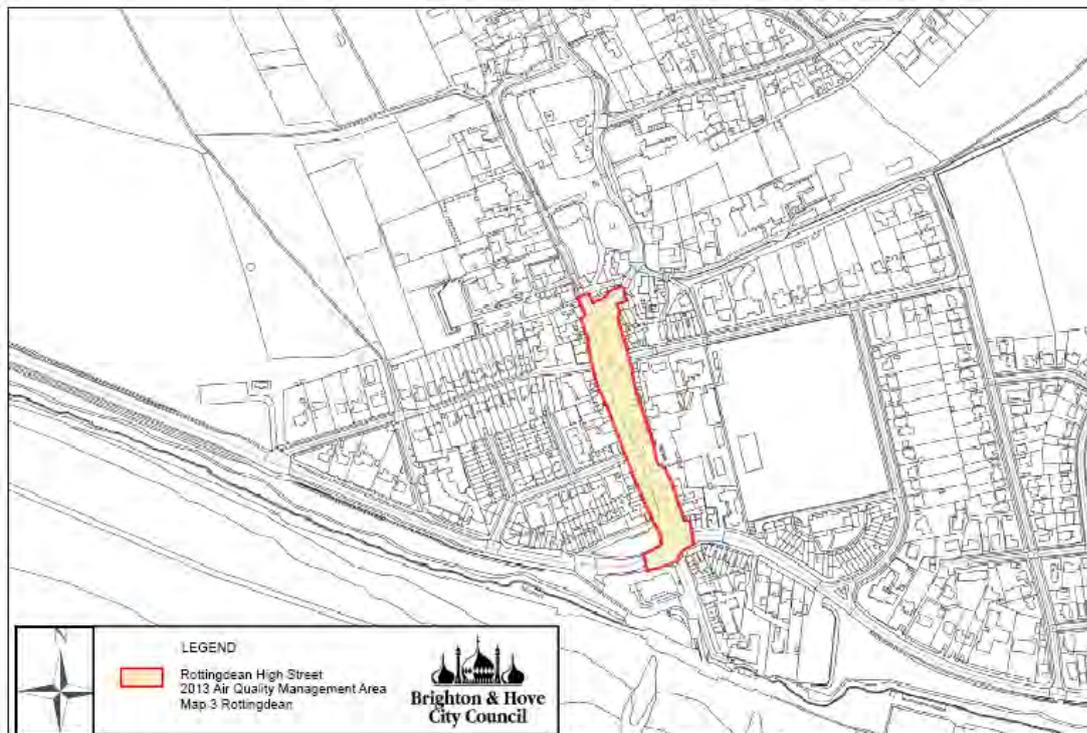
Figure 4: Brighton, Hove and Portslade AQMA 2013

(images taken from Air Quality Action Plan 2015)



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Figure 5: Rottingdean AQMA 2013



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Air Quality Monitoring

Nitrogen Dioxide

3.43.6 There is a network of monitors that record levels of Nitrogen Dioxide as well as other pollutants across the city. This includes three automatic analysers that record levels every 15 minutes, as well as diffusion tubes that monitor daily levels. There are currently 65 monitoring locations across the city. In 2015, 32 of these exceeded the annual air quality objective. For comparison purposes, in 2014 41 locations exceeded the air quality objective and in 2013 43 locations exceeded the objective. However, it should be noted that in order to make use of the monitoring resources, locations of monitoring stations are often moved to locations where poor air quality is an issue. Therefore a comparison which is based purely on the number of locations which do or do not comply with the air quality objective does not provide an accurate picture of whether air quality is improving or not.

3.43.7 A more accurate way of assessing whether air quality is improving is by assessing trends at each individual monitoring station. For illustration purposes, the following table shows the diffusion tube results from the ten monitoring locations with the highest exceedence above the air quality objective across the city for which there are more than one year's results. As can be seen from the locations, these are mainly located within the central areas of the city. Also included are the results for the Trafalgar Street, Portslade, and for Rottingdean High Street, and also park locations which are set back from the road and are for background comparison purposes

Table 11: Selection of diffusion tube results 2010/11- 2014/15 ²⁵

Monitoring Location	2010/2011 µg/m3	2011/2012 µg/m3	2012/2013 µg/m3	2013/2014 µg/m3	2014/2015 µg/m3
North Street East of Clock Tower		114.3	114.8	121.5	91.9
Cheapside nr London Road		62.9	56.9	64.2	61.3
Oxford Street near London Road	65.4	65.0	68.6	62.1	60.2
North Street Middle	79.0	83.0	84.6	68.3	59.8
Lewes Road Elm Grove Junction		67.4	65.8	60.0	54.9
Viaduct Terrace nr Ditchling Road	70.9	62.4	57.9	62.7	54.6
Grand Parade nr Edward St (A23)	51.4	51.7	44.8	52.3	51.0
Castle Square east of East Street	65.9	53.1	58.1	59.0	50.1
Marlborough Place (A23)	61.5	57.6	60.2	58.7	47.3
North Street next to Ship Street		61.6	65.5	53.6	47.1
Trafalgar Road Lamp, Portslade		49.3	49.9	46.4	41.5
High Street Rottingdean (west side)	48.4	46.2	47.0	41.3	37.7
Pavilion Gardens Background		25.4	26.1	22.6	22.5
Vale Park, Portslade, Background	24.1	22.8	23.0	20.1	21.0

3.43.8 Analysis of results at some individual monitoring locations suggests an improvement in recent years. Nitrogen Dioxide levels in the most polluted areas have declined in the past three years as follows (monitoring location in brackets)²⁶:

- North Street/Western Road (near Ship Street) 21% reduction since 2012
- Queen's Road/Terminus Road (Terminus Road) 20% reduction since 2012
- New England Road (West of Preston Circus) 15% reduction since 2012
- Lewes Road (South of the Vogue Gyratory) 14% reduction since 2012

²⁵ [Diffusion Tube Results 2015](#)

²⁶ BHCC Environmental Health team

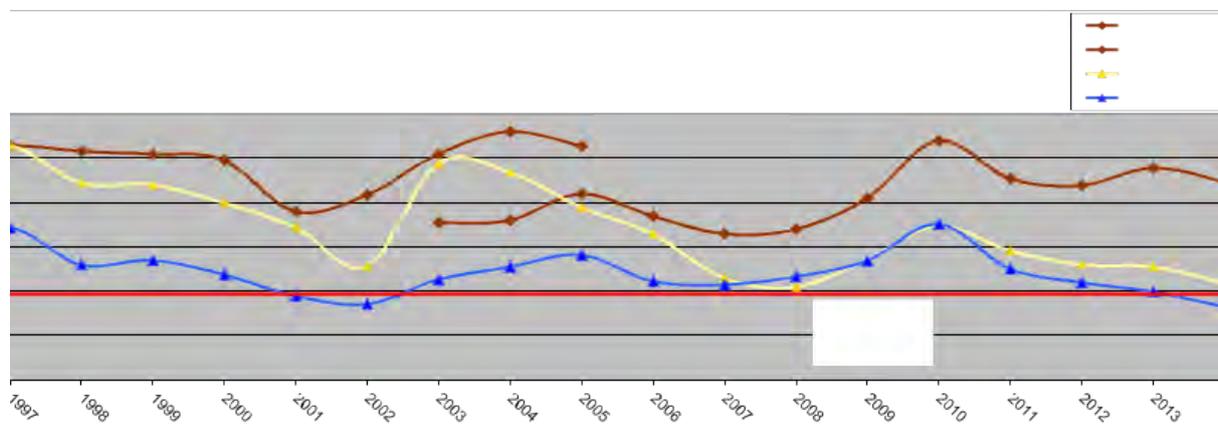
- London Road/Valley Gardens, (Cheapside Junction) 3% reduction since 2012

However, despite an improvement, levels of NO₂ still breach UK and EU legal limits at many monitoring locations within the AQMA

Long term trends of Nitrogen Dioxide

3.43.9 The following illustration shows the levels of NO₂ at three monitoring locations over a 16 year period; Lewes Road (brown), Grand Parade (yellow) and St James's Street (blue). The red line shows the annual mean objective of 40 µg/m³.

Figure 6: Nitrogen Dioxide levels at three locations 1997-2013 ²⁷



3.43.10 Long term analysis at these locations seems to indicate a trend of improvement. However, levels still breach the air quality objective at some of these locations.

3.43.11 Monitoring at some city centre roadside sites in the AQMA suggests that current nitrogen dioxide concentrations are similar to 2002 levels with improvements since 2010. At a number of roadside locations nitrogen dioxide concentrations have not changed on those recorded fourteen years ago. Concentrations continue to be recorded above the nitrogen dioxide legal limit within nine metres (30 feet) of confined roads in parts of Brighton and Portslade. Recent monitoring suggests compliance with the limit in Rottingdean but this needs to be confirmed with 2016 and 2017 monitoring results.²⁸

²⁷ [BHCC Environmental Health team](#)

²⁸ [BHCC Air Quality Management in the City](#)

3.43.12 Outside the AMQA, continuous analysis of outdoor air shows a long term in nitrogen dioxide. Improvements are recorded in lower density areas, outer locations and suburban neighbourhoods where prevailing air quality is good. In combination with source reductions in lead, benzene and carbon monoxide, it is likely that where many people live, the air inhaled is more healthy than 10-20 years ago.²⁹

Particulates

3.43.13 Particulates are fine airborne particles, which when inhaled can penetrate deep into the lungs and pose a serious health risk. Fine particles in the air can travel long distances between regions. Particulates are monitored at 4 locations across the city at Preston Park, Lewes Road, Beaconsfield Road and North Street. The Preston Park station is part of DEFRA's National Network.

3.43.14 Results from the Beaconsfield Road monitoring location, indicated that the annual mean target of 40 µg/m³ for PM₁₀ was met in 2012, achieving an annual mean 28 µg/m³. There were fifteen days (24-hour average) that had concentrations of more than 50 µg/m³ compared to a target of 35. In 2013 concentrations of PM₁₀ on North Street were monitored as 26 µg/m³. Three days (24-hour average) had concentrations of more than 50 µg/m³.³⁰

3.43.15 Trends suggest that the city continues to meet the air quality objective for PM₁₀.

3.43.16 From 2014/15 levels of particulate matter of less than 2.5 microns (PM_{2.5}) has also been monitored at the North Street and Lewes Road Continuous Analysers. This will be reported in 2016.

Sources of pollution

3.43.17 Poor air quality in Brighton is dominated by near ground level emissions and local transport sources. Due to economy and transport policies some local road counters show a decline in total traffic tallies between 2008 and 2012, however levels of nitrogen dioxide have not improved in some places near roads, which can be attributed to following contributory factors:

- A higher proportion of diesel vehicles that show no performance improvement in emissions of nitrogen dioxide
- Diesel particulate filters that can become clogged with soot following repetitive urban driving
- Exhaust traps designed to mitigate particles that can produce and emit additional nitrogen dioxide from the tail pipe
- Older petrol vehicles with catalytic converters that perform less well with time

²⁹ [BHCC Air Quality Management in the City](#)

³⁰ [BHCC Air Quality Management in the City](#)

- Internal combustion engine and emission abatement technologies that are not suited to; stop-start mileage, congested intersections, intermittent acceleration and sharp hill climbs
- Narrow street ways that are less favourable for dispersion of emissions
- Eddie and wake effects sometimes resulting in slower flow of wind one or two city blocks inland from the sea front
- A seasonal pattern in ambient nitrogen dioxide points to a lack of vertical dispersion above the street in the wintertime
- A recorded decline in regional background pollutant levels emphasis the importance of local road traffic emissions

Bus Low Emission Zone

3.43.18 A bus Low Emission Zone has been designated which covers the North Street, Churchill Square and Western Road corridor. This area covers some of the roadside locations which have the highest levels of NO₂ where buses are the most prevalent form of transport. Bus companies operating in the city are gradually upgrading their fleets with less-polluting vehicles. Brighton & Hove Buses will soon have phased out all of its old Euro 3 emission standard vehicles. Just over a year ago it was running around 100 of these. Meanwhile it is spending millions on the highest-standard Euro 6 buses and converting other vehicles to lower-emission technology.

3.43.19 Funding from the clean bus transport fund has been secured for the last three years which has enabled the retrofitting of some of the bus fleet to be carried out, for example.

3.43.20 The Low Emission Zone should be of particular benefit within the designated area, however the benefit of having cleaner buses will also be experienced across the city.

Noise

3.43.21 Prolonged exposure to noise can have a detrimental impact on health and quality of life. The World Health Organisation recommends that a night-time level of noise of no more than 40 decibels is required to ensure good quality sleep (measured from inside the dwelling).³¹ It also recommends that anything above 55 decibels during the day would present a community annoyance.

3.43.22 Brighton & Hove was mapped for noise in 2007 under the Environmental Noise Directive and associated Regulations.³² Noise from road, rail, air traffic and industry was estimated, based on traffic flows and likely vehicle types, during the day and during the night. It also took into account buildings and topographical features that could affect noise dispersal. The results from

³¹ [Night Noise Guidelines for Europe \(WHO 2009\)](#)

³² <http://services.defra.gov.uk/wps/portal/noise>

the exercise show that many major junctions and roads in Brighton & Hove had levels of traffic noise in excess of 55 decibels during the day and some also at night.

3.43.23 A Noise Action Plan was produced in 2010 informed by the mapping exercise, which sets out possible actions for addressing road, and other sources of noise.³³ It identified “important areas” which included around 2,200 households where the population was exposed to the highest levels of noise and are likely to be at greatest risk from significant health impact. It identified possible actions to address or reduce the risk such as noise barriers, low-noise road surface, and improved sound insulation. The Noise Action Plan also established the process for designating “Quiet Areas” and following this, the following four areas have been put forward as having potential to be designated as a quiet area: Queen’s Park – The Quiet Garden, Kipling Gardens, St Ann’s Wells Gardens – Sensory Garden and the Pavilion Gardens.

Transport and travel

Travel by road

3.43.24 The city has good road links via the A23 and A27 to London and to adjoining cities and towns along the south coast, to London Gatwick, as well as via the A259. However these roads are often congested, particularly at peak times and this can have a knock on effect causing additional congestion throughout the city.

3.43.25 The highway network experiences congestion during peak traffic hours and weekends, and in the summer months, tourist and leisure traffic adds to pressure. Key routes, such as the A23 and A27 Trunk Roads and the major distributor roads within the city centre such as the King’s Road, Marine Parade and Old Steine are where congestion peaks.³⁴

3.43.26 In 2011/2012, the average vehicle speed during peak hours (7-10am) on locally managed A-roads was 17.5 miles per hour. This is only slightly higher than the London average of 16.2 miles per hour. Analysis of speeds over a five year period shows little change, with speeds of 17.6 miles per hour in 2006/07. Journey times during the morning peak, measured by the average length of time to travel one mile was 3.77 minutes per mile in 2011/12. This compares to the London average of 4.34 minutes per mile. Analysis of journey times over a five year period shows a slight decrease from 3.86 minutes per mile in 2006/07.³⁵

3.43.27 At the time of the 2011 census³⁶, car and van ownership was relatively low, with almost two out of five households (38.2%) not owning a car or van. This

³³ [BH Noise Action Plan](#)

³⁴ [BH City Snapshot Report of Statistics 2014](#)

³⁵ [DfT Statistics –Congestion on Local Authority managed A roads](#)

³⁶ [Census Data taken from Neighbourhood Statistics](#)

compares to the England average of 25.2%. The total number of cars and vans increased by 4,348 between the 2001 and 2011 censuses. However, due to an increase in the number of households the average amount has decreased to an average of 0.86 cars per household compared to 0.87 in 2001. Across England, the average is 1.16 cars per household.

3.43.28 According to the Census, the most popular way of getting to work in Brighton & Hove is by car with 37.2% of the working age population travelling in this way. This is considerably less than the England average of 57%. Locally, use of cars as a mode to travel to work has decreased since the 2001 Census when 43.2% reported driving/being a passenger in a car to work.

Table 12: Comparison of car ownership and travel to work with England averages

Indicator	% of BH population (2001 Census)	% of BH population (2011 Census)	England average % (2011)
No Cars or Vans in Household	36.54	38.2	25.8
1 Car or Van in Household	43.82	42.6	42.2
2 Cars or Vans in Household	16.37	15.7	24.7
3 Cars or Vans in Household	2.56	2.7	5.5
4 or More Cars or Vans in Household	0.71	0.8	1.9
Travel to work mainly by bus or train	20.9	24.3	17
Travel to work by car (passenger or driver)	48.1	37.2	57
Travel to work by bike	2.7	4.9	3
Travel to work on foot	17.2	20.6	10.7

3.43.29 Car ownership and the method of travel to work varies greatly across wards. Not surprisingly, wards on the outer edges of the city, or those of a more suburban nature have a lower proportion of households with no car. Wards within the more central areas of the city, or those with a higher density of housing tend to have a much higher proportion of households with no car, as can be seen in the following table.

Table 13: Wards with high and low percentage of car ownership ³⁷

Ward	Households with no car %
Brighton & Hove average	38.2%
Regency	64%
Queens Park	59%
St Peters & North Laine	58%
Brunswick & Adelaide	55%
Hove Park	13%
Patcham	19%
Withdean	20%
Woodingdean	20%
North Portslade	21%
Rottingdean	22%

Public Transport

3.43.30 The city has good rail links to London and to adjoining cities and towns along the south coast and to London Gatwick. There are eight stations over three lines linking to the east, west and north. Brighton Station has the highest daily passenger volume of all stations along the south coast between Kent and Hampshire on the Southern Railway Network with an estimated daily passenger count of over 17,700, and an estimated annual count of around 6,400,000.³⁸ Brighton Station acts as a passenger interchange for all forms of transport and acts as a key gateway to the city.

3.43.31 Locally, long term bus use has increased from around 22 million journeys in 1992 to over 44 million in 2014/2015. However there has been a decrease in recent years as can be seen in the following table, although still shows a long-term upward trend.

Table 14: Bus passenger journeys 2009-2015 ³⁹

2009/2010	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015
40.9	42.4	43.3	45.2	45.8	44.4

3.43.32 Despite this decrease, Brighton & Hove has the highest bus use per head across all English authorities outside London. There were 167 bus journeys per head in Brighton & Hove in 2013/14 and is significantly higher than the England average (not including London) of 51 per head.⁴⁰ Factors such as

³⁷ [Brighton & Hove Community Insight data search](#)

³⁸ [Southern Railway](#)

³⁹ [DfT Passenger Journeys across Local Authority Areas 2014/2015 \(table BUS0109\)](#)

⁴⁰ [DfT Annual Bus Statistics 2013/14](#)

low levels of car ownership, high population density and availability and cost of bus services are all known to be strongly linked to use of buses.

- 3.43.33 According to the 2011 Census 10.4% of the population travel to work by train and 13.6% travel to work by bus. These are both higher than the England average, where 5.3% travel by train and 7.5% travel by bus. Both represent an increase since 2001 levels.
- 3.43.34 The current bus network radiates from a number of city centre “hubs” at Churchill Square, Old Steine and Brighton Station. Orbital links connect some outer suburban areas of the city with the central area. There is little spare capacity at key interchange locations and further expansion is constrained. Bus congestion and capacity constraints exist on North Street and Western Road.⁴¹

Walking & Cycling

- 3.43.35 The city contains a number of cycle routes including National Cycle Route 2 (the coastal route) and 20 (from Crawley into Brighton), and Regional Cycle Route 82 (links Devil’s Dyke to Hove) and 90 (Lewes to Brighton). There are also a number of local cycle routes and on-street lanes, although there are areas that do not have cycle lanes, as well as missing links between key parts of the network.⁴²
- 3.43.36 There has been much investment in improving infrastructure for cyclists over the last 10 years, including funding through the Cycling Demonstration Town award which resulted in improved routes, additional cycle parking and advance cycle lines. The LTP4 sets out further investment to be delivered including improvements to key routes and cycle priority at key junctions.
- 3.43.37 Cycle counters exist at various locations throughout the city which allow the annual average daily cycle count to be calculated. The count has increased from 7,052 in 2013/2014 to 8,603 in 2014/2015.⁴³ The number of cycle stands has increased, with around 100 stands per year being installed since 2005. In 2014/2015 the total number of cycle stands across the city was 3,157 up from 2,853 in 2013/2014.⁴⁴
- 3.43.38 According to the Census 2011 4.9% of the population travel to work by bike. This is higher than the England average of 3% and represents a 45% increase since the 2011 Census when the rate was 2.7%.
- 3.43.39 Walking is a popular travel choice amongst residents, with almost double the national average of residents walking to work when compared with the

⁴¹ [BH City Snapshot Report of Statistics 2014](#)

⁴² [BHCC LTP4](#)

⁴³ [BHCC Annual Performance Report 2014/2015](#)

⁴⁴ [BHCC Annual Performance Report 2014/2015](#)

England average (20.6% locally compared to 10.7% across England – Census 2011). The amount of people walking to work has increased from 17% in 2001. However, some of the pedestrian and cycle links between the areas that people want to get to are not as good as they could be, streets can be cluttered, materials are inconsistent and there may be too few places to rest.⁴⁵

3.43.40 There is a large Public Right of Way network across Brighton & Hove covering approximately 70 miles. The network is well used and facilitates links from the urban area into the Downs. The Public Right of Way Improvement Plan 2007-2017 identified a number of missing links which would help to improve route coherence and reduce less sustainable means of travel if implemented.

Commuting Patterns

3.43.41 According to the Census 2011, the city is a net exporter of commuters. In 2011 31,915 people travelled into the city and 37,310 travelled out of the city for work.

Transport-based carbon emissions

3.43.42 Transport accounts for around a quarter of UK greenhouse gas emissions. Transport based emissions of CO₂ have decreased from 1.4 tonnes per capita in 2005 to 1.1 tonnes per capita in 2013.⁴⁶ Carbon emissions from transport account for 25% of the total carbon emissions in Brighton & Hove. This is slightly less than the average across England of 28%, or 1.9 tonnes per capita.

Road-traffic accidents

3.43.43 The total number of collisions and casualties have decreased since 2010 from a total of 2,011 in 2010 to 1,780 in 2014.⁴⁷ Despite this overall downward trend, the number of people killed or seriously injured has not shown the same pattern of reduction. Those who are particularly at risk include cyclists, pedestrians and people using powered two wheeled scooters.

⁴⁵ [BHCC LTP4](#)

⁴⁶ [DECC 2005 to 2013 UK local and regional CO₂ emissions full dataset](#)

⁴⁷ [BHCC Road collision and casualty data](#)

3.44 LIKELY FUTURE BASELINE

- 3.44.1 Trends indicate that air quality in lower density areas and suburban areas will continue to improve. Although trends suggest that NO₂ concentrations in city centre locations are improving, it is unknown whether those in this location, particularly those which have a confined or narrow streetscape will improve to meet the air quality objective.
- 3.44.2 National trends indicate an increase in car ownership. Figures from Brighton & Hove suggest that the level of car ownership per household is likely to remain below the national average and may continue on a downward trend. However, the overall amount of cars owned in the city is likely to increase, due to the anticipated increase in population.
- 3.44.3 Congestion has shown little improvement in recent years. Congestion is anticipated to worsen in the long-term, based on an increase in population and associated car ownership.
- 3.44.4 Recent analysis suggest that bus patronage has decreased in the short-term, however longer term trends, including travel to work trends suggest that bus patronage should increase again in the long-term. However above inflation increases in bus travel may result in an ongoing reduction in bus-patronage.
- 3.44.5 Local investment in cycling infrastructure, such as improvements to key cycling corridors, advanced cycle signals at some junctions and completion of missing-links within the existing cycle network, as well as local trends suggest that travel by bike is likely to increase.
- 3.44.6 Transport based carbon emissions show a downward trend and this is expected to continue. This could be partially based on an increase in electric vehicles, rather than a decrease in car usage as such.
- 3.44.7 It is likely that road-traffic related noise will also increase, based on the likelihood that transport movements will continue to increase.

3.45 SUSTAINABILITY ISSUES

- 3.45.1 The key sustainability issues identified from the context and baseline review are:
- Road congestion is an issue, particularly at peak times, resulting in delays to emergency vehicles, delays to the local bus services as well as having detrimental economic impacts.
 - There is limited potential for expansion of both the local bus network and also the capacity on the train network, with both suffering from congestion at peak times.

- Transport-based carbon emissions form a quarter of all local carbon emissions.
- Air quality continues to exceed the air quality objective in certain locations, including central areas, as well as those where the streetscape prohibits the dispersal of air pollutants.
- Traffic related noise is an issue at many roads and junctions
- The public realm can be difficult to navigate in some places and can be prohibitive to walking, particularly for older people, disabled people, and people with pushchairs.
- There is conflict between different road-users, with cyclists, pedestrians and people using powered scooters being particularly vulnerable to road traffic accidents.
- There are a number of health issues arising from transport, including those relating to air quality and noise, but also road safety and active living, with fear of traffic being a deterrent to people travelling more actively

3.46 DATA LIMITATIONS

3.46.1 There has been no further update or mapping exercise carried out on noise levels, and these were based on estimates rather than actual noise recording.

3.46.2 There is a lack of recent data on average journey times.

3.46.3 Data on commuting patterns varies according to different sources. There are no further updates on commuting patterns and there are none planned to be released by Office for National Statistics.

3.47 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.47.1 The following SA Objective and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To reduce the need to travel, encourage sustainable modes of travel and improve travel choice.	<ul style="list-style-type: none"> • Encourage mixed-use development and sustainable communities that reduce the need to travel • Encourage the location of development close to where use of sustainable transport can be maximised

	<ul style="list-style-type: none"> • Improve public and sustainable transport infrastructure including links and access • Encourage health-beneficial forms of transport including cycling and walking • Promote low-carbon forms of transport • Improve road safety to encourage cycling and walking • Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations • Protect and enhance public rights of way
To improve air and noise quality	<ul style="list-style-type: none"> • Minimise the causes of air pollution • Support the development of cleaner technologies (e.g. low-emission vehicles) • Take account of Air Quality Management Areas, where relevant. • Reduce the need to travel • Support measures that reduce road related noise

Sites

3.47.2 The following SA Objective and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To reduce the need to travel, encourage sustainable modes of travel and improve travel choice.	++	Very good access (<400m ⁴⁸) to a bus stop offering frequent services (more than once every 10 minutes); and/or 800m to a train station. Well connected to pedestrian/cycle network. Range of essential services nearby e.g. local shop (<400m). Site likely to be able to deliver an element of car-free/low-car housing.
	+	Fairly good access (between 400-800m) to a bus stop offering frequent services (more than once every 10 minutes). Fairly well connected to pedestrian/cycle network. Scope for improving public and sustainable transport provision. Essential services located between 400-800m. Site may be able to deliver an element of car-free/low-car housing.
	0	
	-	Nearest frequent bus service located more than 800m from site. Limited availability to other forms of public and/or sustainable transport. Local services (shops) located more than 800m. Some scope for improvement to public/sustainable transport services.
	--	Site located so that the car is likely to be the preferred mode of transport. Limited potential

⁴⁸ 400m equivalent to a 5 minute walk. Distances people are willing to walk for bus stop/local shops taken from Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000.

		to increase/improve public transport provision. Local services situated more than 800m away
To reduce air and noise pollution.	++	Site located outside AQMA. Site located away from roads with daytime noise levels exceeding 55 decibels. Site use unlikely to generate significant numbers of traffic that would potentially contribute to a reduction in air quality/noise quality.
	+	Site located adjacent but not within AQMA. Sites located away from roads with daytime noise exceeding 55 decibels. Site use unlikely to generate significant numbers of traffic at all times of the day but may generate traffic at certain times of the day.
	0	
	-	Site partially located within AQMA. Site located in close proximity to roads with noise levels exceeding 55 decibels in the daytime. Potential use of site likely to generate moderate amounts of traffic at various points of the day.
	--	Site located entirely within AQMA. Site is located within an existing streetscape that may prohibit pollutant dispersal. Site located in close proximity to roads with noise levels exceeding 55 decibels in the daytime. Potential use of site likely to generate high amounts of traffic at various times of the day. Potential use of the site is not compatible with AQMA restrictions.

3.5 Topic 5: Climate Change and Flooding

3.51 INTRODUCTION

3.51.1 Climate change is recognised as one of the most serious challenges facing the UK. In recent decades evidence demonstrates that an unprecedented rise in global temperatures has occurred over the last century or so. Scientific consensus attributes this change to emissions of greenhouse gases, primarily carbon dioxide (around 75%) from combustion of fossil fuels for energy generation or transport.

3.51.2 Other greenhouse gases present in the atmosphere include methane from fossil fuels and landfill waste, nitrous oxide from fertilisers and industrial processes, chlorofluorocarbons and hydro-chlorofluorocarbons. These are found in far smaller quantities than carbon dioxide but have greater global warming potential.

3.51.3 The impacts of a changing climate would include changes in the availability and quality of water resources, drier soils, an increase in extreme weather events including events that result in flooding, damage to native habitats and migration or extinction of native plants and animals. It is likely that there will be significant impacts on the economy, particularly in the long term as more money is required to be spent on adaptation. Agriculture may need to adapt. Patterns of mortality would change, with fewer premature deaths in winter from cold but probably more deaths from higher temperatures in the summer.

3.51.3 This chapter sets out the sustainability context and baseline in regards to climate change. This includes emissions, effects and adaptation where data is identified. This chapter also includes information on flood risk from various sources. The chapter also sets out the sustainability issues and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.52 CONTEXT REVIEW

3.52.1 Key documents reviewed:

- Kyoto Protocol 1997
- EU Renewable Energy Directive 2009
- EU Energy Efficiency Directive 2012
- EU Flood Risk Directive 2007
- Energy Act 2011
- Renewable Energy Strategy 2009
- Climate Change Act 2008
- National Adaptation Programme 2013
- Flood and Water Management Act 2010
- National Flood and Coastal Erosion Risk Management Strategy 2011

- NPPF 2012
- BH City Sustainability Action Plan 2015
- BH Sustainable Community Strategy 2014
- Climate Change Strategy 2011
- Renewable & Sustainable Energy Study 2012
- Shoreline Management Plan and relevant Strategies 2006
- BH Strategic Flood Risk Assessment 2012
- BH Surface Water Management Plan 2013
- BH Flood Risk Management Strategy 2015

3.52.2 The key sustainability objectives and messages coming from the context review are to:

- Reduce energy use, increase energy efficiency and increase renewable and low carbon energy generation
- Increase resilience to future climate change impacts through incorporation of climate adaptation techniques such as green infrastructure, permeable surfacing and shading
- Direct development away from areas of high flood risk where possible, ensure safety and ensure flood risk is not increased elsewhere
- Reduce the risk of flooding where it currently exists
- Avoid inappropriate development in areas at risk of possible coastal change

3.53 CURRENT BASELINE

Climate Change

Climate Change Targets

3.53.1 The Climate Change Act 2008 commits the UK Government to achieve an 80% reduction in Carbon Dioxide emissions by 2050 based on a 1990 baseline. This data (1990 greenhouse gas emissions) is not available for Brighton and Hove, so CO₂ is used as an indicator, and the baseline year is set to 2005, which is consistent with other local authority areas. Locally the Sustainable Community Strategy set an interim target of achieving a 42% reduction by 2020. In 2012, the city had achieved a 17.6% reduction target against a target of 28% from the 2005 baseline.⁴⁹

Carbon Emissions

3.53.2 Carbon dioxide is emitted from the combustion of fossil fuels. Carbon dioxide emissions are measured to cover the following sources: Industrial & Commercial, Domestic and Transport. Domestic emissions only cover the amount of energy used in the home and does not, for instance include the energy used to produce goods used in the home.

⁴⁹ [BHCC Annual Performance Report 2014/2015](#)

Table 15: Sources of carbon emissions 2013 ⁵⁰

Source	Brighton & Hove 2013 (tonnes of CO2/capita)		England average 2013 (tonnes of CO2/capita)	
Industrial & Commercial	1.4	33%	2.8	42%
Domestic	1.8	42%	2.0	29%
Transport	1.1	25%	1.9	28%
Total	4.3		6.7	

3.53.3 In Brighton & Hove, carbon emissions generated by energy consumption from domestic buildings make up the greatest proportion of total carbon emissions. The domestic proportion of carbon emissions is higher in Brighton & Hove when compared with the England and regional averages. This can be partly attributed to local circumstances, such as the high number of listed buildings (3,370); the proportion of the built up area that is within conservation areas (17%); and the higher than national average proportion of pre 1919 and interwar stock which is less energy efficient (66% for Brighton & Hove compared to 43% for England). Many older houses have solid walls and are also more difficult to insulate than modern housing.

Table 16: Total carbon emissions and carbon emissions per capita 2005-2013⁵¹

Year / Source	Industrial/ Commercial (tonnes/capita)	Domestic (tonnes/ capita)	Transport (tonnes/ capita)	Total (tonnes/ capita)	Total kilo- tonnes /CO2/capita
2005	1.8	2.4	1.4	5.5	1,389.3
2006	1.8	2.3	1.3	5.4	1,386.0
2007	1.7	2.2	1.3	5.3	1,357.1
2008	1.7	2.2	1.2	5.1	1,337.5
2009	1.5	1.9	1.2	4.6	1,221.1
2010	1.5	2.1	1.1	4.7	1,279.0
2011	1.3	1.8	1.1	4.2	1,148.6
2012	1.5	1.9	1.1	4.5	1,234.3
2013	1.4	1.8	1.1	4.3	1,185.5

3.53.4 Transport based carbon emissions per capita are showing a downward trend and have decreased since 2005. Domestic emissions are heavily influenced by external temperatures with colder periods resulting to an increased demand for heating. This is likely to be why domestic emissions fluctuate. However, looking at longer term trends, per capita emissions from the domestic sector have also decreased since 2005. Overall, total per capita emissions have decreased by 22% since 2005. In addition, the overall total amount of kilo-tonnes of carbon dioxide has also decreased since 2005 showing that the overall per capita reduction is a reduction in real terms and isn't just the result of an increase in population.

⁵⁰ [DECC Carbon Emissions by Local Authority Area 2005-2013](#)

⁵¹ [DECC Carbon Emissions by Local Authority Area 2005-2013](#)

3.53.5 An analysis of the city's carbon footprint by BioRegional with Stockholm Environmental Institute in 2006, looked at all products and services we consume, rather than simply relying on energy and transport-based data to base carbon emissions. This report worked out the average carbon footprint per person to be 13.18 tonnes per person per year, compared to UK average of 12.10t/p/year. This figure is combined with the ecological footprint to make the total greenhouse gas footprint per person of 17.81 tonnes per year.⁵²

Reducing the city's carbon emissions

3.53.6 Under the City Plan Part 1 all new development is required to achieve certain standards of energy efficiency. However there is also a need to improve energy performance in existing buildings, as set out in the Brighton & Hove Energy Study.⁵³ The study maps out how carbon reduction targets can be met. New development is expected to increase the city carbon footprint by 8%. Grid decarbonisation is expected to deliver 76% reductions in carbon emissions. Other measures that are required to meet the carbon reduction target as follows: retrofit of existing residential buildings (19% reduction); retrofit of existing non-residential buildings (11%); and 2% reduction through large scale energy infrastructure.

3.53.7 The Study was undertaken at a time when new build was required to meet Code for Sustainable Homes Level 5. The new requirements from 2016 (building to equivalent CSH level 4) mean that carbon reductions from other sources will need to be even greater in order to meet local carbon reduction targets.

3.53.8 Development of low carbon and renewable energy is crucial to support the transition to a low carbon future, as required by national policy. Sub-regional statistics indicate renewables capacity in Brighton and Hove is below comparator cities with mostly small scale with fewer non-domestic applications.⁵⁴ In the first quarter of 2016, there were 131 domestic photovoltaic installations per 10,000 population, compared to an average of 272 installations per 10,000 population across the UK.

3.53.9 Improvements in domestic energy are also an important part in reducing fuel poverty, which is higher in the city than the England average. (*See Topic Chapter 7: Population, Health & Inequalities*).

⁵² Climate Change Strategy 2011-2015

⁵³ [Brighton & Hove Renewable and Sustainable Energy Study 2012](#) (AECOM)

⁵⁴ <https://www.gov.uk/government/statistical-data-sets/sub-regional-feed-in-tariffs-confirmed-on-the-cfr-statistics>

Flooding

Sources of flood risk

3.53.10 Parts of Brighton & Hove are at risk of flooding from tidal, groundwater and surface water. There is no fluvial flood risk. The extent of flood risk increases when climate change is taken into account.

3.53.11 A Strategic Flood Risk Assessment (SFRA) was completed in 2008 and further updated in 2012 to assess the nature and extent of flood risk in the city. In addition, as the lead local flood authority, the council has carried out and published a Preliminary Flood Risk Assessment (2011), a Surface Water Management Plan (2014), and a Local Flood Risk Management Strategy (2015). The findings are set out below.

Tidal flood risk

3.53.12 The majority of the city is situated Flood Zone 1, low probability of flooding. The city shares approximately 14km of its boundary with the sea. Some areas of the coast are situated within Flood Zone 2 (medium probability), Flood Zone 3a (high probability) and Flood Zone 3b (functional floodplain). Much of the area at risk from tidal flooding is protected by defences, however there remains a residual risk that the defences could fail or be over-topped during a flood event. The effects of climate change, including sea level rise means that the Standard of Protection provided by the existing defences may reduce over time.

3.53.13 The two areas of the city at greatest risk of tidal flooding are Portslade, including the eastern arm of Shoreham Harbour and the Marina.

3.53.14 Wave-over topping has occurred in recent years at high-tide, and during times of severe storms that particularly affected coastal areas. Waves over-topped the shingle and resulted in road flooding, on parts of Madeira Drive.

Ground water flood risk

3.53.15 There is a potential risk of groundwater flooding due to the high permeability of the underlying chalk. An assessment of groundwater flood risk carried out as part of the SFRA showed that groundwater flood risk varies across the city. Areas that are topographically located within “dry valleys” are at a greater risk to those that are of higher topography. There are areas that are of particular high risk of groundwater flooding, and where flood events have happened in recent years, including areas in Portslade Old Village and in Patcham. The risk of flooding in Patcham occurs when the groundwater levels reach around 45m AOD.

3.53.16 A flood investigations report outlining the groundwater flooding events from recent years was published in 2014 following a period of flooding.⁵⁵ Flood events in 2014 caused the following to be flooded:

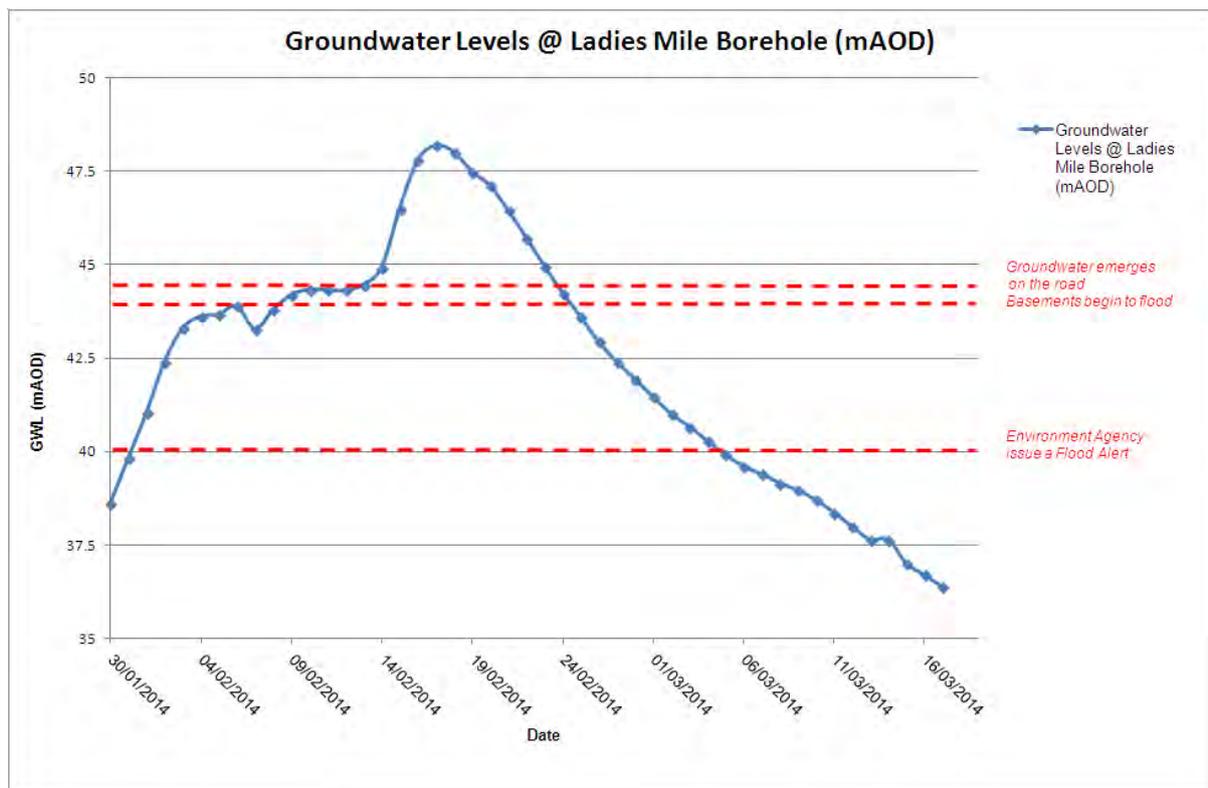
- Seven cellars and one basement dwelling in Patcham
- Four basements in Portslade

⁵⁵ [Groundwater Flooding in Brighton & Hove \(BH2014\)](#) Flood Investigation Report

- A basement on Preston Road
- A basement in Peacock Lane
- Railway between Patcham and Preston Park
- Underpass in Coldean
- The road at The Highway, Bevendean
- The road at Audrey Close and Brangwyn Drive, Patcham

3.53.17 The following shows the groundwater levels during the period of flooding in 2014.

Figure 7: Groundwater level at Ladies Mile Borehole January to April 2014 ⁵⁶



3.53.18 Prior to 2014, the most significant period of groundwater flooding occurred in 2000/2001.

Surface water flood risk

3.53.19 Surface water flood risk generally occurs as a response to periods of heavy rainfall where the sewers become inundated with rainwater and the system becomes overwhelmed. Surface water flooding can also be a result of sewer flooding, as well as groundwater flooding. Surface water flooding is a particular risk in urbanised areas where there are less natural features that would naturally absorb water. There are eight well defined surface water flow routes in the city. The largest area is along the A23 and A270 which form a

⁵⁶ [Groundwater Flooding in Brighton & Hove \(BH2014\)](#) Flood Investigation Report

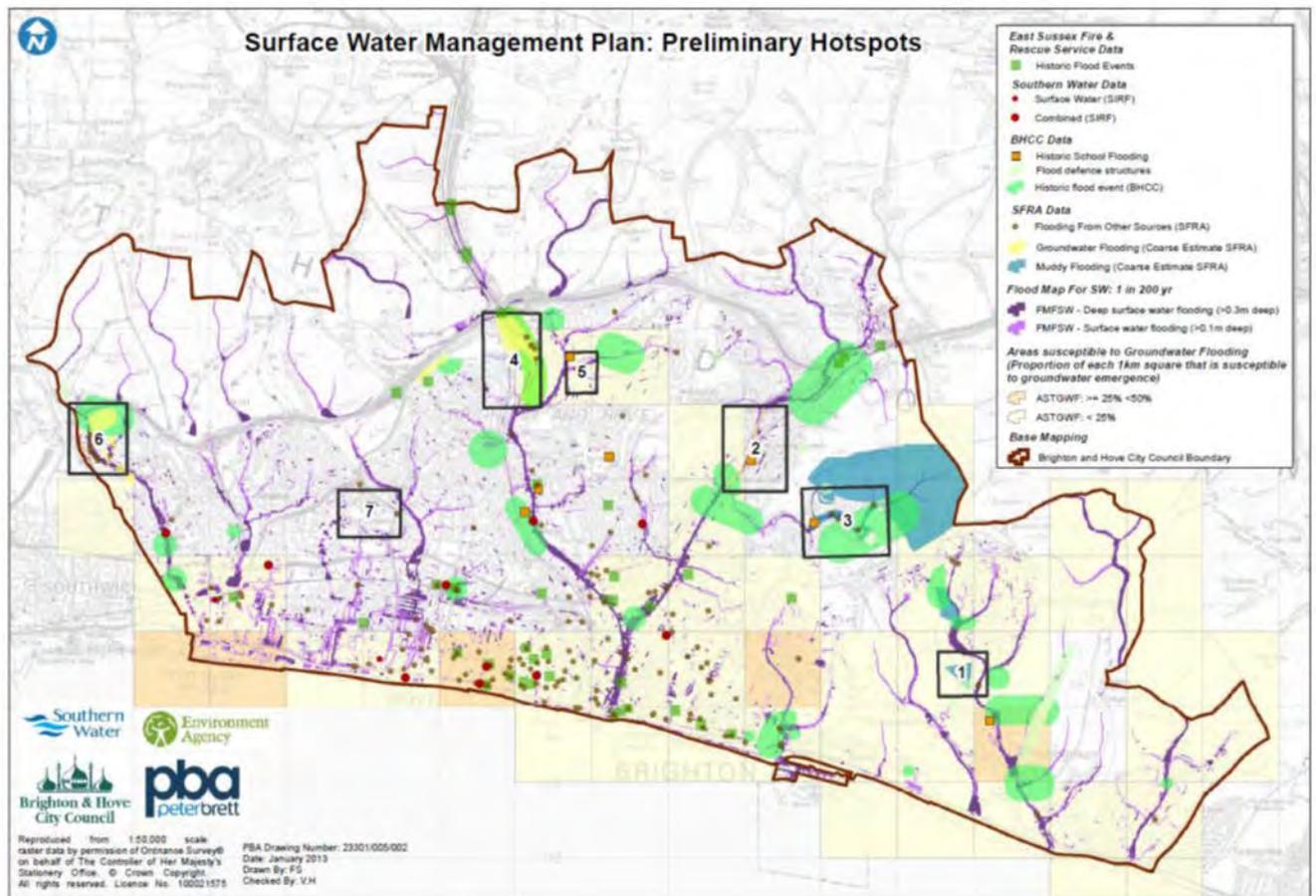
“y” shaped route in the centre of the city. There are also significant flow routes in Hove.

3.53.20 The Surface Water Management Plan and Preliminary Flood Risk Assessment carried out by the council identified seven hotspots where there is significant risk of surface water flooding as follows, in order of highest risk first:

- Mile Oak (6 on map)
- Bevendean (3)
- Patcham (4)
- Carden Avenue / Warmdene Road (5)
- Moulsecoomb Primary School (2)
- Ovingdean – Kett’s Ridge (1)
- Blatchingam Mill School (7)

3.53.21 These areas can be seen in the following map which also identifies other sources of flood risk.

Figure 8: Surface Water Flood Risk Hotspots⁵⁷



⁵⁷ [BHCC Local Flood Risk Management Strategy 2015](#)

3.53.15 In July 2014, there was a rainfall event, which highlighted the risk of surface water flooding in Brighton and Hove. A high intensity rainfall event occurred over Hove and Portslade with 73.5mm of rainfall recorded over the day. The Environment Agency Hydrocast data showed that the majority of this rainfall fell in the first two hours of the storm. Over 100 properties were affected by flooding; these were predominantly basements.

COASTAL DEFENCES

3.53.16 Brighton & Hove's coastline extends from Shoreham Port in the west to Saltdean in the east. The formation of the western end was influenced by the River Adur, which now reaches the sea to the west of the city boundary opposite Shoreham-by-sea. The low lying land of the coastal strip extends eastwards to Pool Valley and the Old Steine both of which used to be influenced by the sea. From this point a cliff line rises towards the east behind Madeira Drive and runs on to Saltdean and beyond to Newhaven.

3.53.17 The long term management and planning of sea defences is dealt with locally through the Southdown's Shoreline Management Plan. The SMP tries to predict rates of coastal erosion and has assessed the rate of erosion for Brighton and Hove's coastline over the next 100 years as negligible and has an overall strategy position of "hold the line".

3.53.18 There are two strategies that follow on from the SMP: Brighton Marina to Saltdean, and Brighton Marina to the River Adur.⁵⁸ The Marina to Saltdean strategy recommends maintaining the current defences between Ovingdean Gap and Saltdean and reconstruction of the defences between Ovingdean Gap and the Marina, for instance around the Undercliff Walk.

3.53.19 The Brighton Marina to River Adur strategy recommends improving the defences in the Shoreham Harbour and the open coast Shoreham to the Marina) to protect against a 0.5% (1 in 200 year) event. This would be an improvement from the current standard of protection: the Shoreham Locks are current at a 100% risk of flooding (1 in 1 year event). The open coast ranges from a 100% risk to a 0.2% risk (1 in 500 year) event. The study recommends sustaining the current level of protection at Brighton Marina (currently 0.5% AEP). The study recommends a number of measures that are required along the coast at Southwick Beach to Portslade, Western Esplanade, Hove Deep Sea Anglers' Buildings, Kings Esplanade and Lower Promenade which will reduce the risk of erosion and flooding due to wave overtopping. Improvement works to the lock gates at Shoreham Locked Section are recommended to address flood risk.

⁵⁸ [Brighton Marina to Saltdean, and Brighton Marina to the River Adur Strategies](#)

3.54 LIKELY FUTURE BASELINE

3.54.1 The UK Climate Impacts Programme coordinates scientific research into the impacts of climate change and provides scenarios for what the impacts will be in particular locations. Looking at climate change scenarios for the whole of the South East it predicts that in the 2020s average temperatures will have increased by 1-1.5°C, there will be 5-15% less rainfall, the soils will be 10% drier and there will be an increase in extreme weather events, including droughts, storm surges, heavy rainfall and floods.

3.54.2 It is anticipated that carbon emissions from domestic sources will continue to increase, based on the amount of new residential development that will come forward, if the City Plan Part 1 housing target is achieved. There is no requirement for these dwellings to be zero carbon and even the achievement of a 19% reduction in Part L energy standards will result in an overall increase in carbon emissions from this source.

3.54.3 An overall reduction in rainfall, as predicted by the climate impacts programme could lead to less water to recharge groundwater resources and may result in more drought events. However increased periods of heavy rainfall could result in more episodes of groundwater and surface water flooding.

3.54.4 The risk of tidal flooding in Shoreham Harbour and the open coast areas should decrease due to planned coastal defence work. The risk of tidal flooding at Brighton Marina remains the same, and could increase based on climate change impacts and based on the anticipated future development in this area.

3.55 SUSTAINABILITY ISSUES

3.55.1 The key sustainability issues identified from the context and baseline review are:

- Carbon emissions from domestic sources are higher than average and are likely to remain high unless efficiency in existing buildings is improved.
- The city has a substantial housing target, which is likely to result in an overall further increase in carbon emissions from domestic sources.
- Increased temperatures may result in higher demands for cooling and air conditioning within buildings, particularly existing buildings which are not adaptable to climate change.
- The city has a challenging carbon emissions reduction target to achieve. There is a need to continue to increase the amount of energy produced from renewable or low carbon energy sources in order to achieve this

target, however the city has various constraints that may limit this, such as heritage and air quality issues.

- The city will need to become more resilient to the impacts of climate change, including through measures that may help provide natural shading, reduce localised temperatures and prevent flood events.
- Some of the city's strategic sites are located in areas of high flood risk. Development in other areas may also be situated in areas of higher flood risk, due to limited land availability.
- There are a significant amount of basement properties in the city which are at increased risk of flooding.
- The number of properties and people at risk from groundwater and surface flooding may increase due to predicted increases in periods of heavy precipitation and the likelihood that new developments may be built in areas of higher flood risk, due to limited land availability.

3.56 DATA LIMITATIONS

3.56.1 The most recent data available for carbon emissions is from 2013 due to there being a two year time-lag. Data therefore does not reflect the most up to date scenario. Emissions data is only available from 2005 therefore making it difficult to accurately predict long-term patterns.

3.56.2 The SFRA is undertaken at a strategic level and involves a degree of forecast and modelling when determining the likely areas that will be under threat of flood risk and to which degree.

3.57 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.57.1 The following SA Objective and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To reduce emissions of greenhouse gases that cause climate change	<ul style="list-style-type: none"> • Encourage renewable energy generation • Encourage low/zero carbon development • Encourage energy efficient design • Facilitate development of decentralised energy networks • Encourage adoption of nationally described building standards / or environmental standards
To increase the city's	<ul style="list-style-type: none"> • Considers the potential risks and consequences of

resilience and ability to adapt to climate change.	<p>flood risk and does not increase flood risk elsewhere.</p> <ul style="list-style-type: none"> • Incorporates sustainable drainage techniques, including those that have benefits for biodiversity. • Incorporates features that may help to maintain temperatures, such as green roofs and tree-planting and recognise the services provided by ecosystems. • Ensures the design of development considers the future impacts of climate change. • Incorporates features to maximise efficient use of resources.
To reduce the risk from all sources of flooding to and from development	<ul style="list-style-type: none"> • Direct development to areas of lower flood risk (all sources of flooding) • Incorporates measures to reduce vulnerability to flood risk • Ensure the risk of flooding elsewhere is not increased by development • Incorporates sustainable drainage techniques • Maintains or improves coastal defences

Sites

3.57.2 The following SA Objective and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To reduce emissions of greenhouse gases that cause climate change	++	Site offers good potential to connect to existing/future heat network. Site has good potential to incorporate low/zero carbon energy infrastructure, e.g. solar, wind etc.
	+	Site has some potential to connect to existing/future heat network. Site has some potential to incorporate low/zero carbon energy infrastructure.
	0	
	-	Limited potential to connect to existing/future heat network. Limited potential to incorporate other low/zero energy infrastructure.
	--	No potential to connect to existing/future heat network. No potential to incorporate other forms of low/zero carbon energy infrastructure.
To increase the city's resilience and ability to adapt to climate change.	++	Site is on PDL and offers opportunity to increase green infrastructure and/or improve flood defences.
	+	Site is mainly PDL and offers some opportunity to increase green infrastructure and/or improve flood defence.
	0	
	-	Greenfield site with possibility of retaining some but not all Greenfield functions (e.g. ecosystem services such as water absorption, temperature moderation etc).

	--	Greenfield site with no possibility of retaining any Greenfield functions.
To reduce the risk from all sources of flooding to and from development	++	Site is PDL: Site is situated entirely within Flood Zone 1. Whole site located in area at low risk (<25% risk) of groundwater flooding. None of site has any risk of surface water flooding.
	+	Site is PDL: Site is situated within Flood Zone 1 or partially in Flood Zone 2. Small part (<25%) of site in an area considered to be at medium risk (25-50% risk) of groundwater flooding. Small part of site (<25%) has risk of surface water flooding (>0.1m in 1 in 30 year event) but is not within a SW hotspot area. Site is greenfield: Site is situated within Flood Zone 1. Whole site located in area at low risk (<25% risk) of groundwater flooding. None of site has any risk of surface water flooding.
	0	
	-	Site is PDL: Site is situated within Flood Zone 1 or 2. Large part (>50%) of site located in an area considered to be at medium risk (25-50%) of groundwater flooding. Large part (>50%) of site at risk of surface water flooding (>0.1m) in 1 in 30 year event or located within a SW hotspot. Site is Greenfield: Site within Flood Zone 1 or 2. Part of site in area of medium risk (25-50%) of groundwater flooding. Part of site has risk of surface water flooding (>0.1m in 1 in 30 year event) but is not within a SW hotspot area.
	--	PDL site located partially or wholly situated within Flood Zone 3a or 3b. Or, is a PDL site is in Flood zone 1 or 2 and is located within an area of high risk (>50%) of groundwater flooding, and/or risk of deeper water flooding (>0.3m) surface water flooding in 1 in 30yr event; or is within a SW hotspot area. Greenfield site: site located within an area of high risk (>50%) of groundwater flooding, and/or risk of deeper water flooding (>0.3m) surface water flooding in 1 in 30yr event; or is within a SW hotspot area.

3.6 Topic 6: Cultural Heritage, Landscape and Open Space

3.61 INTRODUCTION

3.61.1 Cultural heritage is the legacy of physical artefacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and bestowed for the benefit of future generations. It includes the historic environment of monuments, buildings, groups of buildings and sites which are of value because of their heritage interest. That interest may be archaeological, architectural, artistic or historic.

3.61.2 Landscapes can be areas designated for natural beauty and/or ambience but can also be 'ordinary' places that are not given statutory protection. Urban landscapes also have an important role to play in affecting health and the quality of people's lives, therefore acknowledging and enhancing 'townscapes' is also important.

3.61.3 Different landscapes have differing landscape characters. The Landscape Character Network define landscape character as 'a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another'. Essentially it is the landscape character of an area that gives it its distinctive and unique feel.

3.61.4 Open spaces form an essential and important part of the city. Open spaces include natural and semi-natural open spaces, allotments, cemeteries, parks, children's play-space, outdoor sports provision and amenity green-space. The beach also forms an important source of open space in the city.

3.61.5 This chapter sets out the sustainability context and baseline in regards to cultural heritage, landscape and open space. The chapter also sets out the sustainability issues and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.61.6 Maps to support this section can be found in Appendix D.

3.62 CONTEXT REVIEW

3.62.1 Key documents reviewed:

- EU Protection of Archaeological Heritage (1992)
- EU Landscape Convention (2000)
- National Parks & Countryside Act (1949)
- Government's Statement on the Historic Environment for England (2010)
- NPPF (2012)
- Conservation Principles, Policies and Guidance (Historic England 2008)
- Streets for All - South East (2005)
- A Strategy for the Conservation of Brighton & Hove's Historic Built Environment (2015)

- The Downland Initiative (2006)
- South Downs Integrated Landscape Character Assessment (2011)
- South Downs Green Infrastructure Framework Consultation Draft (Jan 2016)
- Urban Characterisation Study (2009)
- Public Space, Public Life Study (2008)
- Streetscape Design Guidelines (2010)
- Open Space, Sport and Recreation Study & Updates (2009 & 2011)
- Allotment Strategy 2014-2024 (2014)
- Draft Seafront Strategy (2012)
- Food Strategy & Action Plan (2012)
- Green Network for Brighton & Hove (2009)
- Rights of Way Improvement Plan 2007-2017
- Health & Wellbeing Strategy (2015)
- Indoor Sports Facilities Plan 2012-2022
- Urban Fringe Assessments (2014 & 2015)

3.62.2 The key sustainability objectives and messages coming from the context review are to:

- To understand, conserve and manage heritage assets in accordance with their significance
- To create an accessible historic environment that everyone can identify and engage with
- To ensure that new development makes a positive contribution to local character and distinctiveness.
- To respect the special character of all landscapes, townscapes and streetscapes
- To protect and enhance valued landscapes
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the SDNP and its setting
- To promote opportunities for the understanding and enjoyment of the special qualities of the SDNP
- To foster the social and economic wellbeing of the local communities within the National Park
- To recognise the contribution that open space, sports and recreation make to health and well-being
- To maximise opportunities to provide green infrastructure and links to the existing green network/Nature Improvement Area
- To increase opportunities to facilitate active lifestyles
- To identify opportunities for provision of new open space/sports facilities where required and ensure need is based on up to date assessment
- Ensure sufficient availability of good quality, accessible land for allotments.
- Improve links to all types of open spaces

3.63 CURRENT BASELINE

Cultural Heritage

3.63.1 The historic built environment of Brighton & Hove, particularly its rich Regency and Victorian legacy is recognised as being of regional importance. The 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 the positive visitor experience and tourism revenue, which is important to the local economy.

Listed Buildings

3.63.2 Listed buildings are structures which are considered to have special architectural or historic interest and are of national importance. The Department of Culture Media and Sport (DCMS) compiles the register of listed buildings on the advice of Historic England.

3.63.3 Buildings are graded to show their relative importance as follows:

- Grade I: These are buildings of exceptional interest
- Grade II*: These are particularly important buildings of more than special interest
- Grade II: These are buildings of special interest which warrant every effort being made to preserve them (92% of all listed buildings nationally).

3.63.4 The following table shows the amount of listings (which also includes groups of buildings in one listing).⁵⁹

Table 17: Type and number of listed buildings

Grade	Number
Grade I	24
Grade II*	71
Grade II	1137

3.63.5 It should be noted that the above table does not fully reflect the amount of individual listings in Brighton & Hove, for example, 1-29 Brunswick Square is defined as one listing on the Historic England register, however comprises 29 individual buildings. There are 479 individual Grade I and Grade II* buildings in the city and in total, there are around 3,400 individual listed buildings and structures in the city.

3.63.6 Historic England maintains the list of assets at risk at grade I and II*⁶⁰. There are nine such listed buildings currently at risk:

- St Patrick Church, Hove
- St Mary The Virgin Church, Brighton

⁵⁹ [Historic England search of register May 2016](#)

⁶⁰ [Historic England search of at risk register May 2016](#)

- St Peter’s Church, Brighton
- St Paul’s Church, Brighton
- The West Pier
- Marlborough House, Brighton
- 53 Brunswick Square, Hove
- Saltdean Lido, Saltdean
- The Hippodrome, Brighton

3.63.7 The number of Listed Buildings at risk has increased from 7 to 9 since 2013. The council keeps its own register of Buildings at Risk, which also includes those grade II buildings at risk. There are 12 grade II buildings on the most recent register.

Conservation Areas

3.63.8 A Conservation Area is an area considered to be of ‘special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance’. There are 34 Conservation Areas in the city covering around 18% of the city’s built up area.⁶¹

Table 18: Conservation Areas

The Avenues	Kemp Town	Regency Square
Benfield Barn	Montpelier & Clifton Hill	Rottingdean
Brunswick Town	North Laine	Round Hill
Carlton Hill	Old Hove	Sackville Gardens
Cliftonville	Old Town	Stanmer
College	Ovingdean	Tongdean
Denmark Villas	Patcham	Valley Gardens
The Drive	Pembroke & Princes	Woodland Drive
East Cliff	Portslade Old Village	West Hill
The Engineerium	Preston Park	Willetts Estate
Hangleton	Preston Village	
Hove Station	Queen’s Park	

3.63.9 According to the Historic England register, six of the city’s Conservation Areas are currently at risk:

- Benfield Barn
- East Cliff

⁶¹ [BH Conservation Strategy 2015](#)

- Queens Park
- Sackville Gardens
- Stanmer
- Valley Gardens

3.63.10 The Stanmer Conservation Area falls under responsibility of the South Downs National Park Authority.

3.63.11 All except three Conservation Areas currently have a Character Statement. In 2014/15 the number of conservation areas de-designated, or parts of conservation areas de-designated, as a result of the loss of historic and architectural detail was zero. This has stayed the same since monitoring of this indicator began in 2009/2010. In 2014/15 the percentage of conservation areas where the loss of historic or architectural detail is considered to be a 'significant' or 'very significant' problem was 11.8%. This has reduced from the 33% baseline figure in 2010/2011.⁶²

Historic Parks & Gardens

3.63.12 These are designated landscapes considered to be of national importance. There are six Grade II listed historic Parks and Gardens within Brighton & Hove.

- Preston Manor & Preston Park
- The Royal Pavilion
- Wood Vale Cemetery
- Kemp Town Enclosures
- Queens Park
- Stanmer Park

3.63.13 Of these, the Stanmer Park Historic Park & Garden is designated at risk.

Local List

3.63.14 A revised Local List of Heritage Assets was published in 2015.⁶³ This is a list of buildings, parks and gardens considered to be of special interest, because of their local historic, architectural, design or townscape value. This list was published following a call for public nominations.

3.63.15 The list contains around 400 assets, which includes buildings, structures and parks and gardens, as well as two themes covering letterboxes and street lights. The special interest of the asset needs to be taken into account if affected by a planning application.

Archaeology

Scheduled Monuments

3.63.16 Scheduled Monuments are nationally important archaeological sites, designated by Historic England. There are 16 nationally designated Scheduled Monuments (SM) within Brighton and Hove (including those that

⁶² [Authority Monitoring Reports, 2010/11 –2014/2015](#)

⁶³ [BH Local List 2015](#)

fall within the South Downs National Park). In addition there are 12 SMs on land owned by the council outside of Brighton and Hove. Those within Brighton & Hove are:

- Old Manor House, Portslade
- Port's Road and barrow, Round Hill, Hangleton
- Castle Hill earthworks
- Earthworks and lynchetts, Eastwick Barn, Patcham
- Ewe Bottom, Patcham
- Whitehawk Camp
- Long barrow, Beacon Hill
- Saucer Barrow and bowl barrows, Tegdown Hill
- Bowl barrow, Great Wood
- Hollingbury Hillfort
- Long Barrow, Beacon Hill
- Bowl barrows and barrow field, The Bostle
- Dovecote, Patcham Court Farm
- Bowl barrow, Pudding Bag Wood
- Cross Dyke, Great Wood, Stanmer Park
- Medieval Settlement, Stanmer

3.63.17 Hollingbury Hillfort and Whitehawk Camp are considered to be of international importance. None of the Scheduled Monuments are at considered to be at risk.

Archaeological Notification Areas (ANA)

3.63.18 There are over 80 Archaeological Notification Areas (ANA) in Brighton and Hove. These are sites that have been compiled by the County Archaeologist as part of the Historic Environment Record. These areas are judged to have county and city wide importance and are known to have archaeological remains or features

Townscape & Landscape

3.63.19 Brighton and 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. The city sits over upper and middle chalk formations creating a smooth rolling relief. The broad rounded ridges and sweeping dry chalk valleys extend into the city. These ridgelines bring a mosaic of woodland and grassland into the urban environment creating a distinct setting for the city between rolling downland and the sea. The topography, developments in transport, and Brighton & Hove's historical legacy of a seaside resort, have all shaped its urban landscape and influenced the patterns of settlement that we see today. The landscape of the city can be broken down into four distinct landscape character types:

1. Urban Coastal
2. Urban
3. Suburban Downland Fringe
4. Downland Settlements

Nb: It is noted that Downland Settlements, such as Stanmer Village are within the South Downs National Park.

3.63.20 The Urban Characterisation Study describes 13 different townscape types ranging from 20th century suburb to historic core, each with their own character.

South Downs National Park

3.63.21 The order to confirm the designation of the South Downs National Park was confirmed in 2009 and came into effect in 2010. The SDNP is recognised as a nationally important area with outstanding natural beauty and rich cultural heritage. National Park designation confers the highest status of protection as far as landscape and scenic beauty are concerned.

3.63.22 Approximately 40% of the total administrative area of Brighton & Hove falls within the National Park including Tenant Hill, Saltdean, the cliffs east of the Marina, Stanmer Park, Falmer Hill, Wild Park, Hollingbury Hill, Coney Hill, Foredown Ridge, the area stretching east from the eastern side of Sheepcote Valley and south from Woodingdean to include Red Hill and Mount Pleasant along with Roedean School and St Dunstons right down to the coast.

3.63.23 The elevated nature of the Downs provides extensive views over areas beyond the defined National Park boundary.

3.63.24 The South Downs Integrated Landscape Character Assessment was produced in 2011 and identified various different landscape types within the National Park. This includes the “Open Downs” typology⁶⁴ within which most of the Brighton & Hove part of the SDNP falls. The section within the Adur to Ouse area is described as a vast open rolling upland chalk landscape with extensive branching dry valley systems. It contains significant areas of unimproved chalk grassland and occasional scrub and woodland which adds to its biodiversity value. There are large open skies and a strong sense of remoteness and tranquillity in existence close to the urban edge. It has good public access.

3.63.25 The character area has been influenced by urban features such as roads, traffic, built development, electricity pylons and golf courses. It is particularly sensitive visually due to its open nature and is also sensitive to increased recreational pressures, loss of tranquillity and remoteness due to its proximity to adjacent urban areas.

3.63.26 The SDNP has recently been designated a Dark Skies Reserve. These are designated if they meet standards for night sky quality and natural darkness in a core area, with a peripheral area that supports preserving the dark sky at the core. The Reserve recognises the quality of the night-time sky. This means that the darkness of the skies above the SDNP will be protected and that restrictions on lighting will be in place in order to prevent light pollution

⁶⁴ [Open Downland Landscape Typology](#)

from affecting the quality of the sky at night. The SDNPA will seek to protect the skies above the park as well as the landscape on the ground. An exercise to map the darkness of the sky was carried out across the SDNP to support the bid.⁶⁵ The exercise highlights there are areas of the SDNP within Brighton & Hove that already suffer from light pollution, including the Red Hill, Beacon Hill and Mount Pleasant areas between Whitehawk, Ovingdean and Rottingdean; the area to the east of Woodingdean; the area around Sussex University campus; and the area around the A23.

Open Space

3.63.27 Open space includes green space of a more natural form, as well as areas such as outdoor sports space and equipped children's play-space. Open space typologies including includes natural and semi-natural areas, parks, outdoor sports areas, play areas, cemeteries, schools grounds, amenity spaces within housing developments and allotments.

3.63.28 Open space can provide a variety of benefits. It can help to improve our health, by contributing to our physical, mental, and emotional well-being, with results from studies undertaken by Natural England⁶⁶ showing a strong link between distance to green space, physical activity and likelihood of obesity. Natural England research also shows that proximity to open space (particularly green open space) has particular health benefits for those who are income deprived.⁶⁷ A number of "healthwalks" are currently delivered in a variety of open spaces throughout the city helping to promote the link between health and open space through walking.

3.63.29 Open space also has an important cultural and recreational role and plays a role in sport, with Brighton & Hove containing facilities of regional importance, such as the Sussex County Cricket Ground. Open space also provides a number of ecosystem services, such as acting as heat sink and helping to cool urban environments, absorbing pollutants, and absorbing water.

Existing Open Space Provision

3.63.30 A study⁶⁸ was undertaken to establish the baseline of existing provision and set open space standards for quantity, quality and accessibility. It carried out an assessment of the various open space typologies: natural/semi-natural, parks & gardens, children's play-space, amenity green-space, outdoor sports-space and allotments. The study found there to be a small shortfall (measured against 2006 population levels) in the children and young people typology, which was compensated by the amount of amenity greenspace in terms of space requirements. It did not identify any surplus open space and demonstrated that the city would need to retain and

⁶⁵ [Dark Skies Reserve map](#)

⁶⁶ Natural England, Our Natural Health Service

⁶⁷ [Natural England, Health and Natural Environments - An evidence based information pack March 2012](#)

⁶⁸ [Open Space Sports and Recreation Study 2008](#)

effectively use all existing (both public and private) open space and create more areas of open space by 2026 in order to meet the predicted increase in population. The following table sets out the amount of provision and the recommended standards.

Table 19: Provision and standards for open space

Typology	Actual amount (hectare / 1,000 pop)	Quantity Standard (hectare / 1,000 pop)	Accessibility Standards
Parks and Gardens	0.92	0.92	15 minute walk time (720m)
Natural Semi-Natural	2.8	2.8	15 minute walk time (720m)
Amenity Greenspace	0.59	0.582	10 minute walk time (480m)
Allotments	0.23	0.23	15 minute walk time (720m)
Children & Young People (equipped play)	0.047	0.055	15 minute walk time (720m)
Outdoor Sports	0.47	0.47	20 minute walk time (960m)

3.63.31 The study also assessed provision of indoor sports facilities and found that some additional indoor facilities would be needed, including swimming pools, sports hall space, and health & fitness stations and recognised demand for an ice rink.

3.63.32 The Open Space Study was updated in 2011 in order to assess open space at local level (e.g. sub-ward level) against the population levels predicted for 2030. The study endorsed the citywide standards set for open space. In addition, the findings of the study indicate a significant variation in the supply of open space across wards. In general, the majority of wards fell below the standards in at least one of the 6 categories. The two exceptions were East Brighton and Hollingbury & Stanmer which include a significant amount of open space provision that is now situated within the National Park. The findings also indicate that in all categories the provision versus the standard will fall between 2007 and 2030 reflecting the projected increase in population during the period.

Indoor Sports

3.63.33 A Study ⁶⁹ has since assessed demand and provision of indoor facilities across the city and recommended a number of actions in order to address deficiencies:

1. To build a new large multi-sports centre
2. Increase the number of community swimming pools
3. Facilitate the opening of a purpose built gymnastics facility

⁶⁹ [Indoor Sports Facilities Plan \(2012-2022\)](#)

4. Increase levels of community access to existing school facilities
5. Improve the quantity and quality of health and fitness facilities
6. Improve existing athletics facilities including replacement of the track at Withdean
7. Develop Withdean as a multi-sports hub
8. Improve the quality and quantity of artificial grass pitches

3.63.34 The Sports Plan also identified demand for an ice-rink, which at the time the study was written would have been met by the Black Rock proposal, however this has since fallen through.

Food growing

3.63.35 The Open Space Sports and Recreation Study found that there was no overall shortfall (measured against 2006 population levels) in allotment sites, however the study update indicated that there are areas in the city which are currently under-provided for. There are large waiting lists for allotments in some locations in the city. The council recognises the increasing interest in growing food in the city and the Allotment Strategy 2014 seeks to ensure sufficient availability of good quality, accessible land for allotments. A number of initiatives are in place to increase access, including smaller sized Learner Plots for new allotment holders (quarter-sized plots), and “Half-Plots”, whereby plots are shared between two holders. Approximately half the plots in the city are the smaller sized half plots.

3.63.36 There are a total of 3,021 plots across the city, all of which are in current active use. There are a total of 1,265 people on waiting lists, with some people having been on waiting lists for over 5 years.⁷⁰ However it is acknowledged that some people are on waiting lists because they want to swap to a different plot or want an additional plot and some people are on a number of lists, but only want one plot.

3.63.37 The Food Strategy and Action Plan recognises the environmental, health, social and community benefits of growing food and seeks to achieve an increase in space for food growing, and better use of existing allotment plots in the city.

Urban fringe

3.63.38 The urban fringe consists of a number of sites situated between the built up area boundary and the boundary of the South Downs National Park. It consists of 64 separate sites some of which have specific open space functions such as cemeteries, allotments, parks and golf courses, and some of which have functions such as water storage. Many sites fall within the natural/semi-natural typology.

3.63.39 The urban fringe was subject to a high level assessment of constraints and opportunities in 2014 with a view to identify any sites that had potential for housing which could help to address the shortfall between the submission

⁷⁰ <http://www.brighton-hove.gov.uk/content/leisure-and-libraries/parks-and-green-spaces/allotment-availability>

City Plan housing target and the Objectively Assessed Need. The study found the urban fringe to have potential to deliver an estimated 1,180 dwellings across 39 sites.⁷¹ Further Urban Assessments have been carried out to assess some of the more sensitive sites the results of which will inform Part 2 of the City Plan.

The Seafront

3.63.40 The seafront is an important recreational and leisure destination for both residents and visitors. It is the city's main public space and forms an important opportunity for both formal and informal recreation. It is also the location of exceptional groups of historic buildings and includes sites of nature conservation interest. Some of the areas of open space located along the seafront were included in the Open Space Assessments, such as Hove Lagoon, Hove Lawns and the various children's playgrounds where they could be defined as a clear open space typology. The actual single beach area was not included in the assessment although it is recognised that the beach area itself forms an important part of the open space provision in the city.

Local Green Space

3.63.41 The NPPF provides communities with a means of protecting local green areas from development as a local green space. This will enable communities, in particular circumstances, to protect areas of land that are of value to them, through local and neighbourhood plans.

3.63.42 There are currently no Local Green Space designations across the city, and this will be explored further through Part 2 of the City Plan.

Future Open Space Requirements

3.63.43 When applying the open space standards to the City Plan housing target of 13,200, an increase of 167 hectares of open space across various typologies will be required to meet future needs.

Losses and Gains in Open Space

3.63.44 The Sustainability Checklist provides one way of monitoring losses or gains in open space resulting from new build residential development, however only provides data for applications that submit a sustainability checklist and does not monitor actual implementation (e.g. whether schemes deliver what they say they will). In the 2014/2015 monitoring period residential completions resulted in a net additional 1,945m² of open space.⁷²

⁷¹ [Urban Fringe Assessment \(2014\)](#)

⁷² [AMR 2014/2015](#)

3.64 LIKELY FUTURE BASELINE

- 3.64.1 Heritage assets can be adversely affected by new development, however restrictions imposed by heritage designations together with planning controls help to protect from or mitigate any harm. Permitted development rights are likely to continue to pose a risk to some heritage assets, unless further Article 4 Directions are introduced.
- 3.64.2 The production of Character Statements for the three Conservation Areas currently without one should have a positive impact on the future preservation of those areas.
- 3.64.3 In terms of heritage assets at risk, funding has been secured for Stanmer Park (Conservation Area and Historic Park & Garden) which should help enhance this asset; the Valley Gardens conservation area will benefit from a co-ordinated approach to improvements as set out in the City Plan Part 1; and planning approvals for works to listed buildings such as Marlborough House should help to improve these assets, potentially leading to their removal from the “at risk” register. However, some of the assets at risk are likely to remain so, for example the West Pier, whilst other assets may become at risk in the future through vacancy or neglect.
- 3.64.4 The introduction of a Design Panel should help to address design-based issues, including the impact of design on heritage assets and on local townscape and landscape.
- 3.64.5 The National Park designation offers the highest standard of protection for the designated area. However, increasing traffic, urban development and light pollution may have an impact on the tranquillity and remoteness experienced in the South Downs National Park. The proximity to and views over development on the coastal plain, makes the Open Downs landscape character area especially sensitive visually resulting from changes in the urban area beyond the character area due to their elevated nature. In addition, the National Park is also sensitive to light pollution resulting from adjacent urban areas.
- 3.64.6 The amount of various types of open space and outdoor/indoor sports available per person is likely to decrease as the population increases and provision may become lower than the open space standards. Existing open spaces and facilities will be subject to increased levels of use and pressure, potentially eroding their quality of the offer provided.
- 3.64.7 The demand for allotments is likely to continue to exceed supply.
- 3.64.8 Some of the open space functions provided by some of the urban fringe sites will be lost due to development pressures.

3.65 SUSTAINABILITY ISSUES

3.65.1 The key sustainability issues identified from the context and baseline review are:

- Heritage assets are at risk from vacancy, neglect and decay and there is need to conserve and enhance designated and non-designated heritage assets.
- Pressure from new development not in keeping with the special character of the area may pose a risk to designated areas.
- There is a need to accommodate change and growth whilst sustaining and enhancing the significance of heritage assets.
- The elevated nature of the Downs provides extensive views over areas beyond the defined National Park boundary. The Downs are therefore visually sensitive due to this elevated nature. Development outside the SDNP should not adversely affect the character of the National Park and its landscape types.
- The Nature Improvement Area, or similar landscape scale approach should be retained and enhanced in order to help deliver net gains in biodiversity.
- The open space needs of the future population cannot be met by existing provision with an additional 167 hectares required by 2030. Additional provision, and improvements to existing provision will be required, particularly in some areas of the city that are currently deficient.
- The outdoor sports needs of the future population cannot be met by existing provision, with an additional 15.5 hectares required by 2030.
- Some open space provision should be retained on sites wherever possible, particularly on greenfield sites that currently provide an open space use.
- Allotment provision varies across the city and waiting lists are in existence for all sites.

3.66 DATA LIMITATIONS

3.66.1 The Sustainability Checklist allows some monitoring of gains and losses in open space to take place, however this is not fully comprehensive and only applies to residential development which submits a completed Sustainability Checklist. There is insufficient data from the Checklist to allow trends to be analysed.

3.67 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.67.1 The following SA Objective and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	<ul style="list-style-type: none"> • Protect, conserve and enhance listed buildings, historic parks & gardens, conservation areas and scheduled ancient monuments and their settings. • Take account of assets on the Local List • Recognise the potential for undesignated archaeological assets and the local list of assets. • Support the integration of new development into the built and historic environment • Respect, maintain and strengthen local character and distinctiveness • Promote high quality design that establishes a strong sense of place • Take into account the existing character of adjacent communities and neighbourhoods.
To protect and improve open space and green infrastructure and improve sustainable access to it.	<ul style="list-style-type: none"> • Contribute to meeting the city's open space, sports and recreation requirements • Improve the quality or make better use of existing open space • Replace existing open space with improved quality or quantity • Improve sustainable access to existing or new open space • Increase opportunities for use of open spaces, including the seafront • Protect and enhance public rights of way • Encourage the incorporation/creation of various types of open space within development
To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	<ul style="list-style-type: none"> • Protect the landscape character and special characteristics of the SDNP and its setting • Protect and enhance important views to and from the SDNP • Encourage sustainable access to the SDNP • Promote sustainable tourism to the SDNP • Limit the impact of light pollution on the SDNP • Protect and enhance public rights of way

Sites

3.67.2 The following SA Objectives and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Site seeks to protect and/or enhance designated heritage assets and/or their settings, and/or is likely to improve a designated heritage asset at risk.
	+	Site seeks to protect or enhance a locally listed asset and/or its setting.
	0	Site is not within, adjacent to or within the setting of any designated heritage assets. Site has no known archaeological potential.
	-	Site is within or adjacent to a locally listed asset and could result in the partial loss of or harm to the asset. Site has known archaeological potential.
	--	Site is within or adjacent to or contains a Scheduled Monument, Historic Park & Garden, Listed Building or Conservation Area and may result in partial loss or harm to one or more of these heritage assets and/or their settings
To protect and improve open space and green infrastructure and improve sustainable access to it.	++	Site offers potential to result in an increase in public open space/green infrastructure. Site meets accessibility standards for 2 or more types of existing open space.
	+	Site offers potential to result in an improvement to existing open space/green infrastructure. Site meets accessibility standards for at least 1 type of open space.
	0	Site will not result in either an increase or improvements to existing open space, nor loss.
	-	Site will result in loss of privately owned open space which is not publically accessible. Site does not meet accessibility standards for any types of open space.
	--	Site will result in loss of publically accessible open space, or privately owned open space which is publically accessible. Site does not meet accessibility standards for any types of open space.
To protect, conserve and enhance the South Downs	++	Main use of the site is to improve sustainable access to the SDNP.

National Park and its setting, and improve sustainable access to it.	+	Site is adjacent to, or within setting of SDNP but landscape qualities are already compromised by urbanising influences (e.g. buildings/roads) and offers potential to improve appearance or access to SDNP.
	0	Site is within core urban area and is not visually prominent from the SDNP.
	-	Site is adjacent to, or within setting of SDNP but landscape qualities are already compromised by urbanising influences (e.g. buildings/roads), and offers no potential to improve appearance or access to SDNP. Or, site is adjacent to, or within setting of SDNP but is screened/obscured by vegetation/topography and will have limited visual impact.
	--	Site is adjacent to, or within setting of SDNP and possesses the same landscape character as the SDNP (e.g. open downland), and site is not screened/obscured by existing vegetation/topography and is therefore visually prominent. Or, site has an important landscape role – e.g. green wedge between city and SDNP.

3.7 Topic 7: Population, Health & Inequalities

3.71 INTRODUCTION

- 3.71.1 Many factors combine together to affect the health of individuals and communities, known as the determinants of health. This includes where we live, the state of our environment, our level of education, income, social networks, our gender as well as an individual's genetic makeup, characteristics and behaviour.
- 3.71.2 Urban planning can positively influence the determinants of health by providing access to good housing, facilities to increase sport and activity, recreation, cultural and community facilities, healthy food, care and health facilities. Good health is a fundamental contributor to quality of life and well-being.
- 3.71.3 Health varies across the city. The Marmot Review into health inequalities concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities'.
- 3.71.4 This topic chapter sets out the baseline and context information relating to population demographics, health and inequalities. The chapter also sets out the sustainability issues and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.72 CONTEXT REVIEW

3.72.1 Key documents reviewed:

- EU Health Strategy
- NPPF (2012)
- Health & Social Care Act (2012)
- The Marmot Review: Implications for Spatial Planning (2011)
- Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010)
- Equality Act (2010)
- BH City Sustainability Action Plan (2015)
- BH Sustainable Community Strategy (2014)
- Strategy to Reduce Health Inequalities in Brighton & Hove (2005)
- BH Joint Strategic Needs Assessments (2013-2015)
- BH Joint Health & Wellbeing Strategy (2015)
- A Food Strategy and Action Plan (2012)
- BH Children & Young People's Plan 2009-2012
- Reducing Inequality Review (2008)

- School's Organisation Plan 2013-2017
- Annual Report of the Director of Public Health (2014/2015)

3.72.2 The key sustainability objectives and messages coming from the context review are to:

- Avoid, prevent or reduce harmful effects on human health
- Reduce health inequalities by taking a coordinated approach to tackling multiple issues such as education, income, housing, welfare, inactivity and crime
- Protect and improve the health of all members of the community, but particularly vulnerable groups
- Promote and provide opportunities for various forms of social interaction and foster good relations between communities
- Provide adequate community, health and social infrastructure to support growth and development
- Provide opportunities for physical activity and recreation
- Provide safe and accessible environments
- Reduce crime and the fear of crime
- Reduce deprivation, particularly in the most deprived areas
- Eliminate unlawful discrimination and advance equality of opportunity, particularly for those with protected characteristics

3.73 CURRENT BASELINE

Population ⁷³

Population Demographics

3.73.1 The city's population is growing. At the time of the 2011 Census the population was 273,369, an increase of 25,552 or 10.2% since the Census 2001. The latest estimate for the city is 281,076.⁷⁴

Gender

3.73.2 At the time of the Census 2011 there was a fairly even split of men and women in the city, with 136,108 males (49.8%) and 137,261 females (51.2%). 48% of the female population are aged between 15-44 and are considered to be of child-bearing age. This is higher than the England average of 40%. However the rate of fertility, measured by number of live births per 1,000 population is much lower than average, at 49.9 births/1,000 compared to 64.2 births/1,000 across England.

Age

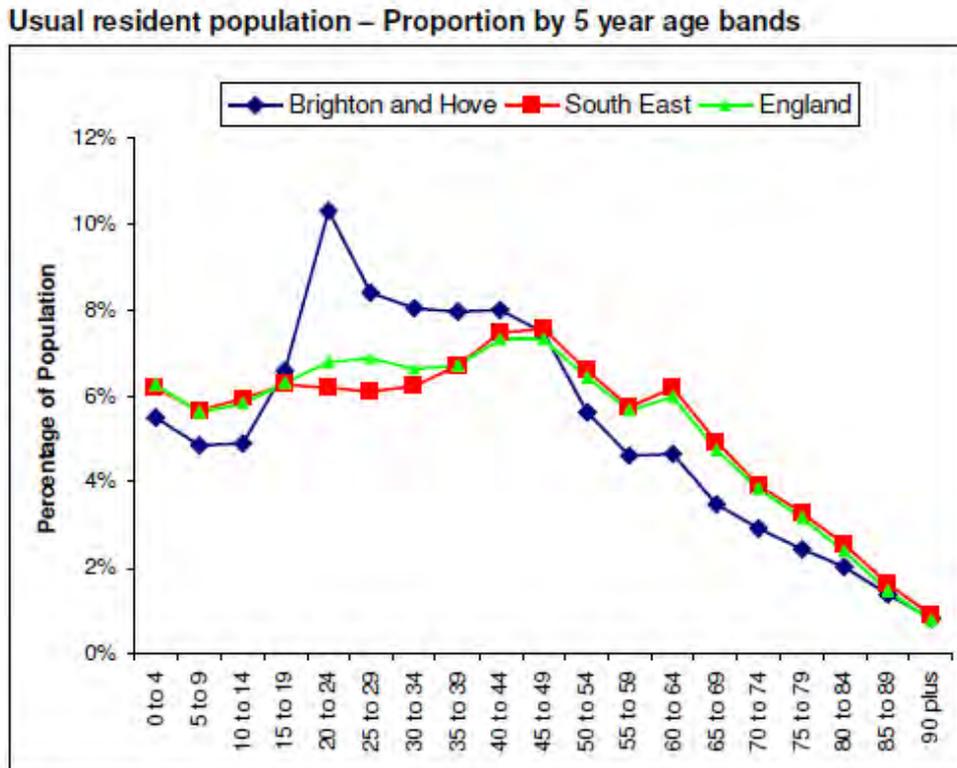
3.73.3 The city has an unusual age distribution compared to both the national and regional profiles. There are fewer children and older residents, but a clear

⁷³ All Census population data taken from [BH Census 2011 Briefing: City Profile](#)

⁷⁴ [ONS Sub-national mid-year estimates 2014](#)

swell in the proportion of adults aged 20-44 as can be seen on the following figure. 48% of the resident population are aged between 16-44, compared to 38% across England; 16% of the population are aged under 16, compared to 19% across England; and 13% of the population are aged over 65 compared to 17% across England.

Figure 9: Population by 5 year age bands



2011 Census data taken from ONS table PP04.

3.73.4 Age profiles also vary by ward. In the Hangleton & Knoll, Wish, South Portslade, North Portslade, Patcham and Woodingdean wards, over 20% of residents are aged 0-15, higher than both the local and English averages. Conversely, there are also wards with very low proportions of young people including Regency, Brunswick & Adelaide, Central Hove, and St Peter’s & North Laine where fewer than 10% of residents are aged 0-15.⁷⁵

3.73.5 Those aged 65+ years are most concentrated in Rottingdean Coastal (22.3 per cent) and Woodingdean (19.3 per cent).

Ethnic Background & In-Migration

3.73.6 At the time of the Census 2011, the majority of residents (80.5%) were of White British ethnic background. This is slightly higher than the England average of 79.8%. This proportion has decreased since the 2001 Census when 88% of residents were of White British ethnic background. Residents of a BME background, including those of Other White background, account for

⁷⁵ [BH Community Insight](#)

19.5% of all residents. This is an increase from the 2001 Census when only 12% of residents identified as BME. The proportion of BME residents is now more similar to the English average which is 20.2%. The largest proportion of BME residents is those of White Other background, accounting for 7.1% of the total population. For one in twelve residents (21,833 or 8.3%) aged 3 years or over English is not their main or preferred language according to 2011 Census data.

3.73.7 At the time of the Census 2011, 16% of the population were born outside the UK. This has increased from 10.8% in 2001. Of these, 32% were born in a European country, 35% were born in the Middle East, 17% were born in Africa and 17% were born elsewhere. According to the 2011 census, 54% of the city's non-UK born residents arrived in the UK between 2001 and 2011 and 30% arrived in the UK between 2007 and 2011.

3.73.8 For 8.3% of residents aged three or over, English is not their first or preferred language. Other than English, Arabic is the most widely spoken language in the city.

3.73.9 It is estimated that there are around 200 asylum seekers in the city at any one time.⁷⁶ Brighton & Hove currently has no designated accommodation for asylum seekers, most asylum seekers in the city will therefore be dependent for accommodation and support on members of their own communities and may seek to live in the city because those communities exist here.

Sexuality and Gender Identity

3.73.10 The best estimate of the number of lesbian, gay and bisexual residents is 11-15 per cent of the population aged over 16.⁷⁷ The estimate draws on information collected via large scale surveys and audits conducted over the last ten years including the Joint Strategic Needs Assessment and the Count Me In Too survey.

3.73.11 At the time of the Census 2011, the proportion of residents in a registered civil partnership was 1%, which is five times higher than the proportion across the South East (0.2%) and England (0.2%). Across the country, only London has a higher proportion of residents in a civil partnership.

3.73.12 It is estimated that there 2,760 trans adults living in Brighton & Hove⁷⁸, representing 1.2% of the population aged over 16 (based on population aged over 16 at the time of the Census 2011).

Health & Disability

3.73.13 At the time of the Census 2011, over 16% of residents stated their day to day activities are limited because of a long term health problem or disability. Of this, 7.5% have a long term health problem that limits their day

⁷⁶ [JSNA 2015](#)

⁷⁷ [City Snapshot of Statistics 2014](#)

⁷⁸ [Equalities in Brighton & Hove: Data snapshot for equalities groups across the city \(OCSI\) 2015](#)

to day activity a lot, and 8.8% have a limiting long term problem or disability that limits their activity a little. Both figures are similar to those found in the South East and in England.

- 3.73.14 In November 2014, 5.1% of the population in Brighton & Hove were receiving Disability Living Allowance (DLA), which is above the South East (4.0%) but slightly below the England average (5.2%). 14.8% of those aged 65 and over were claiming Attendance Allowance (AA) in November 2014 in Brighton & Hove, slightly above England (14.7%) and the South East (12.8%).⁷⁹

Religion

- 3.73.15 At the time of the Census 2011, 42% of the population stated they had no religion. This is a much higher proportion than the England average (25%). Of those with a religious faith, the largest majority are Christian (43% of all people in Brighton & Hove). The next largest religious group are Muslim (2.2% of the population) however this is lower than the England average (5%). There are approximately twice as many people identifying as Buddhist (1%) and Jewish (1%) in Brighton & Hove than across England as a whole (both 0.5%).

Students

- 3.73.16 There is a substantial student population in the city; at the time of the 2011 census full time students aged over 16 accounted for 14.1 per cent of the population living in the city. The average proportion of the population who are students is 7.5 per cent in the South East and 8.2 per cent in England.
- 3.73.17 The highest concentrations of students aged over 16 years are found in Hollingdean & Stanmer (35.5 per cent), Moulsecomb & Bevendean (35.3 per cent), Hanover & Elm Grove (27.4 per cent) and St. Peter's & North Laine (26.1 per cent).
- 3.73.18 The two universities have 34,678 students registered studying full or part-time, with just over a fifth of these originating outside of the UK.⁸⁰
- 3.73.19 The city also hosts a large number of short-stay foreign students attending one of the many language schools in the city.

Health

Life expectancy

- 3.73.20 Life expectancy continues to rise. Across the city for the period 2011-2013, for females it is the same as England (83.1 years); for males it is 7 months less (78.8 years). Healthy Life Expectancy, which is the number of years spent in good health is 64.4 years for women and 62.8 years for men, both

⁷⁹ [Equalities in Brighton & Hove: Data snapshot for equalities groups across the city \(OCSI\) 2015](#)
⁸⁰ [City Snapshot of Statistics 2014](#)

of which are under state retirement age.⁸¹ The following table shows the increasing trend of life expectancy.

Table 20: Life expectancy

Years	Males		Females	
	Brighton & Hove	England	Brighton & Hove	England
2011-2013	78.8	79.4	83.1	83.1
2010-2012	78.7	79.2	83.0	83.0
2009-2011	78.5	78.9	82.6	82.9
2007-2009	77.1	76.9	82.5	81.1

3.73.21 Mortality rates for the most common causes of death are higher in the city than in the region. The main causes of death in 2012 were cancer (31 per cent), followed by circulatory conditions (27 per cent), and respiratory conditions 12 per cent). One in twenty deaths in the city were not caused by disease – these are predominantly accidents or suicide.⁸²

Key Health Issues

3.73.22 The following health-related behaviours are those which particularly contribute to early mortality or poor health in Brighton & Hove: alcohol consumption, weight and inactivity, domestic & sexual violence, emotional health & wellbeing, smoking and prevalence of a disability. The following specific health problems are issues locally: cancer, HIV/AIDs, diabetes, coronary heart disease, dementia and muscular-skeletal conditions.⁸³ Main causes of mortality in the city are cancers, circulatory diseases, respiratory diseases and digestive diseases (including liver diseases).⁸⁴

3.73.23 As stated above, at the time of the Census 2011, over 16% of residents stated their day to day activities are limited because of a long term health problem or disability. Of this, 7.5% have a long term health problem that limits their day to day activity a lot, and 8.8% have a limiting long term problem or disability that limits their activity a little. Both figures are similar to those found in the South East and in England.

Child health

3.73.24 In Year 6, 13.3% of children were classified as obese, better than the average for England (19.1%). The rate of alcohol specific hospital stays among those under 18 was 63.1/100,000 population, worse than the average for England (40.1/100,000). Levels of GCSE attainment are worse than the England average (53.6% compared to 53.8% achieving 5 GCSEs including maths and English). Levels of breastfeeding and smoking at time

⁸¹ [Annual Report for the Director of Public Health 2014-2015](#)

⁸² [City Snapshot of Statistics 2014](#)

⁸³ [JSNA 2015](#)

⁸⁴ [JSNA 2015](#)

of delivery are better than the England average.⁸⁵ Child poverty is lower than the England average, however varies widely across the city.

Adult health

3.73.25 In 2012, 12.8% of adults are classified as obese, better than the average for England of 23%. The rate of alcohol related harm hospital stays was 645/100,000 population, the same as the English average. The rate of self-harm hospital stays was 355.2/100,000 population, worse than the average for England (203/100,000 population). The rate of smoking related deaths was 324/100,000 population, worse than the average for England 288/100,000 population. Estimated levels of adult smoking are also worse than the England average however trends suggest levels of smoking are decreasing. Estimated levels of adult excess weight and physical activity are better than the England average although are showing trends of increasing. Rates of sexually transmitted infections and people killed and seriously injured on roads are worse than average.⁸⁶

Health infrastructure

3.73.26 The Royal Sussex County Hospital, the regional hospital for the area, is located in Brighton & Hove and is undergoing significant expansion, which will include a helipad so that all trauma cases from across Sussex can be supported. The hospital provides general, specialist and tertiary services, including Cancer Services (Sussex Cancer Centre), Cardiac Surgery, Maternity Services, Renal Services, Intensive Care for Adults and Intensive Care for new born babies. The hospital also provides A&E services.

3.73.27 Millview Hospital in Hove provides specialist services including mental health, HIV services, and substance misuse support.

3.73.28 Brighton General Hospital provides specialist services including plastic surgery, dermatology, colorectal and head and neck cancer services, older people's services and community mental health services.

3.73.29 There are 51 GP practices located throughout the city, including a walk-in centre at Brighton Station for same day access to a GP. There are 49 dentists across the city, some of which provide NHS treatment.⁸⁷

Deprivation

Index for Multiple Deprivation

3.73.30 There are a range of indicators that have been developed to assist in assessing and comparing 'deprivation', or poverty, at local, regional or national level. The most up to date Index of Multiple Deprivation is the IMD 2015. The indices of deprivation are made up of seven "domains" of deprivation. These are Income Deprivation, Employment Deprivation,

⁸⁵ [Health Profile Brighton & Hove 2015 \(Public Health Observatories\)](#)

⁸⁶ [Health Profile Brighton & Hove 2015 \(Public Health Observatories\)](#)

⁸⁷ [BHCC website map search](#)

Health Deprivation and Disability, Education, Skills and training Deprivation, Crime, Barriers to Housing and Services, and Living Environment.

- 3.73.31 In 2015, out of 326 authorities, Brighton & Hove was ranked 102nd most deprived authority in England in 2015, where 1 is most deprived and 326 is least deprived. This means the city is amongst the third (31 per cent) most deprived authorities in England. In 2010 the city was ranked 66th most deprived, meaning the city has become less deprived relative to other authorities. Relative to other authorities, Brighton & Hove has seen the eighth biggest improvement in its IMD ranking in England from 2010 to 2015.⁸⁸
- 3.73.32 Income Deprivation Domain:** Measures the proportion of the population experiencing deprivation relating to low income. Brighton & Hove is ranked 125th most income deprived out of 326 authorities. It is estimated that 38,635 people or 14% of the population are income deprived.
- 3.73.33 Employment Deprivation Domain:** Measures the proportion of the working age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities. Brighton & Hove is ranked 142nd most employment deprived out of 326 authorities. It is estimated that 20,551 people or 15% of the population are employment deprived.
- 3.73.34 Education, Skills and Training Deprivation Domain:** Measures the lack of attainment and skills in the local population. Brighton & Hove is ranked 156th most deprived out of 326 authorities in this domain.
- 3.73.35 Health Deprivation and Disability Domain:** Measures the risk of premature death and the impairment of quality of life through poor physical or mental health. Brighton & Hove is ranked 91st most deprived out of 326 authorities in this domain.
- 3.73.36 Crime Domain:** The Crime Domain measures the risk of personal and material victimisation at local level. Brighton & Hove is ranked 98th most deprived out of 326 authorities in this domain.
- 3.73.37 Barriers to Housing and Services Domain:** Measures the physical and financial accessibility of housing and local services. Brighton & Hove is ranked 73rd most deprived out of 326 authorities in this domain.
- 3.73.38 Living Environment Deprivation Domain:** Measures the quality of the local environment. The indicators fall into two sub-domains. The 'indoors' living environment measures the quality of housing; while the 'outdoors' living environment contains measures of air quality and road traffic accidents. Brighton & Hove is ranked 36th most deprived out of 326 authorities in this domain.

⁸⁸ [All IMD data taken from 2015 IMD Full Briefing](#)

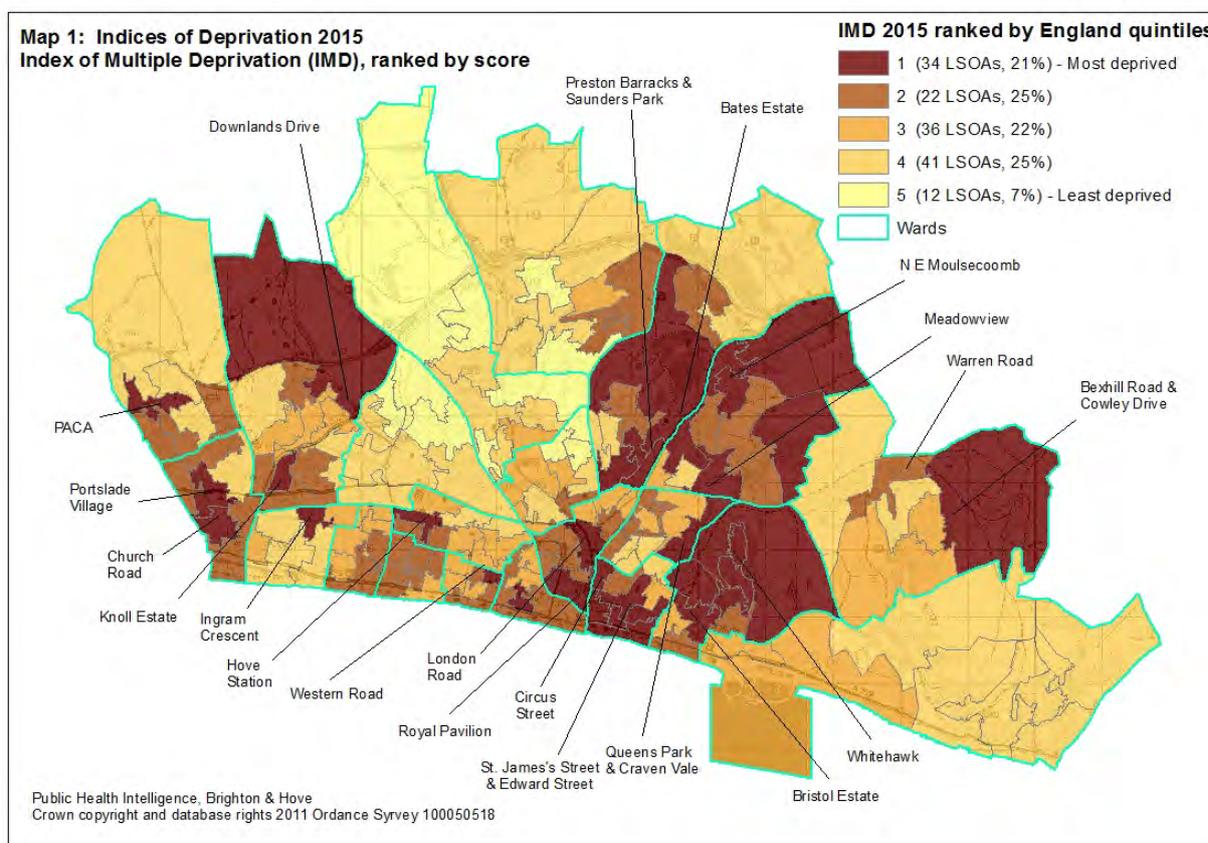
Deprivation across the city

3.73.39 Levels of deprivation vary significantly across different areas of the city. When looking at the IMD at the LSOA level (neighbourhood areas of approximately 1,500 residents) there are 17 neighbourhoods (10 per cent) in the 10 per cent most deprived in England, the same number as were in the 10 per cent most deprived in the 2010 index. Of the 17 neighbourhoods currently in the 10 per cent most deprived, 15 were also in the 10 per cent most deprived in the 2010 index.⁸⁹

3.73.40 The most deprived Brighton & Hove neighbourhood is the northern area of the Whitehawk Estate and is ranked 331 out of 32,482 LSOAs in England. In total five LSOAs in the city are in the 500 most deprived LSOAs in England. Three are located in East Brighton ward and two in Queen's Park ward. In total 34 LSOAs in Brighton & Hove (21 per cent) are in the 20 per cent most deprived areas in England.⁹⁰

3.73.41 The figure below, taken from the "IMD 2015 – Full Briefing" shows the difference in overall deprivation across the city with the darker colour representing areas of higher overall deprivation.

Figure 10: IMD 2015 – All domains



⁸⁹ [All IMD data taken from 2015 IMD Full Briefing](#)

⁹⁰ [All IMD data taken from 2015 IMD Full Briefing](#)

Health Inequalities and Deprivation ⁹¹

3.73.42 Health inequalities and inequalities in life opportunities in general are strongly linked with deprivation.

3.73.43 An individual living in the most deprived areas of the city has an average life expectancy of 6.1 years less for women and 9.4 years less for men. People with a limiting life-long illness or disability are more likely to live in a deprived area, with 26% of people who are disabled or have a limiting illness living in the 20% most deprived areas of the city in 2011. Statistics indicate this trend is increasing. People from deprived areas are 1.8 times more likely to be at risk of major depression. Statistics indicate this trend is decreasing.

3.73.44 Over the 5 year period from 2009-2013, 2,534 deaths in Brighton & Hove can be attributed to deprivation. This is equivalent to 500 deaths a year. This has reduced from over 870 deaths a years from 1988-1992 and shows a general trend for improvements in life expectancy for deprived individuals and a narrowing of the gap between the most deprived and least deprived.

3.73.45 Adverse health behaviours, such as smoking, excessive drinking and poor diet are more prevalent in people who are suffering from deprivation. A deprived individual is 1.7 times more likely to be obese, 2.3 times more likely to smoke, and 1.1 times more likely not to eat five fruit and vegetables a day. There have been improvements in the likelihood of smoking and healthy eating, but an increase in likelihood of obesity since 2003. There is a clear correlation between income, diet and health outcomes, with people on lower incomes 1.5 times more likely to develop diabetes.

3.73.46 There is a greater proportion of children living in poverty in some of the more financially deprived neighbourhoods, such as East Brighton, where 36% of children are living in poverty, and Mouslecoomb and Bevendean, where 37% of children are living in poverty. This compares to 17.5% of children classified as living in poverty across Brighton & Hove in 2012. This is lower than the national average of 19% but higher than the regional average of 14.6%. Major contributing factors to child poverty locally are the high cost of housing and the lower than average wage levels. Child poverty is also more common in ethnic minority groups, Gypsies and Traveller families and families where there are disabilities.

3.73.47 Deprivation also impacts on learning and educational attainment. Only around 20% of children who are in receipt of free school meals achieved 5 or more grade A-C GCSEs in 2013/2014, compared to around 58% of children who don't have free school meals, and compared to the Brighton & Hove average of around 51%. Around 30% of disadvantaged pupils achieved 5 GCSEs compared to around 62% achieving 5 GCSEs who weren't disadvantaged. The likelihood of a pupil not in receipt of free school meals achieving 5 GCSEs had fallen from being 2.9 times more likely to achieve

⁹¹ All health Inequalities and Deprivation statistics taken from [Annual Report of the Director of Public Health 2014/2015](#) unless otherwise stated

this level in 2005/06 to 2.2 times more likely in 2012/13, suggesting a long term improvement in narrowing this gap. However in 2013/2014 this rose again to 2.7 times more likely to achieve this level.

3.73.48 Deprivation also impacts upon employment opportunities, with a greater proportion of people living in the most deprived areas claiming Jobseekers Allowance than those who live in more affluent areas. In 2000, an individual living in one of the most deprived areas was 7.6 times more likely to receive an employment benefit than someone living in the least deprived area; by 2014 this had increased to 33 times more likely. Certain groups are also more likely to experience higher levels of worklessness regardless of where they live, including older people, women, Black Caribbean, Black African and Pakistani ethnic groups, the low-skilled, homeless, ex-offenders and substance misusers.

3.73.49 Deprived areas and areas with low levels of social capital, such as community buildings and local community associations, are more vulnerable to anti-social behaviour. Areas which suffer from income deprivation are associated with increased levels of burglary, robbery, violence, vehicle crime and criminal damage. An individual living in a deprived area is 5.1 times more likely to be a victim of anti-social behaviour than an individual living in the least deprived area.

3.73.50 According to 2013 estimates, 11.9% of households (14,863 households) in Brighton & Hove are fuel poor; a rise of 1.2% from 2012. This is higher than both England (10.4%) and the South East (8.1%). In the Brighton & Hove Health Counts Survey 2012, 16% of respondents said they could not keep their home warm enough in the winter 'quite often' or 'most of the time'. Excess winter deaths are almost three times higher in the coldest quarter of housing than in the warmest quarter, with the World Health Organisation estimating 40% of all these deaths being attributable to inadequate housing.⁹²

3.73.51 Nationally, more deprived people generally have less access to open space. In Brighton & Hove, the geographic availability of green/open space does not reflect deprivation levels, with the more deprived wards faring well in terms of availability. Despite the availability, participation levels gathered from the Health Counts 2012 survey showed that a deprived person was 1.2 times more likely not to use a park or open space at least once a week.

Protected Characteristics⁹³

3.73.52 The Equalities in Brighton & Hove: Data snapshot for equalities groups across the city (2015) report looked at outcomes for groups of people with

⁹² BHCC Public Health team

⁹³ All information taken from Equalities in Brighton & Hove: [Data snapshot for equalities groups across the city \(2015\)](#)

protected characteristics. The following summarises some of the findings of the report.

3.73.53 Gender

- Girls routinely outperform boys in education.
- Women occupy 77% of administration and secretarial posts, but only 6% of engineering places, and make up just 14% of architects, planners and surveyors.
- Unemployment and long-term unemployment rates are higher amongst males but there is a higher rate of economic inactivity amongst women.
- Women aged 40 earn on average 27% less than men of the same age
- Three times as many men as women commit suicide, and rates are particularly high for younger men aged 25-44.
- More women than men report that their daily activities are limited by a health issue.

3.73.54 Gender Identity:

Trans people are more likely to:

- Suffer from bullying in school
- Have a limiting long-term illness or disability
- To be of younger age-range
- Suffer periods of homelessness
- Live in the private rented sector
- Walk and cycle than use public transport

3.73.55 Age

- People aged between 16-24 are less likely to be in employment
- People aged over 65 are more likely to have a limiting illness or disability
- A high proportion of older people (over 85) have no access to a vehicle
- The proportion of older people receiving Pension Credit is higher than the national average

3.73.56 Ethnicity

- A higher proportion of people from white ethnic groups than non-white ethnic groups in Brighton & Hove have no qualifications
- People from white ethnic groups have a higher employment rate than people from non-white ethnicities across Brighton & Hove
- A higher proportion of people from white ethnic groups report having their day-to-day activities limited a little or a lot by a long term health problem or disability when compared with people of other ethnicities.
- A higher proportion of people from white ethnic groups in Brighton & Hove own their home when compared with people of other ethnicities
- A higher proportion of people in black and mixed ethnic minority groups live in social housing (26.6% and 25.6% respectively) than for white (14.1%) and Asian (13.6%) ethnic minority groups.
- A much higher proportion of people from black ethnic groups live in overcrowded conditions than people from white groups across the city (31% compared to 16%)

3.73.57 Religion

- A higher proportion of people of Muslim religion are from young age groups compared to people of Christian, Buddhist or Jewish faith, with more than 46% aged under 25 (compared with less than 30% in this age group across these other religions).
- A higher proportion of people of Jewish faith are from older age groups compared with other religious communities with 32% aged 65+
- People of Christian and Jewish faiths have a higher proportion with no qualifications than other faiths.
- Muslim people also have the highest average unemployment rate (5.9%), more than double the average of people of Christian (2.7%) and Jewish (2%) faiths.
- The Jewish population has a higher proportion of people reporting poor health across likely to be attributed to the age profile of this community
- Less than one in three people of Muslim faith live in owner occupied accommodation (30.8%) and private renting is the most common form of tenure for people of Muslim faith (44.7%).
- A higher proportion of people of Muslim religion live in social housing (24.5 %) than across other religious groups.

3.73.58 Sexual Orientation

- Sussex has a higher prevalence of reported sexual orientation hate crime (9.1 per 100,000 people in 2013/14) than across the South East (5.8 per 100,000)

3.73.59 Disability

- A higher proportion of disabled people have no qualifications and a lower proportion have degree level qualifications than non-disabled people across Brighton & Hove
- 28.3% of people whose day to day activities are limited a little or a lot by disability in employment in Brighton & Hove are in semi-routine or routine occupations, compared to 15.6% of non-disabled people. At the other end of the scale, 6.6% of disabled people are in higher managerial occupations, less than half the rate for non-disabled people (12.7%).
- A lower proportion of disabled people in Brighton & Hove own a car than non-disabled people.
- 19% of households that include a disabled person live in relative income poverty (below 60% of median income), compared to 14% of households without a disabled person.
- 37% of people whose activities are limited a lot are social housing tenants compared to 11% of non-disabled people.

Crime

3.73.60 The latest statistics for crime are taken from the ONS "Recorded crime data at Community Safety Partnership / Local Authority level". The following table shows the total number of recorded crimes for the period 2011 to 2015, and the five highest types of crimes recorded.

Table 20: Total recorded crime 2011-2015

12 months ending	December 2011	December 2012	December 2013	December 2014	December 2015 Total and % of total for 2015	
Total Crimes (all)	23809	24005	22386	21693	23372	
All theft	10853	11979	11211	9512	8797	38%
Violence with or without injury	3677	3654	3194	4696	5982	25%
Criminal Damage & Arson	3454	3067	2915	2592	2795	12%
Vehicle Offences	2194	1842	2354	1828	1735	7%
Drug Offences	1354	1180	1009	944	1013	4%

3.73.61 Trends indicate fluctuations over the last five year period, however long term trends do tend to show an overall decrease, with annual totals at levels of over 33,000 in 2005. ⁹⁴

3.73.62 In 2012/2013, the crime rate, measured by number of crimes per 1,000 population was 86 compared to 66 across England and Wales.

3.73.63 Theft continues to be the most recorded type of crime in the city. This includes domestic burglary, non-domestic burglary, shoplifting, bicycle theft and theft from a person. Violence towards a person accounting for around a quarter of all crimes recorded in 2015 is also high. The majority of these crimes are recorded in the Central Brighton area which has the highest density of licensed venues and is the focal point for the night-time economy. ⁹⁵

3.74 LIKELY FUTURE BASELINE

3.74.1 The Office for National Statistics predicts that by 2030 the population will have increased to 310,900). However, this is based on unconstrained growth and the City Plan housing target, which is less than the Objectively Assessed Need for housing is likely to constrain population growth to some degree.

⁹⁴<http://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatcom/munitysafetypartnershiplocalauthoritylevel>

⁹⁵ [Brighton & Hove City Snapshot Report of Statistics 2014](#)

- 3.74.2 ONS predictions suggest that by 2021 there will be an increase in the numbers of 0-15 year olds, a reduction in the number of 30-49 year olds, particularly women, and significant increases in both male and female 50-59 year olds. There are also anticipated to be swells in those aged between 70-74 and those who are over 90.
- 3.74.3 The student population is anticipated to continue to increase, including students from overseas. However, the impact of recent changes to student tuition fees and grants is not yet known. For example, the proportion of UK students staying at home rather than moving to a new city may increase with rising tuition fees.
- 3.74.4 The diversity of the city's population is anticipated to increase, particularly with people who are born in a different country, however recent trends suggest that migration into the city from other countries is likely to increase. Migration to the UK – by those seeking asylum and others – is however unpredictable and dependent on world events and EU economies. The United Nations reports that the Middle East is facing the most serious global refugee crisis since World War II. It is possible in future that households arriving into the UK from the Middle East conflicts may choose to settle in Brighton & Hove, given the existing Arabic speaking populations.
- 3.74.5 Life expectancy is likely to continue to increase and the gap between male and female life expectancy is anticipated to reduce. Reduction in mortality rates of the most deprived individuals should continue, and the gap between life expectancy between the least and most deprived areas should also continue to decrease.
- 3.74.5 The number of residents who have a moderate or severe physical impairment is expected to increase.
- 3.74.6 The proportion of children who are obese are anticipated to decrease, however the proportion of adults who are obese are anticipated to increase. Other health-related lifestyle choices, such as prevalence of smoking is anticipated to decrease, and the number of alcohol related admissions is also anticipated to decrease.
- 3.74.7 Improvements in mortality rates from coronary heart disease are anticipated to improve, however mortality rates from cancers and the rate of diabetes are anticipated to increase.
- 3.74.8 Educational attainment is likely to continue to improve, although it is likely that the gap between those from more deprived backgrounds and those who aren't will still be significant.
- 3.74.9 Growth in the local economy should help to reduce income and employment based deprivation, having associated effects on child poverty and fuel poverty.

3.74.10 Overall relative deprivation should improve, however it is likely that deprivation in the Housing and Living Environment domains will continue to be high, due to the increasing cost of housing, poor quality rented housing and local levels of air pollution.

3.74.11 Incidences of violent from towards a person are likely to remain high in the central Brighton, as this continues to be the focal point for the night time economy.

3.75 SUSTAINABILITY ISSUES

3.75.1 The key sustainability issues identified from the context and baseline review are:

- The social determinants of health, such as education, employment, housing and income have many consequences including affecting health and wellbeing. Inequalities in these social determinants exist across the city, which results in health inequalities such as the variation in life expectancy between different areas of the city. Actions to address the social determinants of health are of equal importance as preventive and treatment health services in ensuring future good health as well as reducing relative deprivation.
- The age structure of the city will need careful consideration as age shifts will have implications for health care needs, housing mix and other social services in the long term, as well as impacting on the workforce.
- There is a need to ensure that the specific future needs and requirements of different members of the population are met. This includes for example, meeting the needs of asylum seekers and refugees, ensuring sufficient school places for an increasing school-age population, ensuring a variety of provision is in place to support the needs of an aging population, particularly those that are very old, and ensuring that housing of a range of types and tenures is available to support the needs of different groups of people.
- Life opportunities can be seriously affected for people depending on their age, disability, ethnicity, gender, religion or belief, sexual orientation, trans status or other characteristic. Actions should be taken to advance equality of opportunity wherever possible.
- Although obesity levels in children and adults are lower than average there needs to be provision of adequate sports, play, green spaces and leisure facilities to encourage the take up of more active lifestyles.
- Public health can be vastly improved by active lifestyles. Walking and cycling as a means of travel are easily accessible ways of increasing activity, however the fear of traffic can prevent people from travelling in this way.

3.76 DATA LIMITATIONS

3.76.1 Some data, including the Health Counts survey and the Census is only conducted every 10 years.

3.76.2 There is often a time-lag in the reporting of health data.

3.76.3 Deprivation is a relative measure, meaning it is not possible to state whether deprivation has reduced in real terms.

3.76.4 It is difficult to accurately measure how many residents are lesbian, gay or bisexual as there is no census of the city where a question about sexual orientation is asked and good practice is to provide respondents to surveys with a choice of whether to state their sexuality. This limits the availability of data and analysis of issues for LGB residents.

3.76.5 There is very little information about number of transgender residents in the city.

3.77 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.77.1 The following SA Objectives and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To improve health and well-being, and reduce inequalities in health.	<ul style="list-style-type: none"> • Encourage and facilitate walking and cycling • Improve access to open space, the countryside, the seafront and other opportunities for physical activity • Improve environmental quality and therefore minimise adverse impacts on health from various forms of pollution • Reduce the likelihood of health inequalities through improvements to the social determinants of health • Improve access to health facilities
To improve community safety, and reduce crime and fear of crime.	<ul style="list-style-type: none"> • Promote design that facilitates greater community interaction • Provide opportunities for greater community interaction • Seek to minimise crime and facilitates improvements in community safety • Seek to improve road safety
To increase equality and social inclusion	<ul style="list-style-type: none"> • Consider the needs of all members of the community, particularly those with protected

	<p>characteristics</p> <ul style="list-style-type: none"> • Improve access to education, life-long learning and training opportunities, especially for people of various protected characteristics or from the most deprived areas. • Contribute towards reducing deprivation • Improve access to employment opportunities • Encourage the development of mixed communities.
--	--

Sites

3.77.2 The following SA Objectives and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To improve health and well-being, and reduce inequalities in health.	++	Services within desirable walking distance (health - <400m ⁹⁶ ; open space <480 to <720m; sports <960m ⁹⁷ ; primary school <1,000m; secondary school <1,500m ⁹⁸ . Excellent opportunities to walk/cycle. Or, will provide any of the above services.
	+	Services within an acceptable walking distance (health – 400-800m; open space 480-720m; sports <960m; primary school 1,000-1,750m; secondary school 1,500-2,500m), Good opportunities to walk/cycle. Or will provide any of the above services.
	0	
	-	Services within Preferred Maximum walking distance (health – 800-1,200m; open space 480-720m; sports <960m; primary school 1,750-2,500m; secondary school 2,500-4,000m). Limited opportunities to walk/cycle. Will not provide any new services.
	--	Services more than Preferred Maximum walking distance (health >1,200m; open space >480->720m; sports >960m; primary school >2,500m; secondary school >4,000m), No opportunities to walk/cycle. Will not provide

⁹⁶ Distances people are willing to walk taken from [Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000](#).

⁹⁷ Distances for open space and sports taken from [Open Space, Sports and Recreation Study 2008](#)

Accessibility Standards

⁹⁸ Distances to school based on “statutory walking distances” set in Government Statutory Guidance and from [Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000](#).

		any new services.
To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible currently by range of different transport modes. Site provides opportunity for increasing community interaction. Potential site use will support a wide or diverse range of uses. Site located in >40% deprived SOA – crime domain.
	+	Site is safely and easily accessible by limited number of transport modes. Some opportunity for increasing community interaction. Site located within 20-40% most deprived SOA – crime domain.
	0	
	-	Some access issues, possible to overcome. Limited opportunities for increasing community interaction. Site unlikely to support a range of uses and potential uses may increase the likelihood of crime. Site located within 10-20% most deprived SOA – crime domain.
	--	Significant access issues, unlikely to be overcome. No opportunity for increasing community interaction. Site located within 10% most deprived SOA crime domain or a known crime hotspot and potential use of site may increase likelihood of crime.
To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing (15 or more dwellings) Potential to deliver housing for people with protected characteristics or particular communities. Site located within 20% most deprived SOA (employment domain) and could offer employment/skills opportunities.
	+	Site has potential to deliver 20%-30% affordable housing (5-14 dwellings). Site located in close proximity to 20% most deprived SOA (employment domain) and has potential to deliver jobs/skills.
	0	
	-	Site unlikely to deliver any affordable housing or housing for people with protected characteristics. Site unlikely to provide opportunities to reduce deprivation.
	--	Site could encourage social exclusion/isolation through access issues, and/or would provide employment in an un-accessible location. Site unlikely to provide opportunities to reduce deprivation.

3.8 Topic 8: Housing & Community

3.81 INTRODUCTION

3.81.1 Housing is a key component in the development of sustainable communities and is one of the wider determinants of health. It is important to ensure sufficient housing is available to meet identified needs in terms of quantity, location, quality, affordability and choice.

3.81.2 The City Plan Part 1 sets a housing target of 13,200 new dwellings to be delivered over the 2010-2030 period, equating to an average annual target of 660 dwellings. The majority (87%) of dwellings will take place on Previously Developed Land. The City Plan Part 1 identifies that approximately 45% of the new housing will be delivered through Strategic Allocations.

3.81.3 The housing target is less than the identified Objectively Assessed Need which identified that 30,120 dwellings would be required to meet the housing need by 2030. This significant shortfall between the identified need and housing target means that there is a requirement for ongoing discussions under the Duty to Cooperate.

3.81.4 A wide range of community infrastructure is required to support a population's various needs. This varies from critical health or other infrastructure, such as ambulance stations, GP surgeries and schools, to services which support and foster sustainable communities, such as community centres and buildings.

3.81.5 This topic chapter sets out the baseline and context information relating to housing and community facilities. The chapter also sets out the sustainability issues and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.82 CONTEXT REVIEW

3.82.1 Key documents reviewed:

- NPPF (2012)
- Housing & Planning Bill (2016)
- Planning Policy for Traveller Sites (CLG, 2012)
- BH Housing Strategy (2015)
- Homelessness Strategy (2014-2019)
- Traveller Commissioning Strategy (2012)
- Sustainable Community Strategy (2014)
- Objectively Assessed Need for Housing (2015)
- Urban Fringe Assessments (2014 and 2015)

3.82.2 The key sustainability objectives and messages coming from the context review are to:

- To improve housing supply and deliver a mix of housing to meet local housing needs
- To improve housing quality so that residents are able to live in decent homes suitable for their needs
- To consider the housing needs of different communities particularly vulnerable communities
- Provide affordable housing to help meet identified needs
- Ensure that the accommodation needs of Gypsies & Travellers are met
- Support the creation of a mixed and balanced housing market
- Support the creation of mixed and balanced communities with opportunities for social interaction

3.83 CURRENT BASELINE

Housing⁹⁹

Households

3.83.1 At the time of the Census 2011 there were 126,827 actual household spaces across the city an increase in 6.6% since the 2011 Census. Of these, 121,540 (95.8%) have at least one usual resident and are usually occupied.

3.83.2 The average household size is 2.2 people per household and has increased from 2.1 people per household in 2001. This is lower than the regional and England averages of 2.4 people per household.

Housing Types

3.83.3 10.2% of homes in Brighton and Hove are detached which is a much lower proportion compared to the South East and England averages (28.0% and 22.3% respectively). The city also has a comparatively low proportion of semi-detached properties; 19.1% compared to 27.6% in the South East and 30.7% in England.

3.83.4 A quarter of the city's homes are apartments. There are 5,656 more purpose built flats in 2011 compared to 2001. A further 23% of homes are parts of shared houses, or bedsits. These are much higher proportions than in the South East and England as can be seen in the following table.

⁹⁹ All Census Housing data taken from [BH Census Briefing: Housing](#)

Table 21: Housing Types

	2011 Census			2001 Census
	BH %	South East %	England %	BH %
Detached	10.2	28	22.3	10.9
Semi-detached	19.1	27.6	30.7	20.1
Terraced	20.5	22.4	24.5	21.5
Purpose built flat	25	16.1	16.7	21.9
Part of converted house or shared house (inc bedsit)	23.3	4.0	4.3	23.5
Flat in commercial building	2.0	1.1	1.1	1.9

3.83.5 The type of housing that has seen the greatest increase since 2001 is purpose built flats with a 21% increase overall.

Houses in Multiple Occupation

3.83.6 An HMO is a property rented out by at least 3 people who are not from 1 'household' but share facilities like the bathroom and kitchen. Examples include bedsits, shared houses, lodgings, hostels, private halls of residence, accommodation for workers/employees and refugees. It is estimated that there are a total of 6,460 Houses in Multiple Occupation (HMOs) in the city, 1 in 35 of all HMOs in England and Wales which is nine times the national average.¹⁰⁰ HMO's provide vital accommodation for single working people and students. Some areas of the city have become dominated by student occupied HMOs, with some streets having more than 20% student let HMOs.¹⁰¹

Housing Tenures

3.83.7 At the time of the Census 2011, the greatest type of housing tenure was those who owned with a mortgage or a loan (29.9%). This is lower than both the regional and England averages of 35% and 32.8% respectively. The actual number of people who own their home with a mortgage has decreased by over 3,700 since the 2001 Census. 23% of homes are owned outright, which again is lower than the regional and England averages of 32.5% and 30.6% respectively. The actual amount of people who own their homes outright has decreased by over 1,400 since the 2001 Census.

3.83.8 The size of the private rented sector is comparatively high, with 28% of households in private rented accommodated. This is significantly higher than the regional and England averages of 14.7% and 15.4% respectively and has increased from 20% since the 2001 Census.

3.83.9 The number of households renting from the local authority remained fairly static between the 2001 and 2011 censuses with just 149 more households renting from the local authority in 2011, a total of 11,928 representing 9.8% of

¹⁰⁰ [BHCC Housing Strategy 2015](#)

¹⁰¹ [Student Houses and Houses in Multiple Occupation Assessment 2011](#)

all housing types in the city. There has been a greater increase in the number of households renting from a housing association, with 6,259 now renting from this source, an increase of 1,242 households. This represents 5.1% of all housing types compared to 4.4% in 2011.

House Prices

3.83.10 In March 2016, the average price of a property in Brighton & Hove was £301,356. This has increased by 12.1% over a year compared to 6% annual increase nationally and is 10.67 times the average household income (based on average income of £28,240).¹⁰² The average house price across England & Wales in March 2016 was £189,901; in the South East was £266,729 and across East Sussex was £216,612.¹⁰³

3.83.11 The average advertised cost to rent a 1-bedroomed flat in March 2016 was £913, an increase of 2.9% over a 12 month period. The average advertised cost to rent a 3- bedroomed house was £1,500, an increase of 0.7% over the 12 month period. These would represent paying 39% and 64% of gross average annual income on rent.¹⁰⁴

3.83.12 The cost of purchasing housing in Brighton & Hove has increased significantly over the last 15 year period, as shown from the following table. Despite some decreases in cost, reflecting the global economic recession, the cost of purchasing a house is continuing with an upward trend.¹⁰⁵

Table 21: Average cost of buying a home 2001-2015

	2001	2003	2005	2007	2009	2011	2013	2015
Overall average	180,699		220,846	235,700	212,068	219,038	240,948	291,854
1 bedroom flat	104,940	130,625	140,871	179,542	164,750	171,673	184,975	220,448
2 bedroom house	163,839	205,026	207,230	257,803	245,826	258,626	286,128	336,492
3 bedroom house	199,947	256,684	245,670	317,731	309,426	316,078	343,383	411,016

3.83.13 The increasing costs of renting and purchasing a home have implications on affordability. It has been identified that 2,105 affordable dwellings per annum would need to be delivered between 2014 and 2030 in order to meet local housing needs, assuming that households could spend 30% of their income on housing costs.¹⁰⁶

¹⁰² [BHCC Housing Market Report Qtr 1 April 2016](#)

¹⁰³ [Land Registry House Price Index Bulletin April 2016](#)

¹⁰⁴ [BHCC Housing Market Report Qtr 1 April 2016](#)

¹⁰⁵ [Data from BHCC Housing Market Reports 2001-2015](#)

¹⁰⁶ [Objectively Assessed Need for Housing: Brighton & Hove \(2015\)](#)

Housing Market Area

3.83.14 Brighton & Hove forms part of the Greater Brighton & Coastal West Sussex area, within which there are a two main Housing Market Areas covering Mid Sussex, and covering the coastal strip including Lewes, Brighton & Hove, Shoreham, Worthing and Chichester.

3.83.15 Migration flows indicate that within the Greater Brighton Housing Market Area, Brighton & Hove is initially the main area that people move to, but then people migrate out to other areas within the HMA. These patterns of migration are likely to relate to affordability of housing, and the need for different types of housing to meet changing personal circumstances. Evidence suggests that 80% of people migrating from Brighton & Hove to within the HMA are of working age and continue to commute back into Brighton & Hove for employment.¹⁰⁷

Housing Demand

3.83.16 The 2015 Objectively Assessed Need for Housing concluded that the need for housing over the period 2011-2031 would be 30,120 new dwellings. The City Plan Part 1 includes an adopted housing target of 13,200 for the same period, representing a shortfall of 16,920 dwellings. The geographical constraints of the city contribute significantly to this shortfall and it is acknowledged that to achieve the housing target will require high densities on many previously developed sites, as well as development on some of the city's urban fringe sites. Over recent years the OAN has increased from 15,800-19,400 in 2011, to 18,000-24,000 in 2014 to the most recent assessment in 2015 of 30,120. This suggests that the need for housing will continue to increase in the future.

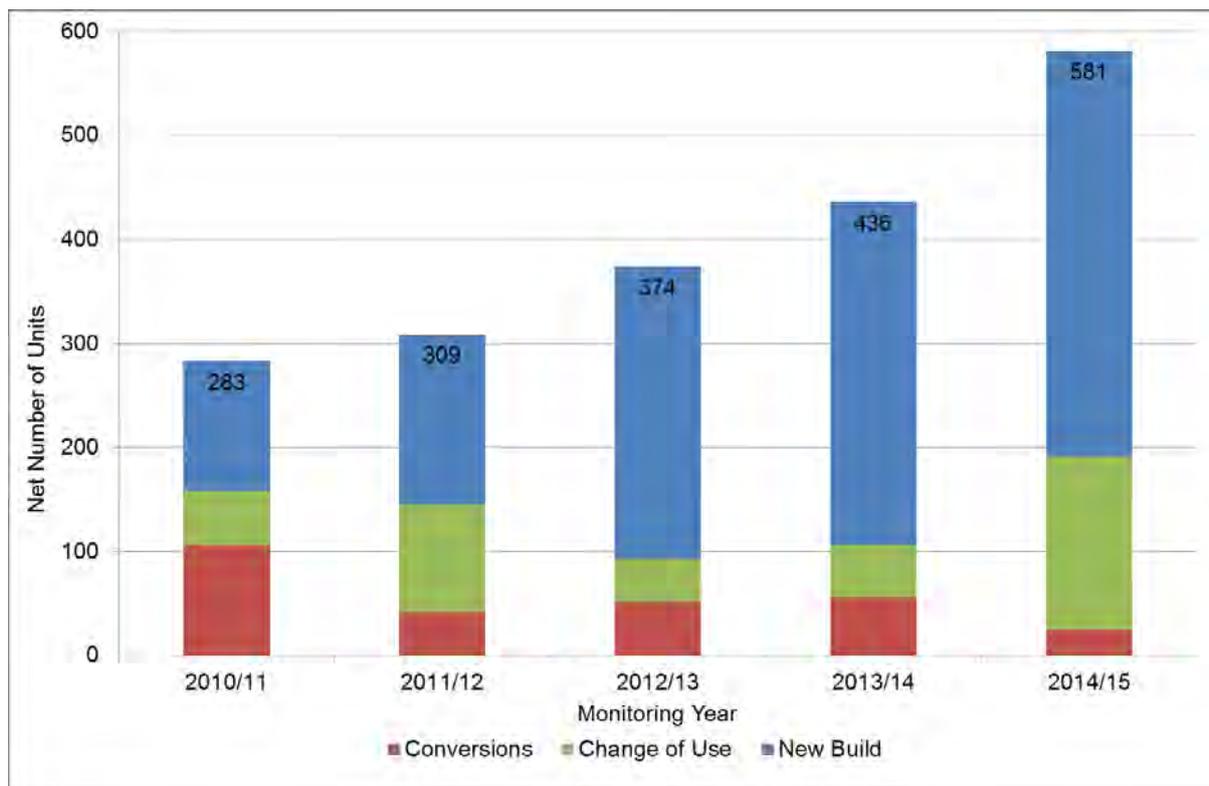
3.83.17 The shortfall will need to be addressed through ongoing discussions with neighbouring authorities and those within the Housing Market Area under the Duty to Cooperate.

Housing completions

3.83.18 There were 581 net housing completions in 2014/15. This figure is an increase of 145 units on the 436 units completed in 2013/14 and continues the upward trend of annual housing completions since 2010/11 as illustrated in the following chart.

¹⁰⁷ [Greater Brighton & Coastal West Sussex Housing Market Background Paper \(2015\)](#)

Figure 11: Net housing completions 2010-2015 ¹⁰⁸

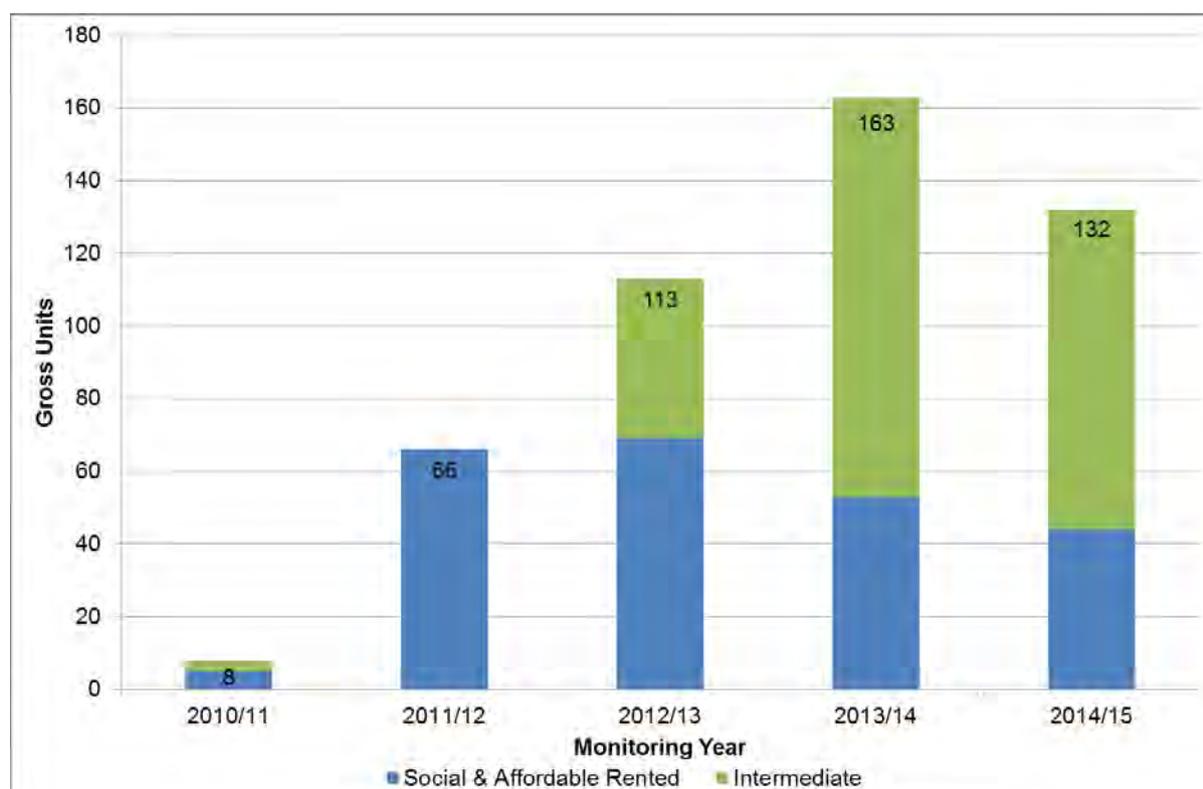


3.83.19 The Housing Trajectory set out in the City Plan Part 1 anticipates how much housing development will be delivered over the plan period. It anticipates achieving 600 units per annum until 2018/2019 and then approximately 950 units per annum during the period 2019-2024.

3.83.20 Of the 581 housing completions in 2014/2015, 132 were affordable. Of these 44 were rented affordable and 88 were intermediate housing. The following illustration shows the amount and proportion of rented affordable and intermediate housing delivered since 2010/11.

¹⁰⁸ [AMR 2014/2015](#)

Figure 12 Affordable housing completions 2010-2015 ¹⁰⁹



Homelessness

3.83.21 There has been an increase in homelessness and rough sleeping in the City.

In the past four years homelessness applications have risen by 50% and those accepted have risen by 40%. The rough sleeper count carried out in December 2014 found 41 sleeping rough on one night however estimates during 2014 ranged between 100 rough sleepers in winter to around 200 at the height of the summer. ¹¹⁰

3.83.22 The following factors have had an impact on this increase as it has been harder for vulnerable households to compete in the housing market: - the recession, the growth in population, the increasing cost of the private housing market, restrictions on mortgage funding which means more people are renting for longer which increases rents.

3.83.23 In 2014/2015 the council dealt with 2,538 households who were in housing crisis and at risk of homelessness. This has decreased from almost 3,000 households in both 2012/13 and 2013/14, but is an increase from 2,452 households in 2011/12 making it difficult to ascertain a short-term trend. Despite the increase in applications increasing in recent years, longer term trends suggest that the number of households accepted as homeless is decreasing. ¹¹¹

¹⁰⁹ [AMR 2014/2015](#)

¹¹⁰ [Housing Strategy 2015](#)

¹¹¹ [BH Housing Statistical Bulletin 2014/2015](#)

Demand for Social Housing

3.83.24 At the beginning of April 2015 there were 21,042 households across all needs on the housing register, an annual increase of 13% and 87% more than in April 2011.¹¹² The general increasing trend is illustrated in the following table.

Table 22: Number of households on the housing register 2011-2015

April 2011	April 2012	April 2013	April 2014	April 2015
11,271	12,782	16,047	18,677	21,042

3.83.25 In April 2014, of the households on the register, 19% had a medical priority, 38% were overcrowded, 6% were homeless and the remaining 31% had no identified need. The proportion of people on the housing register who are seeking social housing for the first time is far greater than those currently in social housing and seeking to transfer (85% compared to 15%). This trend appears to be increasing over time.¹¹³

Housing standards

3.83.26 At the time of the 2011 census 6.7% or 8,168 of Brighton & Hove's households were considered to be overcrowded, based on the measure of having one less bedroom than required. This wasn't measured in the 2001 Census so it is not possible to make a comparison over time. This is higher than the regional and England averages of 3.8% and 4.8% respectively. However, using a different measure of overcrowding which is based on the number of rooms rather than just bedrooms, Brighton & Hove has a much higher rate of overcrowding, at 17.1% of all homes. However, this measure counts bedsits and studio flats as overcrowded even if there is only one occupant, as the measure is based on having a bedroom and another room to live in. On this measure, 12.7% were overcrowded in 2001, which represents a 43% increase in the number of households between the 2001 and 2011 censuses.

3.83.27 The number of households without central heating has more than halved since the 2001 census. 4.4% or 5,406 households do not have central heating. This is still a higher proportion than in the South East, where 2.4% of households don't have central heating and England where 2.7% don't.

3.83.28 The private sector housing team received 1,109 request for support for improvements to homes over 2014/2015 for issue such as damp or disrepair. Of these, only 9 properties received any financial help, due to decreasing government funding available to support improvements. There has been a year on year decrease in the number of properties and amount of money spent on improvements over the last 5 years from 1,478 homes improved at

¹¹² [BH Housing Statistical Bulletin 2014/2015](#)

¹¹³ [BH Housing Statistical Bulletin 2014/2015](#)

a cost of £2,124,000 in 2010/11 to 9 homes improved at a cost of £61,000 in 2014/2015. This decreasing trend is likely to continue.¹¹⁴

3.83.29 The last Private Sector House Condition Survey for Brighton & Hove was completed in 2008. The Survey reported 36,400 dwellings (35%) in the private sector and 930 (15.5%) of Registered Providers dwelling were classified as non-decent.¹¹⁵ At the time of the survey 57% of council owned homes were of non-decent standard. By 2103, improvements carried out meant that 100% of council owned homes met the standards for decency.¹¹⁶

Specific Housing Needs

3.83.30 Different groups of people have specific housing needs. The Housing Strategy 2015 sets out the accommodation needs of certain groups as described below.

Students

3.83.31 The 2011 Census reported a total of 32,294 full-time students aged 16 and above living in the city, representing 14% of the city's population aged 16 and older. The 2011 Census reported that most student households live in the private rented sector with 2,680 student households living in this tenure, representing 93% of the total student households. The universities also have plans to increase student numbers over the next 5 years. There is a need for a wider range of affordable accommodation options for students to reduce the pressure on the existing housing stock.

Families

3.83.32 The 2011 Census reported there were 29,809 households with dependent children living in the city, representing around 25% of the total households. Of these, around 50% had 1 child, 27% had 2 children and 13% had 3 or more children.¹¹⁷ Many families, particularly young families are struggling to buy suitable family accommodation due to the increasing cost of housing. New housing completions in the city show a prevalence for flatted developments, which may not always suit a family's requirements. In addition, there has been a loss of more traditional forms of existing housing stock due to conversions to HMOs.

3.83.33 Over the past 3 years an average of 50% of all households accepted as homeless were households with dependent children and this is the most common single reason for homelessness priority need. Over the past 4 years there has been a significant increase in the number of households with dependent children and/or pregnant women staying in temporary accommodation rising by 335%, from 206 at the end of March 2010 to 897 at the end of March 2014.¹¹⁸

¹¹⁴ [BH Housing Statistical Bulletin 2014/2015](#)

¹¹⁵ [Housing Strategy Statistical Evidence: Family Housing 2015](#)

¹¹⁶ [Housing Strategy 2015](#)

¹¹⁷ [Housing Strategy Statistical Evidence: Family Housing 2015](#)

¹¹⁸ [Housing Strategy Statistical Evidence: Family Housing 2015](#)

Older people

3.83.34 The growing population includes a significant increase in the number of older people with a support need leading to additional demand for long term care services. Many older people and carers living in the city are home owners, some are asset rich but cash poor and have limited disposable income, preventing many from maintaining and heating their homes effectively. Some older people may wish to down-size to more suitable accommodation which would free-up larger property types, however there needs to be suitable housing, such as extra care housing and sheltered housing to which they can move where their needs can be met to enable this to happen.

Gypsy and Traveller Provision

3.83.35 A Gypsy & Traveller Accommodation Needs Assessment (GTAA) was published in 2014 by BHCC & SDNPA.¹¹⁹ The report indicates a need for 32 pitches over the 2013/14 to 2027/28 period for the administrative area of Brighton & Hove. To help meet the need for residential accommodation for Gypsy and Traveller communities a permanent Traveller site at Horsdean started being built in September and is due to be completed in June 2016. This will add 12 permanent pitches alongside the 21 transit pitches already on the site.

Community Infrastructure

3.83.36 Community infrastructure includes a range of different types of services which support the health, education and well-being of residents. Infrastructure includes that for education, health and law and order purposes, for example schools, GP surgeries, fire stations, police stations, hospitals and ambulance stations.

3.83.37 It also includes infrastructure that supports social and vibrant communities, such as pubs, social clubs, night-time venues, bingo halls, meeting places, places of worship, child care centres and sport facilities. Community facilities are essential in providing social interaction and have a role to play in reducing isolation and promoting integration and community cohesion.

3.83.38 As the population increases, the demand on existing community infrastructure and the potentially the need for new infrastructure will also increase.

3.83.39 The City Plan Part 1 sets out some different types of infrastructure that is expected to be delivered by 2030. In addition, the Infrastructure Delivery Plan also sets out different types of infrastructure to be provided.

3.83.40 Additional analysis is likely to be required to determine which additional types of infrastructure will be required to meet the needs of an increasing population.

¹¹⁹ [GTAA 2015](#)

3.84 LIKELY FUTURE BASELINE

- 3.84.1 Demand for housing is likely to increase, with demand exceeding supply. This is likely to result in continued increases in house prices to rent and purchase.
- 3.84.2 The cost of housing, both to purchase and rent is likely to remain a large main part of household expenditure for residents in the city. The cost of buying a home is likely to remain too high for the majority of residents, based on average incomes.
- 3.84.3 The cost of housing in the city is likely to remain above the national and regional averages.
- 3.84.4 The proportion of people who own their own home, either outright or with a mortgage is likely to continue to decrease as the proportion who rent their home continues to increase. The private rented market is likely to continue to be the greatest source of rented accommodation in the city.
- 3.84.5 The proportion of flatted developments is likely to increase, whilst the proportion of detached, semi-detached and terraced housing is likely to decrease.
- 3.84.6 It is considered likely that the amount of housing delivered will increase on an annual basis reaching a peak by around 2024, however this is dependent on wider economic conditions.
- 3.84.7 It is unclear whether the amount of affordable housing delivered across the city will increase on an annual basis due to changes in funding available for affordable housing.
- 3.84.8 Overcrowding, measured by having one less room than required is likely to increase, based on the likelihood that there will be an increase in the proportion of households living in studio flats or bedsits due to increasing housing costs.
- 3.84.9 The amount of private sector households receiving financial help to improve standards is likely to continue to decrease, which may result in an increase in non-decent standard homes in the future.
- 3.84.10 The number of people on the housing register is likely to increase with the proportion of people seeking social housing for the first time increasing.

3.85 SUSTAINABILITY ISSUES

- 3.85.1 The key sustainability issues identified from the context and baseline review are:
- The cost of private rented or privately-owned housing is high in the city, particularly when compared to average incomes.

- The affordable housing need for the city is greater than the total housing target for the period to 2030.
- Increasing housing supply is a key issue for the city, particularly the supply of more affordable housing and housing for those which have specialist needs.
- There is a limited supply of land in the city; the best use of the land availability will be required in order to maximise housing supply.
- There is a need to ensure that various types of community infrastructure are provided in order to meet the various needs of an increasing population and to help support the creation of sustainable and healthy communities.

3.86 DATA LIMITATIONS

3.86.1 Some of the data on housing is taken from the Census. This provides a good picture of how the situation has changed over time, however is now 5 years out of date.

3.87 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.87.1 The following SA Objectives and DMC are proposed to assess emerging policy options:

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To provide housing, including affordable housing, to contribute towards meeting local needs.	<ul style="list-style-type: none"> • Help to boost housing supply and help meet the housing target • Provide a wide mix of housing types, sizes and tenures. • Increase the availability of affordable housing • Address the housing needs for various sections of the community including students, older people, disabled people, families, gypsies and travellers, and smaller households. • Provide decent, high quality housing that can meet changing requirements.
To improve the range, quality and accessibility of services and facilities.	<ul style="list-style-type: none"> • Increase provision of key local services and facilities, such as health, education, cultural, recreation, retail and community facilities. • Ensure the vitality of town, district and local shopping centres

	<ul style="list-style-type: none"> • Improve access to local services. • Enable communities to meet their day-to-day needs locally
--	--

Sites

3.88.2 The following SA Objectives and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site likely to provide >15 dwellings. Wide range/mix of housing likely to be provided, including affordable dwellings. Or, urban fringe site, likely to provide an element of family housing.
	+	Site likely to provide <15 dwellings. Smaller range/mix of housing likely to be delivered than above due to size of site.
	0	Allocated for employment or other use. Not considered suitable for housing.
	-	Net loss of housing stock, although not affordable housing.
	--	Net loss of housing stock, including affordable housing.
To improve the range, quality and accessibility to services and facilities.	++	Site offers good potential to increase/improve a range of local services. Existing services within desirable walking distance (town centre <200m; health <400m ¹²⁰ ; open space <480 to <720m; sports <960m ¹²¹ ; primary school <1,000m; secondary school <1,500m ¹²² . Excellent opportunities to walk/cycle.
	+	Site offers some potential to increase/improve some services. Services within an acceptable walking distance (town centre 200-400m; health 400-800m; open space 480-720m; sports <960m; primary school 1,000-1,750m; secondary school 1,500-2,500m).

¹²⁰ Distances people are willing to walk taken from [Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000](#)

¹²¹ Distances for open space and sports taken from [Open Space, Sports and Recreation Study 2008](#)

Accessibility Standards

¹²² Distances to school based on "statutory walking distances" set in Government Statutory Guidance and from [Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000](#)

		Good opportunities to walk/cycle
	0	
	-	<p>Site does not offer potential to increase/improve services.</p> <p>Services at Preferred Maximum walking distance (town centre 800m; health 1,200m; open space 480-720m; sports 960m; primary school 1,750-2,500m; secondary school 2,500-4,000m).</p> <p>Limited opportunities to walk/cycle.</p>
	--	<p>Site offers no potential to increase/improve services.</p> <p>Services more than Preferred Maximum walking distance (town centre >800m; health >1,200m; open space >480->720m; sports >960m; primary school >2,500m; secondary school >4,000m),</p> <p>No opportunities to walk/cycle</p>

3.9 Topic 9: Local Economy, Employment, Skills and Education

3.91 INTRODUCTION

3.91.1 The performance of the economy is fundamental in the achievement of sustainable development. The economy provides employment and generates wealth but can as a result generate adverse effects such as waste or pollution from industry or traffic. A sustainable economy should be seen as a part of the wider social and natural environment and, as far as possible, not adversely affect these other elements of sustainable development.

3.91.2 Brighton & Hove is an urban area which includes the regional shopping centre, as well as the county hospital which provides sub-regional health facilities, two universities and a thriving tourism sector, all of which contribute significantly to the local economy. The city also includes the largest cluster of creative, digital and IT industries outside London, and has a large proportion of small to medium sized enterprises. The city's functional economic area extends beyond the administrative boundary. The city is closely linked with the surrounding areas of the South East and is part of the Coast to Capital Local Economic Partnership. The Greater Brighton City Deal, agreed in 2014, aims to deliver significant economic growth throughout the region.

3.91.3 The city has a higher than average proportion of adults with skills levels NVQ4 and above, potentially reflecting the high number of students who stay in Brighton after graduating. Attainment at Key Stages 1 and 2 is higher than the national average, and although historically performance at GCSE level has been worse than the England average, this has improved over the last 5 years.

3.91.3 This topic chapter sets out the baseline and context information relating to the local economy, employment, skills and education. The chapter also sets out the sustainability issues and attempts to identify the likely future evolution based on identified trends and accepted future change. At the end of the topic, Sustainability Appraisal Objectives are proposed, in addition to proposed Decision Making Criteria against which the emerging plan will be assessed.

3.92 CONTEXT REVIEW

3.92.1 Key documents reviewed:

- Europe 2020
- The Plan for Growth (2011)
- Fixing the Foundations: Creating a more prosperous nation (2015)

- NPPF (2012)
- Regional Economic Strategy for South East England 2006 – 2016
- Coast to Capital: Strategic Economic Plan (2014)
- Local Strategic Statement for Delivering Sustainable Growth 2015-2031
- Greater Brighton & Coastal West Sussex Background Paper: Economy (2015)
- Economic Strategy 2013-2018 (2013)
- Sustainable Community Strategy (2014)
- City Sustainability Action Plan (2015)
- Creative Industries in Brighton and Hove Report and Strategy (2000)
- City Employment and Skills Plan 2011-2014 (and emerging draft 2016)
- A Refreshed Visitor Strategy 2008-2018
- Schools Organisation Plan 2013-2018

3.92.2 The key sustainability objectives and messages coming from the context review are to:

- Support sustainable and resilient low-carbon economic growth
- Support growth in the digital, creative, information technology and environmental sectors as well as existing sectors
- To provide the infrastructure required to support a growing economy including modern office space
- To provide a year round visitor economy
- To secure the city's conference economy
- To recognise the role of the SDNP in delivering eco-tourism
- To ensure vitality and viability of town centres and recognise their role as the heart of communities
- To reduce unemployment and encourage higher value jobs
- To improve education and skills so that local residents are equipped to enter the labour market
- To provide sufficient school places across the city in locations where they are required
- To reduce the number of people in poverty

3.93 CURRENT BASELINE

Local Economy ¹²³

Recovering from the recession

3.93.1 The UK recently suffered its longest and deepest recession since the 1930s resulting in a 6% loss in output between the end of 2008 and 2009.¹²⁴ The UK economy performed well in 2014, with an overall growth of 2.9% the fastest growth since 2007, however performed less well in 2015 with growth of 2.2%.¹²⁵

3.93.2 The city has proved relatively resilient through the recession and appears to be recovering well. The city has recorded significant jobs growth over the last 15 years and has outperformed regional and national trends.¹²⁶ The Cities Outlook Report indicates that 9,464 jobs were created between 2010-2013 of which 6,200 were in the KNIBS sectors. Knowledge Intensive Business Services sectors include Finance, IT, Health, Business administration & support; and Professional, Scientific and Technical positions. In the same period, approximately 2,279 jobs were created in the CDIT sector. The Creative, Digital and IT sector includes jobs in software development and publishing, arts, advertising, TV and film, print, architecture, design and computer technology. There is some cross over between the KNIBS and CDIT sectors. The CDIT has been highlighted as a strategically important business cluster locally providing future-proofed high value, highly paid jobs. Public administration, education and health remains the highest employment sector representing over one third of employees and financial services remains the second largest employment sector (one fifth of employees), Other important sectors are culture, leisure and tourism.¹²⁷

Earnings

3.93.3 Average gross weekly pay in 2015 for full time employees who live in Brighton & Hove (residential earnings) was £547. This includes those who live and work in Brighton, as well as those who live here but work elsewhere. This is less than the regional average of £575, but more than the UK average of £530. There is a significant gap between male and female earnings, with male full time workers earning £566 per week gross and female full time workers

¹²³ Unless otherwise stated, statistics and data in Local Economy section taken [Local Authority Profile on Nomisweb](#) accessed on 17.05.2015 showing workplace analysis Jan to Dec 2015

¹²⁴ [BHCC City Employment & Skills Plan 2011-2014](#)

¹²⁵ ONS Figures on Gross Domestic Product

¹²⁶ [Employment Land Study Review 2012](#)

¹²⁷ [BH Economic Strategy 2013-2018](#)

earning £517 per week gross, almost 9% less. This pattern is comparable to, although less significant than the regional and national trends, where female workers earn 20% and 17% less than men respectively.

3.93.4 Average gross weekly pay in 2015 for those working in Brighton & Hove (workplace earnings), which includes those who live elsewhere, is less than the above, at £514 and is lower than the regional and national averages of £552 and £529. This reflects the fact that a significant number of people who live in Brighton travel out of the city for higher paid work and reflects lower value jobs locally.

Labour Supply and Economic Activity

3.93.5 In 2014, 70% of the population were of working age (aged 16-64). This is higher than the regional and England averages of 62% and 63% respectively.

3.93.6 In 2015 almost 77% of the working age population were economically active. 71% (of the working age population) were in employment and 6% of the economically active population were unemployed. The remaining 23% of the working age population are economically inactive for reasons such as being a student, looking after home/family, sickness, and retired. 63% of those are economically inactive do not want a job. The following table illustrates the breakdown of economic activity and inactivity.

Table 23: Economic activity and inactivity 2015

	Brighton & Hove	South East	Great Britain
Economically active population	76.6%	80.3%	77.8%
In employment*	71.1%	76.9%	73.6%
% unemployed*	5.8%	4.2%	5.2%
Economically inactive population*	23.4%	19.7%	22.2%
% employees*	57.6%	64.9%	63.1%
% self-employed*	13.7%	11.7%	10.2%
% retired***	9.4%	15.9%	14.1%
% student***	28.2%	25.3%	26.2%
% looking after home/family***	23.8%	26.4%	25.1%
% long term sick/disabled***	24%	18.4%	21.8%
% other***	11.4%	11.1%	10.1%

* shows percentage of Brighton & Hove working age population aged 16-64

*** shows proportion of economically active*

**** shows proportion of economically inactive*

3.93.7 The table shows that Brighton & Hove has a lower than the regional and national average proportion of the population who are working age and economically active, and a higher rate of unemployment amongst the economically active. This could in part be attributed to the higher than average proportion of students in the city. Levels of employment are also lower in the city than across the Coast to Capital and Greater Brighton sub-region (76% and 75% respectively).¹²⁸

3.93.8 The city has a higher than average proportion of working age population who are self-employed. Self-employment is highest among those working in construction, professional, scientific and technical activities. The self-employment rate has increased by 5% since 2009 and is higher than both the rate in the Greater Brighton and Coast to Capital sub-regions.¹²⁹

3.93.9 63% of jobs in the city are full time with the remaining 37% being part time. The proportion of full time jobs is lower than both the regional (68%) and national averages (68%).

3.93.10 Although the proportion of people unemployed is higher than average, a positive trend is that the percentage of economically active but unemployed people has fallen in recent years from peaks of 8.2% in 2009 and 8.8% in 2013. The unemployment rate now is the lowest it has been over the past 11 years. Those receiving Job Seekers Allowance (JSA) is now 2,870 which is over 50% less than the number claiming JSA back in 2010 6220.¹³⁰

3.93.11 The employment rate for ethnic minorities is significantly lower than for those of white ethnicity (53% compared to 74% in 2014/2015). This is below the England average of 62%.¹³¹

Jobs Density

3.93.12 Job density is the number of jobs per resident aged 16-64. A job density of one would mean there is one job for every resident aged 16-64. Job density within the city in 2015 is 0.81 and is slightly lower than that of the South East (0.85) and Great Britain (0.82).

¹²⁸ [Data to inform the emerging CESP 2016](#)

¹²⁹ Data to inform the emerging CESP 2016 as before.

¹³⁰ Data to inform the emerging CESP 2016 as before.

¹³¹ Data to inform the emerging CESP 2016 as before.

3.93.11 Over the last 10 years jobs density has decreased slightly in Brighton & Hove from a peak of 0.86 in 2005 to what it is now. It has however continued to rise on an annual basis since 2009 when job density dropped to 0.73 potentially reflective of the global recession. Job density also peaked regionally and nationally in 2005, however at that time job density was higher in Brighton & Hove than the regional and national average.

3.93.12 It is estimated that there are over 150,000 jobs in Brighton & Hove which accounts for around a third of all the jobs in the Greater Brighton & Coastal West Sussex area and represents the largest economy in the sub-region. The number of workforce jobs increased by 27% in the 1997-2014 period, the highest amongst all authorities in the sub-region.¹³²

Productivity

3.93.13 GVA, or Gross Value Added is a measure of the value of goods and services produced in an area. GVA per head was £24,161 in 2014.¹³³ This has increased gradually over time however is lower than both the England (£25,357) and South East (£27,012) averages suggesting there is scope for the local economy to be more productive.

Business Growth

3.93.14 Between 2003 and 2014 there was a net business formation of +2,035 businesses in the city.¹³⁴ This is measured by the number of new businesses starting minus the number of businesses closing. During the period 2003-2008 there was net growth, during the period 2008-2010 there was a net decline, and during the period 2010-2014 there was net growth again as the economy recovered from the recession.

In/out-commuting

3.93.15 According to the 2011 census 31,915 people commute into the city for work on a daily basis, while 37,310 commute out of the city for work. The primary areas that people are commuting in from are:

- Lewes (+8,478)
- Adur (+6,615)
- Mid-Sussex (+3,492) and
- Worthing (+3,315)

3.93.16 Together, these four areas supply Brighton & Hove with 21,900 workers each day, which is over 2/3 of the total in-commute. In terms of the key

¹³² [Greater Brighton & Coastal West Sussex Background Paper 1: Economy \(2015\)](#)

¹³³ [ONS data on regional GVA](#)

¹³⁴ [Chart taken from BHCC Economic Development Quarterly Bulletin February 2015](#)

areas where residents in the city are accessing employment outside of Brighton & Hove, there are quite a few significant destinations, including:

- Lewes (-4,407)
- Mid-Sussex (-4,008)
- Crawley (-3,715)
- Westminster (-3,385)
- Adur (-3,077)
- Worthing (-2,803)
- Horsham (-1,862)

3.93.17 This shows strong connections with the Greater Brighton and Coast to Capital sub-regions. The cost of housing, as well as the availability of higher value jobs, are both likely to be key-drivers which affect in/out commuting.

Employment

Industry & Occupations

3.93.18 People are employed in a range of different industries as illustrated in the following table. The table shows that there is a large retail sector in Brighton & Hove with almost 14% of all jobs in this individual sector alone, although this is lower than the regional and national average.

3.93.19 Public sector administration, health, social work and education are also key sources of employment and provide more jobs than the regional and national average and is the largest sector providing 33% of jobs altogether. There are also more jobs in the financial and insurance, and accommodation and food services sectors than the regional and national averages, and less in construction and manufacturing.

Table 24: Percentage in employment by sector¹³⁵

Industry	Brighton & Hove	South East	Great Britain
Wholesale and retail trade; repair of motor vehicles and motor cycles	13.7%	15.6%	15.9%
Human Health and Social Work	13.4%	11.6%	12.4%
Education	12.4%	10.1%	9.9%
Professional and scientific	7.7%	7.5%	6.7%
Financial and insurance activities	6.7%	4.5%	4.4%
Accommodation and food service activities	6.5%	5%	5.6%
Construction	6.1%	8%	7.7%
Information and communication	6.1%	5.5%	4.1%

¹³⁵ [BH Census 2011 Briefing Economy and Employment](#)

Industry	Brighton & Hove	South East	Great Britain
Administration and support	5%	5.2%	4.9%
Public administration and defence; compulsory social security,	4.4%	6%	5.9%
Transport and storage	4.2%	5.2%	5%
Manufacturing	3.7%	7.2%	8.8%
Real estate	1.8%	1.4%	1.5%
Electricity, gas, steam and air conditioning supply	0.8%	0.6%	0.6%
Water supply, sewerage and waste management	0.5%	0.7%	0.8%
Agriculture	0.1%	0.7%	0.8%
Mining & Quarrying	0%	0.1%	0.2%
Other	6.6%	5.1%	5%

Percentages show proportion of total employee jobs and does not include those in self-employment.

Tourism sector

3.93.20 Although not apparent from the above table, the tourism sector provides a large number of jobs in the city. In 2011, the city attracted around eight and a half million visitors, generating significant income for the city. In 2011 tourists were estimated to have spent over £696 million in the city, and a further £26 million was estimated to have been spent by residents hosting friends and relatives staying. Around 14 per cent of jobs in the city are supported by the turnover generated through tourism, spread across travel & transport, hospitality, leisure and retail sectors. ¹³⁶

CDIT sector

3.93.21 Again, not apparent from the above table, the Creative, Digital and IT sectors are also significant in the city, with this sector worth an estimated £713m to the economy. ¹³⁷ Between 2010-2013 there was a 38% growth in employment in this sector, compared to the average growth across all sectors in Brighton & Hove of 8.1%. ¹³⁸ It has been estimated that 23% of all businesses in Brighton & Hove are in the CDIT sector. ¹³⁹

Third Sector

3.93.22 The city's community and voluntary sector is well developed, with an estimated 1,600 organisations generating £96 million for the local economy. It is estimated that 8,000 people are employed in this sector, with a further 19,000 people carrying out voluntary positions.

¹³⁶ [The Economic Impact of Tourism Brighton & Hove 2011: Tourism South East Research Unit](#)

¹³⁷ [The Brighton Fuse Report 2013](#)

¹³⁸ [Brighton & Hove Economic Development Quarterly Bulletin February 2015](#)

¹³⁹ [Coast to Capital Economic Assessment 2015](#)

Occupation types

3.93.23 Occupations data is generally categorised into nine minor occupation groups as detailed in the following table. The table shows the proportion of Brighton & Hove's workplace population by occupation and in comparison to regional and national proportions. The proportion of people employed in professional occupations (groups 1,2 and 3) is higher at 57.1% than the regional (49.2%) and national (44.4%) averages.

Table 25: Proportion in employment by occupation type (2015)¹⁴⁰

	Brighton & Hove	South East	Great Britain
1. Managers, directors and senior officials	11.4%	12.1%	10.4%
2. Professional occupations	25.5%	21.7%	19.8%
3. Associate professional and technical occupations	20%	15.2%	14.1%
4. Administrative and secretarial occupations	8.4%	11%	10.7%
5. Skilled trades occupations	6.5%	9.8%	10.6%
6. Caring, leisure and other service occupations	9.2%	8.7%	9.2%
7. Sales and customer service occupations	6.1%	7%	7.7%
8. Process plant and machine operatives	2.2%	5%	6.3%
9. Elementary occupations	10.2%	9.1%	10.8%

Percentage shows proportion of all persons in employment

Business floorspace

3.93.24 Brighton & Hove contains over 22% of the total B-class employment floorspace in the Greater Brighton & Coastal West Sussex region. It also contains over 40% of the total office stock of the region.¹⁴¹

3.93.25 In order to meet growth requirements, it is recommended that 112,240sq m of office floorspace (B1a and B1b) and 43,430sq m of industrial floorspace (B1c, B2 and B8) will be required by 2030.¹⁴² Development set out in the City Plan Part 1 should provide 96,000sq m of office and 9,500sq m of industrial floorspace to contribute towards this requirement.

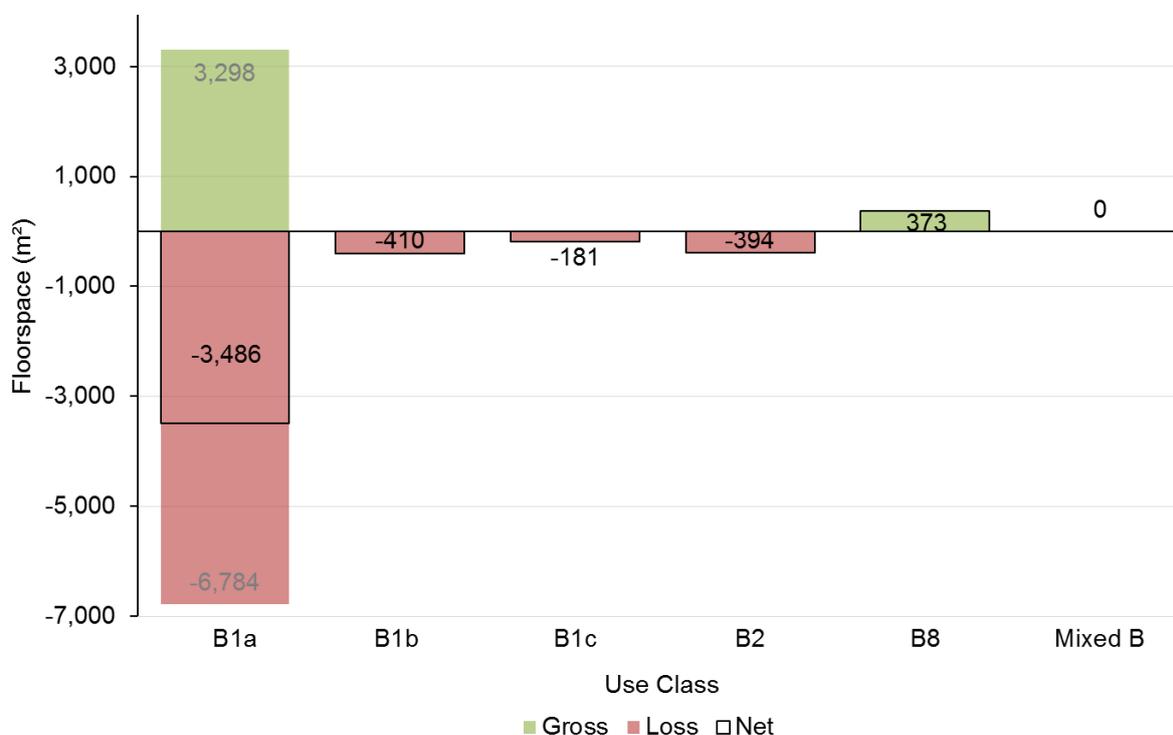
¹⁴⁰ [Local Authority Profile on Nomisweb](#)

¹⁴¹ [Greater Brighton & Coastal West Sussex Background Paper 1: Economy \(2015\)](#)

¹⁴² [Employment Land Study Review 2012](#)

3.93.26 In 2014/15 3,671 m² of employment floorspace was created, but 7,769m² was lost, resulting in an overall net loss of 4,098m².¹⁴³ This follows on from a net loss of 3,486m² in 2013/2014. The following chart illustrates the gains and losses by type of floorspace. It shows that, with the exception of B8, there were net losses in all types of employment floorspace.

Figure 13: Gains and losses in employment floorspace 2014/2015



3.93.27 Since 2010/11 there have been two years in which there has been a net loss of employment floorspace, including 2014/2015. Overall, however, there has been a net gain of 5,466 m² employment floorspace over the past five years including 3,888 m² of office space. Long term trends (2000-2012) indicate an overall increase in office space stock of 7%.¹⁴⁴ The average net development rate per annum over this five year period was 1,093m². This continues the trend of a reducing five year net development rate due to a lack of employment land supply being offered in the city.¹⁴⁵ This is significantly below the Employment Land Supply Delivery Trajectory 2013 which predicted delivery in this period would be at broadly similar levels to the historic rate, averaging about 5,900 m² per annum. This will have implications for delivery of office supply. Over the twelve year period between 2000-2012 that has been an overall reduction in industrial floorspace of -5%.¹⁴⁶

¹⁴³ [AMR 2014/2015](#)

¹⁴⁴ [Greater Brighton & Coastal West Sussex Background Paper 1: Economy \(2015\)](#)

¹⁴⁵ [AMR 2014/2015](#)

¹⁴⁶ [Greater Brighton & Coastal West Sussex Background Paper 1: Economy \(2015\)](#)

3.93.28 In 2013, permitted development rights allowed for the change of use from offices to residential without the need for planning permission. These have to undergo the Prior Approval process which allows the potential losses to be monitored. In the 2013-2015 period there were 84 prior approval applications. If all these approvals were implemented this would represent a loss of an estimated 24,050 m² of office floorspace and a gain of an estimated 402 residential units. The central area of the city is subject to an Article 4 Direction which removes this permitted development right.

3.93.29 Although these developments have assisted in increasing the number of residential units in the city and may be replacing office buildings which are not suited to current business needs; the availability of office space has started to reduce dramatically despite the demand for office space in the city remaining strong.

Retail Provision

3.93.30 In order to meet retail growth, it is recommended that 58,313sq m of comparison floorspace (non-food) and 2,967sq m of convenience floorspace (food) will be required by 2030.¹⁴⁷ Significant retail development is directed to the Brighton Regional Centre.

3.93.31 The city contains a hierarchy of shopping centres, including the Regional Centre (Brighton), the Hove and London Road Town Centres, the St James' Street, Lewes Road, Boundary Road/Station Road District Centres and a number of Local Centres. Performance is monitored by the council.

3.93.32 There was a 2,771 m² net increase of all A use classes in 2014/15. It included a 2,357 m² net gain of A1 floorspace; this is the largest net gain of A1 retail floorspace recorded in the past ten years. There was also a net gain of restaurant and café floorspace (903 m²) and takeaways (149 m²).¹⁴⁸

3.93.33 Before 2014/15; the trend had been towards a loss of retail and financial and professional services, since 2010/11, but the gain of retail floorspace in the monitoring year has created a net gain of retail floorspace over the past five years. The amount of financial and professional services continued to reduce, however, the largest decreases having been in the last two monitoring years. The table below illustrates the changes (gains and losses) since 2010/11.

¹⁴⁷ [Retail Study Update 2011](#)

¹⁴⁸ [AMR 2014/2015](#)

Table 26: Changes across A uses 2010-2015¹⁴⁹

	A1	A2	A3	A4	A5	Mixed A	Total
2014/15	2357	-499	903	-256	149	116	2771
2013/14	65	-702	860	370	84	750	1427
2012/13	-1766	-332	2812	-462	40	0	292
2011/12	-312	199	717	546	164	925	2239
2010/11	213	264	1442	-43	284	316	2476

Retail health checks

3.93.34 Annual health checks are carried out on retail centres to monitor the range of uses and therefore the vitality and viability of each centre. The last checks were reported in the AMR 2013/14. They found that 61% of all units were in retail (A1) uses which is a reduction of 8% from the previous year. The vacancy rate across all centres is 6% which is a 1% reduction from the previous year.

3.93.35 Of the five District and Town Centres only London Road has experienced a fall in vacancy rates since 2011/12; which has dropped by six percent over the past two years. The vacancy rate has increased by four percent in the Boundary Road/Station Road District Centre. Hove Town centre continues to have the lowest vacancy rate of only three percent.

Education & Skills

Schools

3.93.36 There are 54 primary level schools (including infants, juniors and primary) in the city and 10 secondary schools. There is one primary school which is a free school; the Bilingual School and one secondary school which is a free school; King's School. Two of the city's schools are academies; Portslade Aldridge Community Association and Brighton Aldridge Community Association. A number of the schools are voluntary aided faith schools.¹⁵⁰

3.93.37 For the September 2016 intake, there were 3,060 reception age school places and 2,610 secondary school places in the city. On allocation day, 2,686 reception places were offered and 2,232 secondary places were offered to on-time applicants.

3.93.38 Over the last eight years 475 new reception class spaces have been provided in areas of greatest demand across the city. There are sufficient primary places overall to meet the needs of the growing number of primary age children. However the places are not all in the right places, and there are challenges in certain areas including the south of Hove as well as in some localised areas such as Saltdean where schools are oversubscribed. On the other there are a small number of schools, mainly on the periphery of

¹⁴⁹ [AMR 2013/2014 and 2014/15](#)

¹⁵⁰ <http://www.brighton-hove.gov.uk/content/children-and-education/school-admissions>

the city, including Portslade, West Blatchington and Moulsecoomb with spare places which are hard to fill because of their location. ¹⁵¹

3.93.39 The increase in primary age children experienced over the last ten years started to reach the secondary sector in 2014 and current forecasts suggest an increase of between 400 and 500 students entering Year 7 by 2019 compared with 2013. Additional school places will need to be provided to meet this demand.

Educational achievement in schools

Key Stages 1 and 2

3.93.40 For pupils at Key Stage 1 (Year 2), the overall standards remain slightly above the national average for reading, writing and maths. At Key Stage 1 the national expectation is for a pupil to attain Level 2 or above for reading, writing and mathematics. In 2015, 91% of pupils achieved Level 2 or above for reading, 89% for writing and 94% for maths. The averages for England for 2015 are 90%, 88% and 93% respectively. ¹⁵²

3.93.41 For pupils at Key Stage 2 (Year 6), the overall standards remain slightly above the national average. At Key Stage 2 the national expectation is for a pupil to attain Level 4 or above for a combined measure for reading, writing and maths. In 2015, 82% of pupils achieved Level 4 or above compared to an England average of 80%. ¹⁵³

3.93.43 Attainment levels for both Key Stages 1 and 2 have seen steady improvements over time however vary across the city. There is also a gap in attainment between girls and boys, between children in receipt of free school meals and those who are not, and those who have a special educational need.

Table 27: Average Key Stage 1 and 2 Attainment 2012-2015 (all pupils)

	2012 (%)	2013 (%)	2014 (%)	2015 (%)
Key Stage 1 – (Reading)				
Brighton & Hove	86	90	91	91
South East	88	90	91	92
England	87	89	90	90
Key Stage 2				
Brighton & Hove	75	79	81	82
South East	75	76	79	81
England	75	75	78	80

¹⁵¹ [BH Schools Organisation Plan 2013-2017](#)

¹⁵² [Government Statistics: Phonics Screening Check Results](#)

¹⁵³ [Government Statistics: Key Stage 2 results 2015](#)

Key Stage 4

3.93.44 Key stage 4 examinations are taken at year 11 and are of GCSE level. The indicator to compare attainment is based on the number and proportion of pupils achieving 5 or more GCSEs including maths and English at grade A* to C. In 2015, 61% of pupils achieved this standard compared to 54% nationally.¹⁵⁴

Table 28: GCSE attainment 2011-2015

	2011 (%)	2012 (%)	2013 (%)	2014 (%)	2015 (%)
Brighton & Hove	52.8	56.4	62.2	53.6	61
South East	59.6	60.2	62.4	59	59.9
England	59	59.4	59.2	53.4	53.8

3.93.45 The attainment of GCSEs appears to have improved in recent years from being lower than the national average to above. However this varies widely across the city with children in more deprived areas doing significantly less well than those in less deprived areas. GCSE attainment measured by Average Point Score per pupil across Brighton & Hove is an average of 356 points, which is slightly less than the England average of 368 points. This varies significantly between wards, with the average score in East Brighton ward being 289 points, compared to the average score in Hove Park ward of 433 points. This also varies significantly within wards, with the lowest scoring Local Super Output Area being situated within the Queens Park ward, achieving a score of 197 points.¹⁵⁵

3.93.46 As with Key Stages 1 and 2, there is also a gap in attainment between girls and boys, and those in receipt of free school meals or those with special educational needs.

Not in Employment Education or Training (NEET)

3.93.47 The definition of young people who are NEET includes those who are aged 16-24 and who are not either enrolled on an educational course, participating in an apprenticeship, on a government supported training programme, working towards a qualification or in employment. In 2014/2015 4.7% of 16-18 year olds were defined as NEET. This has decreased from 6.9% 2012/2013 and appears to be showing a continuing trends of decreasing.¹⁵⁶

¹⁵⁴ [Government Statistics GCSE results 2014/2015](#)

¹⁵⁵ <http://brighton-hove.communityinsight.org/#>

¹⁵⁶ [Government Statistics NEET 2012](#)

Adult Skills

3.93.48 A high proportion of adults have an NVQ4 level qualification (degree level) or above compared with the regional and national averages. The proportion of adults which have no qualifications is lower than the regional and national averages as illustrated in the following table.¹⁵⁷

Table 29: Highest level of qualification held

	Brighton & Hove	South East	Great Britain
NVQ4 or above	48.7%	39.8%	37.1%
NVQ3 or above	68.7%	60.5%	57.4%
NVQ 2 or above	80.4%	76.8%	73.6%
NVQ 1 or above	90%	88.5%	84.9%
Other	4.4%	5.2%	6.5%
None	5.6%	6.3%	8.6%

3.93.49 Analysis over a 10 year period shows there is a general trend for an increase in the proportion of the working age population to be educated at NVQ4 or above. This is also the trend nationally.

3.94 LIKELY FUTURE BASELINE

3.94.1 Brighton & Hove is likely to continue to provide a large proportion of the jobs available within the wider sub-region and be strategically important economically, along with Chichester.

3.94.2 The local economy is likely to continue to grow and new jobs are likely to be created.

3.94.3 Emerging industries, such as green industries are likely to grow, through ongoing investment and support.

3.94.4 Existing industries, such as the CDIT sector will continue to grow and will play a role in helping to increase average wages locally.

3.94.5 Public administration, education and health is likely to remain the highest employment sector in the city.

3.94.6 The tourism and retail sectors will continue to be major sources of employment in the city.

¹⁵⁷ Data taken from [Local Authority Profile NomisWeb](#)

- 3.94.7 GVA is likely to become comparable with the South East and England averages through growth in higher value sectors.
- 3.94.8 There is likely to be a shortfall between the amount of new office and industrial floorspace delivered by 2030 compared with the demand required to meet forecasts in economic growth.
- 3.94.9 There is likely to be a continued loss of employment land to residential uses through permitted development. This is likely to lead to other effects such as increased rents for employment land and may constrain the local economy.
- 3.94.10 The number of school places required across the city will continue to increase in-line with the predicted increase in population. Pressure on existing schools in central areas of the city is likely to remain.
- 3.94.11 The number of schools that are academies is likely to increase in the future reflecting changing government priorities.
- 3.94.12 The proportion of the adult population with high level skills is likely to increase and the proportion of adults with no qualifications is likely to decrease.
- 3.94.13 Overall achievement at Key Stage 4 (GCSE) across the city should continue to improve. However, attainment at all levels for children living in the most deprived areas is likely to continue be the lower than the Brighton & Hove and national average, and will be much lower than those living in the least deprived areas.

3.95 SUSTAINABILITY ISSUES

- 3.95.1 The key sustainability issues identified from the context and baseline review are:
- There are a high proportion of low value jobs leading to lower than average incomes. There is a need to diversify the local economy to support growth of high value and highly paid industries, such as those in the CDIT sector, whilst recognising the contribution that lower paid service sector jobs make to the local economy.
 - Land in employment uses is being lost to residential development through permitted development rights. This will increase the pressure on remaining floorspace. The local economy could become suppressed through lack of workspace which will have implications within the city as well as within the wider sub-region. This increases the need to provide a range of new employment floorspace in the

city to help meet forecasted requirements and to unlock the delivery of identified office sites.

- There are areas in the city suffering from high levels of education and employment deprivation and large gaps in attainment between those living in the most deprived areas compared with the rest of the city.
- There is an increasing need for school places, to meet both existing and future requirements. Many of the city’s existing schools are already very large making it difficult to increase their capacity, and there is a lack of sites that may be suitable for new school provision in the areas where it is most required.
- There is a high proportion of adults with high skills levels but a lack of highly skilled job opportunities. This leads to increased competition in lower skilled jobs, people taking jobs for which they are overqualified and excluding less skilled people out of the jobs market.

3.96 DATA LIMITATIONS

3.96.1 The availability of economic data and data on education and skills is generally good and up to date. The Index for Multiple Deprivation has been released recently.

3.97 SUGGESTED SUSTAINABILITY OBJECTIVES AND DECISION-MAKING CRITERIA

Policies

3.97.1 The following SA Objectives and DMC are proposed to assess emerging policy options. It should be noted that not all decision making criteria will be of relevance to this topic, but have been included as they relate to the overarching SA Objective.

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	<ul style="list-style-type: none"> • Help increase supply of land in employment uses • Support existing, new and emerging sectors • Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace

	<ul style="list-style-type: none"> • Enable the growth of high value, low carbon business • Allow for flexible working practices • Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment. • Increase the quantity and quality of employment opportunities in a range of different sectors. • Enable local people to gain new skills to increase their employment opportunities
To increase equality and social inclusion	<ul style="list-style-type: none"> • Improve access to education, life-long learning and training opportunities, especially in the most deprived areas • Improve access to employment opportunities
To improve the range, quality and accessibility of services and facilities.	<ul style="list-style-type: none"> • Increase provision of key local services, including for example health, education, retail or community facilities. • Ensure the vitality of town, district and local shopping centres • Improve access to local services. • Enable communities to meet their day-to-day needs locally

Sites

3.97.2 The following SA Objectives and DMC are proposed to assess site allocations:

Proposed SA Objective	Proposed Decision Making Criteria (Will the site...)	
To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Site could provide new land for employment uses and a range of job opportunities; or site has potential to provide better quality jobs on an existing employment site.
	+	Site already in employment use, but provides a limited number of jobs and has limited potential to increase capacity.
	0	Site identified for housing or alternative use. Not suitable for employment.
	-	Will result in loss of some jobs, but not loss in employment land.
	--	Will result in significant loss of jobs and/or

		land in existing employment uses.
To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing (15 or more dwellings) Potential to deliver housing for people with protected characteristics or particular communities. Site located within 20% most deprived SOA (education or employment domain) and could offer employment/skills opportunities.
	+	Site has potential to deliver 20%-30% affordable housing (5-14 dwellings). Site located in close proximity to 20% most deprived SOA (education or employment domain) and has potential to offer employment/skills opportunities.
	0	
	-	Site unlikely to deliver any affordable housing or housing for people with protected characteristics. Site unlikely to provide opportunities that could reduce education/employment deprivation.
	--	Site could encourage social exclusion/isolation through access issues, and/or would provide employment in an un-accessible location.
To improve the range, quality and accessibility to services and facilities.	++	Site offers good potential to increase/improve a range of local services. Existing services within desirable walking distance (town centre <200m; health <400m ¹⁵⁸ ; open space <480 to <720m; sports <960m ¹⁵⁹ ; primary school <1,000m; secondary school <1,500m ¹⁶⁰ . Excellent opportunities to walk/cycle.
	+	Site offers some potential to increase/improve some services. Services within an acceptable walking distance (town centre 200-400m; health 400-800m; open space 480-720m; sports

¹⁵⁸ Distances people are willing to walk taken from [Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000](#)

¹⁵⁹ Distances for open space and sports taken from [Open Space, Sports and Recreation Study 2008](#)

Accessibility Standards

¹⁶⁰ Distances to school based on "statutory walking distances" set in Government Statutory Guidance and from [Guidelines for Providing Journeys on Foot, Institute of Highways and Transportation 2000](#)

		<960m; primary school 1,000-1,750m; secondary school 1,500-2,500m). Good opportunities to walk/cycle
	0	
	-	Site does not offer potential to increase/improve services. Services at Preferred Maximum walking distance (town centre 800m; health 1,200m; open space 480-720m; sports 960m; primary school 1,750-2,500m; secondary school 2,500-4,000m). Limited opportunities to walk/cycle.
	--	Site offers no potential to increase/improve services. Services more than Preferred Maximum walking distance (town centre >800m; health >1,200m; open space >480->720m; sports >960m; primary school >2,500m; secondary school >4,000m), No opportunities to walk/cycle

Section 4 Sustainability Appraisal Framework and Proposed Methodology

4.1 Introduction

4.11 Stage A4 of the Sustainability Appraisal process requires the development of a sustainability appraisal framework. In each of the topic chapters, Sustainability Appraisal Objectives have been developed to address the overarching issues identified. In addition, Decision Making Criteria have been developed which can be described as sub-objectives. Some Sustainability Appraisal Objectives are relevant and applicable to more than one topic area. Together, the Sustainability Appraisal Objective and Decision Making Criteria will guide the Sustainability Appraisal process undertaken on the emerging Plan.

4.12 The Sustainability Appraisal Objectives and Decision Making Criteria are shown in the following tables and will be used to assess emerging policies and site allocations.

4.2 Proposed SA Framework – Policies

4.21 Table 30 shows all the Proposed SA Objectives and Decision Making Criteria that will be used to assess emerging policies and options for policies.

Table 30: Proposed SA Framework

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
Environmental	
1. To protect, conserve and achieve a net gain in biodiversity	<ul style="list-style-type: none"> • Protect and enhance international and national designated sites (e.g. SAC, SSSI, NNR, RIGS). • Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species. • Protect and prevent the loss of irreplaceable habitats such as Ancient Woodland. • Increase understanding and access to biodiversity/nature for local people. • Provide opportunities to achieve a net gain in biodiversity • Recognise the multi-functional benefits of ecosystem services provided by biodiversity and green infrastructure • Improve links between existing and/or new biodiversity and the Green Network/Nature Improvement Area
2. To protect and improve open space and green infrastructure and improve sustainable access to it	<ul style="list-style-type: none"> • Contribute to meeting the city's open space, sports and recreation requirements • Improve the quality or make better use of existing open space • Replace existing open space with improved quality or quantity • Improve sustainable access to existing or new open space • Increase opportunities for use of open spaces, including the

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
	seafront <ul style="list-style-type: none"> • Protect and enhance public rights of way • Encourage the incorporation/creation of various types of open space within development
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	<ul style="list-style-type: none"> • Protect the landscape character and special characteristics of the SDNP and its setting • Protect and enhance important views to and from the SDNP • Encourage sustainable access to the SDNP • Promote sustainable tourism to the SDNP • Limit the impact of light pollution on the SDNP • Protect and enhance public rights of way
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	<ul style="list-style-type: none"> • Protect, conserve and enhance listed buildings, historic parks & gardens, conservation areas and scheduled ancient monuments and their settings. • Take account of assets on the Local List • Recognise the potential for undesignated archaeological assets. • Support the integration of new development into the built and historic environment • Respect, maintain and strengthen local character and distinctiveness • Promote high quality design that establishes a strong sense of place • Take into account the existing character of adjacent communities and neighbourhoods.
5. To reduce the need to travel, encourage sustainable modes of travel and improve travel choice	<ul style="list-style-type: none"> • Encourage mixed-use development and sustainable communities that reduce the need to travel • Encourage the location of development close to where use of sustainable transport can be maximised • Improve public and sustainable transport infrastructure including links and access • Encourage health-beneficial forms of transport including cycling and walking • Promote low-carbon forms of transport • Improve road safety to encourage cycling and walking • Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations • Protect and enhance public rights of way
6. To improve air and noise quality	<ul style="list-style-type: none"> • Minimise the causes of air pollution • Reduce the need to travel • Support the development of cleaner technologies (e.g. low-emission vehicles) • Take account of Air Quality Management Areas, where relevant. • Support measures that reduce road related noise
7. To improve water quality (ecological, chemical and quantity status)	<ul style="list-style-type: none"> • Encourage remediation of despoiled, degraded or contaminated land • Ensure remediation of land does not result in contamination of water resources • Encourage sustainable drainage solutions including green infrastructure • Reduce the risk of surface water run-off

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
	<ul style="list-style-type: none"> • Encourage sustainable use of water • Reduce water consumption • Maximise re-use of waste-water • Conserve and maintain water resources
8. To reduce the risk from all sources of flooding to and from development	<ul style="list-style-type: none"> • Direct development to areas of lower flood risk (all sources of flooding) • Incorporates measures to reduce vulnerability to flood risk • Ensure the risk of flooding elsewhere is not increased by development • Incorporates sustainable drainage techniques • Maintains or improves coastal defences
9. To reduce emissions of greenhouse gases that cause climate change	<ul style="list-style-type: none"> • Encourage renewable energy generation • Encourage low/zero carbon development • Encourage energy efficient design • Facilitate development of decentralised energy networks • Encourage adoption of nationally described building standards / or environmental standards
10. To increase the city's resilience and ability to adapt to climate change	<ul style="list-style-type: none"> • Considers the potential risks and consequences of flood risk and does not increase flood risk elsewhere. • Incorporates sustainable drainage techniques, including those that have benefits for biodiversity. • Incorporates features that may help to maintain temperatures, such as green roofs and tree-planting and recognise the services provided by ecosystems. • Ensures the design of development considers the future impacts of climate change. • Incorporates features to maximise efficient use of resources.
11. To improve soil quality	<ul style="list-style-type: none"> • Promote sensitive management of land in open space or agricultural uses • Encourage remediation of despoiled, degraded or contaminated land • Ensure development is delivered in a way that does not result in further dispersal of contaminants • Encourage sustainable drainage solutions
12. To minimise and sustainably manage waste	<ul style="list-style-type: none"> • Promote waste reduction, re-use, recycling and recovery in line with the waste hierarchy • Facilitate improved accessibility to recycling and other waste management facilities • Promote building design that is resource efficient and minimises construction waste • Promote the use of secondary and recycled materials including the re-use of existing materials and buildings.
13. To make the best use of land available	<ul style="list-style-type: none"> • Regenerate derelict areas and areas of previously developed land • Help to reduce the number of vacant buildings through adaptive re-use • Maximise the efficient use of land by high density development in suitable locations • Maximise the efficient use of land e.g. through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings.

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
	<ul style="list-style-type: none"> • Promotes some retention of ecosystem services on Greenfield sites with development potential
Social	
14. To provide housing, including affordable housing, to contribute towards meeting local needs	<ul style="list-style-type: none"> • Help to boost housing supply and help meet the housing target • Provide a wide mix of housing types, sizes and tenures. • Increase the availability of affordable housing • Address the housing needs for various sections of the community including students, older people, disabled people, families, gypsies and travellers, and smaller households. • Provide decent, high quality housing that can meet changing requirements.
15. To improve the range, quality and accessibility of services and facilities.	<ul style="list-style-type: none"> • Increase provision of key local services and facilities, such as health, education, cultural, recreation, retail and community facilities. • Ensure the vitality of town, district and local shopping centres • Improve access to local services. • Enable communities to meet their day-to-day needs locally
16. To improve health and well-being, and reduce inequalities in health	<ul style="list-style-type: none"> • Encourage and facilitate walking and cycling • Improve access to open space, the countryside, the seafront and other opportunities for physical activity • Improve environmental quality and therefore minimise adverse impacts on health from various forms of pollution • Reduce the likelihood of health inequalities through improvements to the social determinants of health • Improve access to health facilities
17. To improve community safety, and reduce crime and fear of crime	<ul style="list-style-type: none"> • Promote design that facilitates greater community interaction • Provide opportunities for greater community interaction • Seek to minimise crime and facilitates improvements in community safety • Seek to improve road safety
18. To increase equality and social inclusion	<ul style="list-style-type: none"> • Consider the needs of all members of the community, particularly those with protected characteristics • Improve access to education, life-long learning and training opportunities • Improve access to employment opportunities • Contribute towards reducing deprivation • Encourage the development of mixed communities.
Economic	
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	<ul style="list-style-type: none"> • Help increase the supply of land in employment uses • Support existing, new and emerging sectors • Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace • Enable the growth of high value, low carbon business • Allow for flexible working practices • Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment. • Increase the quantity and quality of employment opportunities in a range of different sectors. • Enable local people to gain new skills to increase their employment

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
	opportunities

4.3 Methodology for Policy Assessments

4.31 Each option or policy that is presented in the emerging Plan will be considered against each of the SA objectives above. The following scores will be used to show the likely effects. In addition, mixed positive/negative impacts may also be applicable

++	Significant positive impact
+	Minor positive impact
0	No impact
-	Minor adverse impacts
--	Significant adverse impact
?	Uncertain impact

4.32 In addition the assessment will consider the following:

- Whether effects are likely to take place over the short, medium or long term
- Whether effects will be temporary or permanent
- Whether there will be synergistic or cumulative effects

4.4 Proposed SA Framework - Sites

4.41 The appraisal of sites will be undertaken to inform the site selection/land allocation process in the City Plan Part 2. By testing sites against the SA framework, the SA should be able to guide the City Plan towards the sites with the most positive sustainable outcomes. The SA may also suggest alternative sites or scenarios to be tested, or provide mitigation to improve the quality of the potential allocation. The following framework and decision making criteria will be used during site assessment.

Table 31: Proposed SA Framework - Sites

Proposed SA Objective	Score	Proposed Decision Making Criteria (Will/does the site...)
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site; does not contain and is not adjacent to any nature conservation designations, nor does it contain any BAP priority habitats/species, nor sites with potential for nature conservation interest, and site offers potential for nature conservation enhancement.
	+	PDL site; does not contain and is not adjacent to any nature conservation designations, but has potential for some nature conservation interest. Site offers potential for nature conservation enhancement.
	0	Site would result in neither losses, nor gains for biodiversity and would have no impact on designated sites.
	-	Site contains a locally designated site (LNR, LWS or Ancient Woodland), or contains a local BAP habitat or species, or contains trees subject to a TPO. Or, site is a greenfield site with potential for some biodiversity interest.
	--	Site contains a nationally or internationally designated site (SAC, SSSI), or is within a SSSI Impact Risk Zone.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	Site offers potential to result in an increase in public open space/green infrastructure. Site meets accessibility standards for 2 or more types of existing open space.
	+	Site offers potential to result in an improvement to existing open space/green infrastructure. Site meets accessibility standards for at least 1 type of open space.
	0	Site will not result in either an increase or improvements to existing open space, nor loss.
	-	Site will result in loss of privately owned open space which is not publically accessible. Site does not meet accessibility standards for any

		types of open space.
	--	Site will result in loss of publically accessible open space, or privately owned open space which is publically accessible. Site does not meet accessibility standards for any types of open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	++	Main use of the site is to improve sustainable access to the SDNP.
	+	Site is adjacent to, or within setting of SDNP but landscape qualities are already compromised by urbanising influences (e.g. buildings/roads) and offers potential to improve appearance or access to SDNP.
	0	Site is within core urban area and is not visually prominent from the SDNP.
	-	Site is adjacent to, or within setting of SDNP but landscape qualities are already compromised by urbanising influences (e.g. buildings/roads), and offers no potential to improve appearance or access to SDNP. Or, site is adjacent to, or within setting of SDNP but is screened/obscured by vegetation/topography and will have limited visual impact.
	--	Site is adjacent to, or within setting of SDNP and possesses the same landscape character as the SDNP (e.g. open downland), and site is not screened/obscured by existing vegetation/topography and is therefore visually prominent. Or, site has an important landscape role – e.g. green wedge between city and SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Site seeks to protect and/or enhance designated heritage assets and/or their settings, and/or is likely to improve a designated heritage asset at risk.
	+	Site seeks to protect or enhance a locally listed asset and/or its setting.
	0	Site is not within, adjacent to or within the setting of any designated heritage assets. Site has no known archaeological potential.
	-	Site is within or adjacent to a locally listed asset and could result in the partial loss or deterioration of the asset. Site has known archaeological potential.
	--	Site is within or adjacent to or contains a Scheduled Monument, Historic Park & Garden, Listed Building or Conservation Area and may

		result in partial loss or deterioration of one of these heritage assets and/or their settings.
5. To reduce the need to travel, encourage sustainable modes of travel and improve travel choice.	++	Very good access (<400m) to a bus stop offering frequent services (more than once every 10 minutes); and/or 800m to a train station. Well connected to pedestrian/cycle network. Range of essential services nearby e.g. local shop (<400m). Site likely to be able to deliver an element of car-free/low-car housing.
	+	Fairly good access (between 400-800m) to a bus stop offering frequent services (more than once every 10 minutes). Fairly well connected to pedestrian/cycle network. Scope for improving public and sustainable transport provision. Essential services located between 400-800m. Site may be able to deliver an element of car-free/low-car housing.
	0	
	-	Nearest frequent bus service located more than 800m from site. Limited availability to other forms of public and/or sustainable transport. Local services (shops) located more than 800m. Some scope for improvement to public/sustainable transport services.
	--	Site located so that the car is likely to be the preferred mode of transport. Limited potential to increase/improve public transport provision. Local services situated more than 800m away
6. To reduce air and noise pollution.	++	Site located outside AQMA. Site located away from roads with daytime noise levels exceeding 55 decibels. Site use unlikely to generate significant numbers of traffic that would potentially contribute to a reduction in air quality/noise quality.
	+	Site located adjacent but not within AQMA. Sites located away from roads with daytime noise exceeding 55 decibels. Site use unlikely to generate significant numbers of traffic at all times of the day but may generate traffic at certain times of the day.
	0	
	-	Site partially located within AQMA. Site located in close proximity to roads with noise levels exceeding 55 decibels in the daytime. Potential use of site likely to generate moderate amounts of traffic at various points of the day.
	--	Site located entirely within AQMA. Site is located within an existing streetscape that may prohibit pollutant dispersal. Site located in close proximity to roads with noise levels exceeding 55 decibels in the daytime. Potential use of site likely to generate high amounts of traffic at various times of the day. Potential use of the site is not compatible with AQMA restrictions.

7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1,2, or 3 of a Groundwater Source Protection Zones.
	+	Part of site within zone 3 but not zone 1 or 2 of Groundwater Source Protection Zone.
	0	
	-	All of site within zone 3, and part of site within zone 2 of a Groundwater Source Protection Zone.
	--	Entire site located either within a zone 1 or 2 of a Groundwater Source Protection Zone.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL: Site is situated entirely within Flood Zone 1. Whole site located in area at low risk (<25% risk) of groundwater flooding. None of site has any risk of surface water flooding.
	+	Site is PDL: Site is situated within Flood Zone 1 or partially in Flood Zone 2. Small part (<25%) of site in an area considered to be at medium risk (25-50% risk) of groundwater flooding. Small part of site (<25%) has risk of surface water flooding (>0.1m in 1 in 30 year event) but is not within a SW hotspot area. Site is greenfield: Site is situated within Flood Zone 1. Whole site located in area at low risk (<25% risk) of groundwater flooding. None of site has any risk of surface water flooding.
	0	
	-	Site is PDL: Site is situated within Flood Zone 1 or 2. Large part (>50%) of site located in an area considered to be at medium risk (25-50%) of groundwater flooding. Large part (>50%) of site at risk of surface water flooding (>0.1m) in 1 in 30 year event or located within a SW hotspot. Site is Greenfield: Site within Flood Zone 1 or 2. Part of site in area of medium risk (25-50%) of groundwater flooding. Part of site has risk of surface water flooding (>0.1m in 1 in 30 year event) but is not within a SW hotspot area.
	--	PDL site located partially or wholly situated within Flood Zone 3a or 3b. Or, is a PDL site is in Flood zone 1 or 2 and is located within an area of high risk (>50%) of groundwater flooding, and/or risk of deeper water flooding (>0.3m) surface water flooding in 1 in 30yr event; or is within a SW hotspot area. Greenfield site: site located within an area of high risk (>50%) of groundwater flooding, and/or risk of deeper water flooding (>0.3m) surface water flooding in 1 in 30yr event; or is within a SW hotspot area.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site offers good potential to connect to existing/future heat network. Site has good potential to incorporate low/zero carbon energy infrastructure, e.g. solar, wind etc.
	+	Site has some potential to connect to existing/future heat network. Site has some

		potential to incorporate low/zero carbon energy infrastructure.
	0	
	-	Limited potential to connect to existing/future heat network. Limited potential to incorporate other low/zero energy infrastructure.
	--	No potential to connect to existing/future heat network. No potential to incorporate other forms of low/zero carbon energy infrastructure.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is on PDL and offers opportunity to increase green infrastructure and/or improve flood defences.
	+	Site is mainly PDL and offers some opportunity to increase green infrastructure and/or improve flood defence.
	0	
	-	Greenfield site with possibility of retaining some but not all Greenfield functions (e.g. ecosystem services such as water absorption, temperature moderation etc).
	--	Greenfield site with no possibility of retaining any Greenfield functions.
11. To improve soil quality	++	Site currently significantly contaminated, offering potential to improve.
	+	Site has potential for contamination (based on former uses), and offers potential to improve.
	0	Site not currently contaminated.
	-	Site currently contaminated with limited potential to remediate; and/or part of site contains grade 3 or higher agricultural land.
	--	Site currently contaminated with limited potential to remediate; and/or all of site contains grade 3 or higher agricultural land.
12. To minimise and sustainably manage waste	++	Site/scheme will encourage or facilitate sustainable waste management.
	+	Site will facilitate adaptive re-use of existing buildings and therefore preserve resources. Site will encourage recycling/re-use of materials.
	0	
	-	Some potential to use make use of some existing buildings or resources on site. Likely to involve some use of natural resources. Some potential uses on the site may conflict with future plans for waste management in the vicinity.
	--	No potential to make use of any of the existing buildings or resources on site. All potential uses on the site may conflict will future plans for waste management in the vicinity.
13. To make the best use of land available.	++	Site offers potential to regenerate derelict PDL; site capable of delivering high density buildings; site offers potential for multi-functional design/uses.
	+	PDL site - redevelopment will help to facilitate adaptive re-use of existing buildings. Site capable

		of delivering minimum density targets set by City Plan Part 1. Or, site is greenfield and will allow for the incorporation/retention of some existing ecosystem services.
	0	
	-	Site is PDL but is unlikely to be capable of meeting minimum density targets in City Plan Part 1.
	--	Site is greenfield, but offers no potential to retain any greenfield functions (ecosystem services).
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site likely to provide >15 dwellings. Wide range/mix of housing likely to be provided, including affordable dwellings. Or, urban fringe site, likely to provide an element of family housing.
	+	Site likely to provide <15 dwellings. Smaller range/mix of housing likely to be delivered than above due to size of site.
	0	Allocated for employment or other use. Not considered suitable for housing.
	-	Net loss of housing stock, although not affordable housing.
	--	Net loss of housing stock, including affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Site offers good potential to increase/improve a range of local services. Existing services within desirable walking distance (town centre <200m; health <400m; open space <480 to <720m; sports <960m; primary school <1,000m; secondary school <1,500m. Excellent opportunities to walk/cycle.
	+	Site offers some potential to increase/improve some services. Services within an acceptable walking distance (town centre 200-400m; health 400-800m; open space 480-720m; sports <960m; primary school 1,000-1,750m; secondary school 1,500-2,500m). Good opportunities to walk/cycle
	0	
	-	Site does not offer potential to increase/improve services. Services at Preferred Maximum walking distance (town centre 800m; health 1,200m; open space 480-720m; sports 960m; primary school 1,750-2,500m; secondary school 2,500-4,000m). Limited opportunities to walk/cycle.
	--	Site offers no potential to increase/improve services. Services more than Preferred Maximum walking

		distance (town centre >800m; health >1,200m; open space >480->720m; sports >960m; primary school >2,500m; secondary school >4,000m), No opportunities to walk/cycle
16. To improve health and well-being, and reduce inequalities in health.	++	Services within desirable walking distance (health - <400m; open space <480 to <720m; sports <960m; primary school <1,000m; secondary school <1,500m. Excellent opportunities to walk/cycle. Or, will provide any of the above services.
	+	Services within an acceptable walking distance (health – 400-800m; open space 480-720m; sports <960m; primary school 1,000-1,750m; secondary school 1,500-2,500m), Good opportunities to walk/cycle. Or will provide any of the above services.
	0	
	-	Services within Preferred Maximum walking distance (health – 800-1,200m; open space 480-720m; sports <960m; primary school 1,750-2,500m; secondary school 2,500-4,000m). Limited opportunities to walk/cycle. Will not provide any new services.
	--	Services more than Preferred Maximum walking distance (health >1,200m; open space >480->720m; sports >960m; primary school >2,500m; secondary school >4,000m), No opportunities to walk/cycle. Will not provide any new services.
17. To community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible currently by range of different transport modes. Site provides opportunity for increasing community interaction. Potential site use will support a wide or diverse range of uses. Site located in >40% deprived SOA – crime domain.
	+	Site is safely and easily accessible by limited number of transport modes. Some opportunity for increasing community interaction. Site located within 20-40% most deprived SOA – crime domain.
	0	
	-	Some access issues, possible to overcome. Limited opportunities for increasing community interaction. Site unlikely to support a range of uses and potential uses may increase the likelihood of crime. Site located within 10-20% most deprived SOA – crime domain.
	--	Significant access issues, unlikely to be overcome. No opportunity for increasing community interaction. Site located within 10% most deprived SOA crime domain or a known crime hotspot and potential use of site may increase likelihood of crime.
18. To increase equality and	++	Site has potential to deliver 40% affordable

social inclusion		housing (15 or more dwellings) Potential to deliver housing for people with protected characteristics or particular communities. Site located within 20% most deprived SOA (education or employment domain) and could offer employment/skills opportunities.
	+	Site has potential to deliver 20%-30% affordable housing (5-14 dwellings). Site located in close proximity to 20% most deprived SOA (education or employment domain) and has potential to deliver jobs/skills.
	0	
	-	Site unlikely to deliver any affordable housing or housing for people with protected characteristics. Site unlikely to provide opportunities to reduce education/employment deprivation.
	--	Site could encourage social exclusion/isolation through access issues, and/or would provide employment in an un-accessible location. Site unlikely to provide opportunities to reduce deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Site could provide new land for employment uses and a range of job opportunities; or site has potential to provide better quality jobs on an existing employment site.
	+	Site already in employment use, but provides a limited number of jobs and has limited potential to increase capacity.
	0	Site identified for housing or alternative use. Not suitable for employment.
	-	Will result in loss of some jobs, but not loss in employment land.
	--	Will result in significant loss of jobs and/or land in existing employment uses.

4.42 Sites put forward for assessment will be assessed against the above SA Framework. They will be scored as per the scoring criteria against each SA objectives above in order to help demonstrate the relative sustainability of each site or group of sites. Groups of sites will be considered in order to assess cumulative impacts.

4.43 The site assessments will help to guide whether to allocate sites or not, and will help to identify any particular mitigation that may be required, where relevant.

Section 5 Next Steps

5.1 Consultation Period

- 5.11 As described in Section 2, this Scoping Report will be subject to a 12 week period of consultation commencing the 30th June and ending on the 22 September 2016.

- 5.12 Consultation comments should be submitted in accordance with the requirements set out in Section 2.

Appendix A: Context Review – Plans, Policies and Guidance

Biodiversity

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
Birds Directive (79/409/EEC)	This Directive provides for the protection of all naturally occurring wild bird species and their habitats, with particular protection of rare species.	Member States are required to define Special Protection Areas for rare or vulnerable species listed in the Directive.
Habitats Directive (92/43/EEC)	This Directive requires the protection of species and habitats of EU nature conservation interest.	The target for Member States is to take measures to maintain or restore at favourable conservation status , natural habitats and species of Community importance. This includes Special Areas of Conservation, Special Protection Areas and it is usually accepted as also including Ramsar sites.
National		
Natural Environment and Rural Communities Act (2006)	The Act places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making which should be seeking to make a significant contribution to the achievement of the commitments made by Government in its Biodiversity 2020 strategy.	Local authorities have a duty to have regard to biodiversity conservation . Plans should include policies that promote conservation of biodiversity and the impacts upon biodiversity should be taken into account when developing policies.
The Natural Environment White Paper – The Natural Choice: securing the value of nature (NEWP, 2011)	The White Paper aims to halt the loss of biodiversity and the degradation of ecosystem services by 2020, and restore them in so far as feasible. It specifically seeks to: protect core areas of high nature conservation value; promote corridors and ‘stepping stones’ to enable species to move between key areas; and initiate Nature Improvement Areas, where ecological functions and wildlife can be restored. It promotes a landscape scale approach to biodiversity conservation and emphasises the value of ecosystem services.	Objectives of the White Paper are: <ul style="list-style-type: none"> • Protecting and improving our natural environment • Growing a green economy • Reconnecting people and nature • International and EU leadership • Monitoring and reporting The Plan should promote protection and enhancement of biodiversity, particularly at a landscape scale .
The Wildlife and Countryside Act (1981)	The act gives protection to native species (especially those at threat), controls the release of non-native species, enhances the protection of SSSIs and builds upon the rights of way rules in the National Parks and Access to the Countryside Act 1949.	Plans should include policies that ensure the conservation and enhancement of designated sites and provide criteria against which developments affecting designated sites will be addressed. Plans should include policies that protect biodiversity .
Countryside and Rights of Way Act (2000)	The act creates a statutory right of access on foot to certain types of land, modernises the PROW system and strengthened nature conservation	Plans should maintain and improve public access to certain types of land where possible. Plans should include policies for the

	legislation.	conservation and enhancement of designated sites and provide criteria against which developments affecting designated sites will be addressed.
Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (Defra, 2011)	This sets out the strategic direction for biodiversity policy for the next decade. Aims to: 'halt overall biodiversity loss, support healthy well-functioning ecosystems, and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.	In relation to planning, it states that the objective should be to: guide development to the best locations, encourage greener design and enable development to enhance natural networks . Biodiversity needs to become part of development policy on sustainable communities, urban green space and the built environment, and this should be reflected in policies to promote biodiversity conservation and enhancement .
NPPF (2012)	The environment forms one of the three dimensions of sustainable development. None of the dimensions should be taken in isolation and gains should be sought across all three. The planning system should contribute to and enhance the natural environment.	Paragraphs 109-125 specifically refer to nature conservation. In order to contribute to the Government's commitment to halt the overall decline in biodiversity, the NPPF states that the planning system should look to minimise impacts on biodiversity , with net gains in biodiversity to be provided wherever possible.
Regional & Local		
City Sustainability Action Plan (2015)	The Action Plan presents a broad set of actions being delivered across the city to support sustainability. The Action Plan is based on the 10 principles of the One Planet framework: <ul style="list-style-type: none"> • Zero Carbon • Zero Waste • Sustainable Transport • Sustainable Materials • Local and Sustainable Food • Sustainable Water • Land Use & Wildlife • Culture & Community • Equity and local economy • Health & happiness 	The Land Use & Wildlife theme aims include: <ul style="list-style-type: none"> • To increase in biodiversity, as well as supporting beautiful landscapes. • To protect locally significant species • To deliver Local Biodiversity Action Plan (LBAP) and conserve habitats and species • To use the Biosphere designation, to effectively engage, enthuse, signpost and educate residents, schools and visitors about the environment. • To encourage sustainable recreation, tourism and sustainable land use under the Biosphere umbrella.
Sustainable Community Strategy (2014)	The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals: <ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability There are then 9 further themes each delivered by a partnership approach covering the various issues.	Under the "Sustainability" theme, the aim is: to aspire to a healthy, just society, living within environmental limits by achieving a sustainable economy, promoting good governance and using sound science responsibly. Issues of biodiversity are considered under this theme.
Local Biodiversity Action Plan v.4 BHCC (2013)	The LBAP addresses the species and the habitats of particular importance in Brighton & Hove. It includes action plans covering 18 species or groups of species which are considered to have specialist requirements which can be addressed locally and which cannot be adequately addressed through local habitat action	The LBAP sets out 5 principles <ol style="list-style-type: none"> 1) Mainstream biodiversity in society 2) Integrate the conservation of biodiversity across other land uses 3) Conserve important habitats and species on a landscape scale 4) Share the benefits of biodiversity and ecosystem services 5) Establish a strong evidence base

	plans; and 14 actions plans covering habitats of greatest importance locally.	The Plan should support the aims of the BAP by considering the above principles. Site Allocations in particular should take into account the species and habitats which have an action plan when assessing suitability of sites.
A Green Network for Brighton & Hove 2009	The study identifies a green infrastructure network, identifies the locations for delivering areas of new habitat under Biodiversity Action Plan targets and to improve access for people to natural green space. The Green Network study helped identify the Nature Improvement Area which is defined in the City Plan Part 1 Policies Map.	To maximise opportunities to provide green infrastructure and link to the existing green network.
Brighton & Lewes Downs Biosphere Management Strategy 2014-2019 (2013)	The Strategy sets out the characteristics of the proposed Biosphere area, the work that is already taking place or is planned or possible, and how a Biosphere Reserve is intended to work. For each of the following topics: Nature Conservation, Sustainable Socio-Economic Development and Knowledge, Learning and Awareness , the strategy sets out what is important, what is needed, what we will be done.	Help to deliver the aims of the Brighton & Lewes Downs Biosphere: 1) to “ improve important local wildlife habitats and species, and precious environmental resources such as water, through better downland and floodplain management, enhanced landscapes and urban spaces, and new marine conservation initiatives”). 2) Take positive action to reduce energy and water use, and waste generation; encourage sustainable transport and local food production; and develop new social and economic opportunities such as outdoor health, eco-tourism and low carbon industries. 3). Increase awareness and knowledge of our environment and culture by working with local universities, schools and colleges, and the public to actively engage people in the use, appreciation, conservation and management of their local area.

Water Quality and Resources

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
Water Framework Directive (2000/60/EC)	<p>Promotes an integrated and coordinated approach to water management at the river basin scale. The Directive also requires that statutory strategic management plans be produced for each River Basin District (RBD). The Directive will help to protect and enhance the quality of:</p> <ul style="list-style-type: none"> • surface freshwater (including lakes, streams and rivers) • groundwaters • groundwater dependant ecosystems • estuaries • coastal waters out to one mile from low-water 	<p>The Directive aims for 'good status' for all ground and surface waters (rivers, lakes, transitional waters, and coastal waters) in the EU. Status is measured on both chemical and ecological grounds. Plan must ensure protection of all types of relevant water resources (groundwater and coastal water) and seek to improve water quality.</p>
A Blueprint to safeguard Europe's Water Resources (EC, 2012)	Highlights the need for Member States to reduce pressure on water resources.	Reduce pressure on water resources , for instance by using green infrastructure such as wetlands floodplains and buffer strips along water courses. Water efficiency also has an important role to play in reducing scarcity and water stress.
National		
Water for Life (White Paper) DEFRA Dec 2011	The white paper sets out the Government vision for a resilient water sector including reforms to the water industry, enabling customers to negotiate better services, enables water companies to trade supplies to secure water; and explains how the government will improve the condition of rivers by encouraging local organisations to improve water quality and make sure water is extracted from the environment in the least harmful way.	Commits to encouraging and incentivising water efficiency measures at the demand side. Consideration of the avoidance of pollution to water, Plan should seek to protect water resources and reduce water consumption .
Future water: the Government's water strategy for England DEFRA Feb-08	The strategy sets out government's overall vision and key priorities for water. The vision includes: <ul style="list-style-type: none"> • improved quality of our water environment; • sustainably managed risks from flooding and coastal erosion; • sustainable use of water resources. 	Plan should seek to protect and enhance water resources, and reduce water consumption .
NPPF (2012)	The environment forms one of the three dimensions of sustainable development. None of the dimensions should be taken in isolation and gains should be sought across all three. The planning system has a role to play in the protection of water resources.	Under the Climate Change sections, paragraphs 94 and 99 specifically refer to mitigating and adapting to climate change, taking full account of flood risk, coastal change and water supply and demand considerations .
Water for people and the environment: Water Resources Strategy for England and	Sets out the EA's strategy for water resource management for the next 25 years. The focus of the strategy is understanding the present state of water resources and planning for the management of water resources to prevent long-term environmental damage and degradation.	Brighton & Hove is located within an area where water resources are under pressure. Policies should include measures to reduce water usage in new development and protect and enhance local water resources .

Wales: Environment Agency Mar-09	The strategy highlights where water abstractions are unsustainable and where further water is needed.	
The Flood and Water Management Act: 2010 HMSO 2010	Provides for a better more comprehensive management of flood risk for people, homes and businesses. Protects water supplies to the consumer.	Take into consideration local Flood Risk Assessments and Flood Risk Strategies developed. Direct development away from areas of flood risk and ensure flood risk elsewhere is not increased as a result.
Regional and Local		
Adur and Ouse Catchment Abstraction Management Strategies (CAMS) Environment Agency 2005	Outlines the EA approach to sustainable management of water resources covering the Brighton (and surrounding) area. Highlights the fact that the Brighton Chalk aquifer underlies much of the southern area covered by the CAMS and includes the whole of Brighton & Hove. This is a very important source for public water supply and is susceptible to saline ingress from the sea and other rivers. The aquifer is currently heavily exploited and any future growth must be reliant on the sustainable provision of water.	To consider the findings of the strategy, particularly the susceptibility to saline ingress of the aquifer and the fact that growth of the city must be linked to sustainable provision of water . Ensure development does not increase the risk of or result in the pollution to groundwater resources .
River Basin Management Plan for the South East. Environment Agency Dec-09	River Basin Management Plan prepared under the Water Framework Directive, which requires all European Union member states to manage the water environment to consistent standards in order to: <ul style="list-style-type: none"> - prevent deterioration in the status of aquatic ecosystems, protect them and improve the ecological condition of waters; - achieve at least good status for all waters by 2015. Where this is not possible, good status should be achieved by 2021 or 2027; - promote sustainable use of water - conserve habitats and species that depend directly on water; - progressively reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment; - progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants; - contribute to mitigating the effects of floods and droughts. 	To take into account the objectives of the River Basin Management Plan and therefore include measures which support and contribute to halting the deterioration of aquatic ecosystems , and contribute towards the ecological and chemical improvement of water .
Water Resources Management Plan 2015-2040 (2014) Southern Water	Describes the challenges for water resources in the region and proposes solutions to both reduce demand for water and to increase the supply of water.	To consider the impact upon water resources , to be aware of the challenges regarding water resources and seek to reduce consumption of water where possible.

See also section on *Climate Change and Flood Risk*

Soil, Waste and Land Resources

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
Waste Framework Directive (2008/98/EC)	<p>The aims of this Directive are:</p> <ul style="list-style-type: none"> to provide a comprehensive and consolidated approach to the definition of the management of waste, to shift from thinking of waste as an unwanted burden to a valued resource to ensure waste prevention is the first priority of waste management to provide environmental criteria for certain waste streams <p>Targets include to recovery 70% of construction waste, and recycle 50% of household waste by 2020.</p>	To promote the key objectives of prevention, recycling and processing of waste, conversion of waste to usable materials and energy recovery.
European Thematic Strategy for Soil Protection 2006	<p>The strategy is seeking to:</p> <ul style="list-style-type: none"> Establish common principles for the protection and sustainable use of soils. Prevent threats to soils, and mitigate the affects of those threats. Preserve soil functions within the context of sustainable use. Restore degraded and contaminated soils to approved levels of functionality. 	To protect soil functions and prevent contamination to soils . Where possible restore contaminated soils .
National		
NPPF (2012)	The planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils.	<p>Key objectives are to:</p> <ul style="list-style-type: none"> Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’. Encourage the effective use of land through the reuse of land which has been previously developed
Safeguarding our Soils: A Strategy for England (Defra, 2009)	The key vision is that by 2030, all England’s soils will be managed sustainably and degradation threats tackled successfully. This will improve the quality of England’s soils and safeguard their ability to provide essential services for future generations	<p>Key objectives are that:</p> <ul style="list-style-type: none"> Agricultural soils will be better managed and threats to them addressed Soils will play a greater role in the fight against climate change and in helping us to adapt to its impacts Soils in urban areas will be sufficiently valued for the ecosystems services they

		<p>provide and given appropriate weight in the planning system</p> <ul style="list-style-type: none"> • Where development occurs construction practices will ensure that vital soil functions can be maintained • Pollution of soils is prevented and our historic legacy of contamination land is being dealt with.
Waste Management Plan for England (Defra 2013)	<p>Aims to move waste up the waste hierarchy and reduce waste.</p> <p>Targets for recycling and composting of municipal waste: 50% by 2020.</p> <p>Targets for recovery of municipal waste: 75% by 2020.</p> <p>Target for recovery of construction waste: 70% by 2020</p>	To support the aims of reducing waste sent to landfill and moving waste up the waste hierarchy .
Government Review of Waste Policy in England Defra 2011	Principal Challenges to realise long term vision of a green, zero waste economy in which material resources are re-used, recycled or recovered wherever possible and only disposed of as a last resort. :	To support the aims to move waste up the waste hierarchy and reduce waste sent to landfill.
Local		
City Sustainability Action Plan (2015)	<p>The Action Plan presents a broad set of actions being delivered across the city to support sustainability. The Action Plan is based on the 10 principles of the One Planet framework:</p> <ul style="list-style-type: none"> • Zero Carbon • Zero Waste • Sustainable Transport • Sustainable Materials • Local and Sustainable Food • Sustainable Water • Land Use & Wildlife • Culture & Community • Equity and local economy • Health & happiness 	Zero Waste: the vision for Brighton & Hove is of a city that uses resources efficiently, minimises waste levels close to zero, and ultimately sends no waste to landfill . The city follows the hierarchy of 'reduce, re-use, recycle'.
Sustainable Community Strategy (2014)	<p>The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals:</p> <ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability <p>There are then 9 further themes each delivered by a partnership approach covering the various issues.</p>	Under the "Sustainability" theme, the aim is: to aspire to a healthy, just society, living within environmental limits by achieving a sustainable economy, promoting good governance and using sound science responsibly. Issues of waste and the natural environment are considered under this theme.
Brighton & Hove Municipal Waste Management Strategy (2010)	Objectives include reducing volume of waste generated; maximising re-use, recycling and recovery of waste, and sending as little waste to landfill as possible.	To support aims to reduce waste generated and ensure householders have the facilities to enable them to reduce waste.
East Sussex, South Downs and Brighton & Hove Waste &	Policies which provide for the sustainable management and disposal of waste to 2030. Aims to reduce the environmental footprint, particularly greenhouse gas emissions associated	To reflect the aims and objectives of the Plan and ensure the requirements of the Plan can be met.

Minerals Local Plan (2013)	with the production and management of waste and minerals.	
Brighton & Hove's Contaminated Land Strategy BHCC Updated Sep '05	<p>To identify actual and potential contaminated sites within the City by rational, ordered and efficient investigation, to remove unacceptable risk to human health and the environment and prevent the creation of new contaminated sites;</p> <p>To reinforce a "suitable for use" approach enabling developers to design and implement appropriate and cost effective remediation schemes as part of their redevelopment project of contaminated sites to bring damaged land back into beneficial use;</p> <p>To identify sites which do not come under Environmental Protection Act 1990, Part IIA but could still be contaminated, to ensure that the land is suitable for its current use or can be made suitable for its intended future development use, where a receptor may be introduced.</p>	<p>Reflect the aims of the strategy, particularly: prevent creation of new contaminated sites; promote the remediation of contaminated land; to consider whether land is suitable for future development uses.</p>

Air Quality and Transportation

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
Ambient Air Quality and Cleaner Air for Europe 2008/50/EC European Parliament and Council 2008	This Directive replaces the 5 former air quality directives and is delivered alongside 2004/107/EC. The 2008 ambient air quality directive (2008/50/EC) sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM ₁₀ and PM _{2.5}) and nitrogen dioxide (NO ₂).	To maintain ambient air quality where it is already good, and improve air quality in other cases with respect to sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead.
EU Directive 2002/49/EC relating to the assessment and management of environmental noise	To define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to exposure to environmental noise; and To provide a basis for developing Community measures to reduce noise emitted by the major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery	To avoid, prevent or reduce the harmful effects of noise . Ensure that noise implications are taken into account when siting new development. The cumulative impact of noise should also be taken into consideration. This should consider not only the existing sources of noise but any combined impact sourced from a number of proposed sites in one area.
European White paper 2011: Roadmap to a Single European Transport Area - Towards a competitive and resource efficient transport system (EC, 2011)	The future prosperity of the continent will depend on the ability of all of its regions to remain fully and competitively integrated in the world economy. Efficient transport is vital in making this happen.	<ul style="list-style-type: none"> • Growing transport and supporting mobility while reaching the 60% emission reduction target • Halve the use of 'conventionally-fuelled' cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO₂-free city logistics in major urban centres by 2030/10. • 30% of road freight over 300 km should shift to other modes such as rail or waterborne transport by 2030, and more than 50% by 2050, facilitated by efficient and green freight corridors. To meet this goal will also require appropriate infrastructure to be developed.
National		
The Environment Act 1995 Part IV CLG HMSO 1995	Placed the requirement on the Secretary of State to produce the National Air Quality Strategy; and Established the statutory requirement for Local Authorities to carry out local Review and Assessments of air quality and where necessary declare Air quality Management Areas and produce Air Quality Action Plans.	To maintain ambient air quality where it is already good, and improve air quality in other cases with respect to sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead. To reflect objectives of the local Air Quality Action Plan , where present.
Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)	The strategy sets out air quality objectives and policy options to further improve air quality in the UK to deliver environmental, health and social benefits. The strategy sets objectives and targets for each air quality pollutant.	To ensure development does not contribute to an exceedence of maximum ambient concentrations of air pollutants. To ensure everyone can enjoy a level of air quality that does not pose a risk to health or

		quality of life.
Air Pollution: Action in a Changing Climate (Defra, 2010)	This focuses on the synergies between the two issues of air quality and climate change. In particular, it notes the potential for additional health benefits through the closer integration of climate and air pollution policy. It is suggested that co-benefits can be realised through a variety of means, including promoting low- carbon vehicles and renewable energy.	Air quality / climate change co-benefits will be realised through actions such as promoting ultra low-carbon vehicles, renewable sources of electricity which do not involve combustion, energy efficiency measures , and reducing agricultural demand for nitrogen .
NPPF (2012)	Air quality should be taken into consideration in preparing policies and making decisions.	Key requirements include: <ul style="list-style-type: none"> • Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. • Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. • New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or adversely affected by unacceptable levels of air pollution
NPPF (2012)	NPPF states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Paragraphs 29-41 sets out how the transport systems should be balanced in favour of sustainable transport modes.	Key requirements include: <ul style="list-style-type: none"> • Transport solutions should support reductions in greenhouse gases and congestion • Patterns of development should facilitate movement by sustainable modes of transport • Developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised • To aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities • Within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties
Transport White Paper: Creating	The Government will be targeting investment in new projects that can help build the dynamic low	To encourage sustainable local travel and thus support economic

Growth, Cutting Carbon – Making Sustainable Transport Happen (DfT2011)	carbon economy that is essential for our economic prosperity. The White Paper is about providing the early reduction in carbon emissions that local action is best placed to deliver, whilst facilitating the access to local jobs that will boost the economy.	growth by making public transport and cycling and walking more attractive and effective, promoting lower carbon transport and tackling local road congestion.
Low Carbon Transport: A Greener Future – A Carbon Reduction Strategy for Transport (2009)	The Strategy sets out how the transport sector will meet its emissions reduction obligations and contribute to the Government's overall policy on climate change as set out in the Climate Change Act 2008.	To promote low-carbon transport , which may include the use of new technologies as well as promoting modal shift .
Active Travel Strategy Department for Transport Feb- (2010)	10-year strategy to put walking and cycling at the heart of local transport plans and public health strategies. Aims include: - Every major public sector employer to be signed up to the Cycle to Work Guarantee - Cycle parking at or within easy reach of every public building - Local authorities introducing 20mph zones and limits into more residential streets to improve safety for pedestrians and cyclists.	Should reflect the aims of the strategy by implementing schemes to promote walking and cycling .
Door to Door: A Strategy for improving sustainable transport integration (DfT 2013)	The government wants more journeys to be made by sustainable transport: public transport, supported by cycling and walking. This is essential to our goal of reducing carbon emissions from transport. However, for this to happen, it must become more attractive to use sustainable transport – not just for part of the journey, but the entire door-to-door journey. It must be as convenient and straightforward to make a door-to-door journey by public transport, by bike or on foot, or by combining these different means, as by private transport	Priority areas include: <ul style="list-style-type: none"> • make use of current and new technologies to give travellers access to the information they need to plan sustainable door-to-door journeys; • improve ticketing choices and payment options so that more people can travel with a single transaction across multiple modes of transport; • increase choice through better connectivity and efficiency on transport; • make it easier to change between different modes of transport during a journey.
Local		
BH Air Quality Action Plan (2015)	In 2013 BHCC designated two areas of the city as AQMAs, revoking the former AQMA 2008. This included an area within Rottingdean High Street for the first time. The AQAP identifies road transport as the primary cause of air pollution, with older and heavier vehicles particularly polluting. The AQAP targets the most polluting traffic emissions that happen in high density retail and residential areas that have limited land and space. It sets out measures such as bus Low Emission Zones, retrofits for buses and taxis and a review of taxi-licensing policy.	Key goals includes: <ul style="list-style-type: none"> • To achieve compliance with the 40 µg/m³ level for nitrogen dioxide where people live • A targeted approach will tackle the most polluting ground level sources where road traffic emissions happen within narrow streets where volumetric space and wind flow is restricted amongst the building canopy • To promote use of electric vehicles. • To promote active forms of travel, e.g. cycling and walking. • To improve traffic flow • To promote design of development in certain locations

		to be away from sources of air pollutants.
City Sustainability Action Plan (2015)	<p>The Action Plan presents a broad set of actions being delivered across the city to support sustainability. The Action Plan is based on the 10 principles of the One Planet framework:</p> <ul style="list-style-type: none"> • Zero Carbon • Zero Waste • Sustainable Transport • Sustainable Materials • Local and Sustainable Food • Sustainable Water • Land Use & Wildlife • Culture & Community • Equity and local economy • Health & happiness 	<p>Within the section on sustainable transport, the SAP focuses on meeting the aims of “Carbon Reduction” within the LTP4 as follows:</p> <ul style="list-style-type: none"> • Reduce the need to travel for some journeys and activities. • Provide information and choices for people to enable them to travel more sustainably on a regular basis. • Promote and enable greater use of zero- and low-emission forms of transport. • Use new technology to maximise reduction of carbon emissions.
Sustainable Community Strategy (2014)	<p>The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals:</p> <ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability <p>There are then 9 further themes each delivered by a partnership approach covering the various issues.</p>	<p>Under the theme of Promoting and Providing Sustainable Travel the aim is to:</p> <p>“To continue to develop an integrated and accessible transport system that is well-maintained and enables people to travel around and access services as safely and freely as possible, while minimising damage to the environment and contributing to making our city a safer, cleaner, quieter, healthier and more attractive place.”</p>
BH Local Transport Plan 4 (2015-2019)	<p>The LTP4 sets out priorities, projects and programmes that need to be progressed in the future to help people move around the city more safely, sustainably, and easily. There are 7 key goals:</p> <ul style="list-style-type: none"> • Grow the Economy Sustainably • Reduce Carbon Emissions • Increase Safety & Security • Provide Equality, Mobility & Accessibility • Improve Health & Well-being • Enhance the Public Realm • Encourage Respect & Responsibility 	<p>The three main ways in which the council will help keep the city moving are by:</p> <ul style="list-style-type: none"> • Maintaining and renewing the transport network and its infrastructure to increase resilience. • Managing movement on the transport network, changing travel behaviour and informing people’s travel choices in dynamic ways to increase efficiency and sustainability. • Improving sustainable and accessible transport infrastructure, connections, information and options to link people with places and communities, and provide a safer and more attractive environment
Noise Action Plan Brighton Agglomeration (DEFRA) 2010	<p>Identifies priority areas for action, based on the Defra Noise Mapping exercise. Predicts that households most effected by traffic noise are those closest to London Road, Lewes Road and the seafront.</p>	<p>To consider noise impacts on the siting of new development and support initiatives to reduce noise nuisance.</p>

Climate Change and Flooding

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
Kyoto Protocol to the United Nations Framework Convention on Climate Change Dec-97	<p>Sets legally binding measures to achieve reductions in greenhouse gas emissions, in particular, to limit the emissions of six greenhouse gases (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride).</p> <p>The UK has a Kyoto target to reduce emissions by 12.5% below base year levels (1990 for the 3 major gases – CO₂, methane and NO_x) by 2008-2012.</p>	To support reduction in greenhouse gas emissions.
Renewable Energy Directive 2009/28/ec	Directive forms part of the EU's 2020 Climate Change Package, requires the UK to increase its consumption of energy from renewable sources to 15% of its gross energy consumption by 2020 (the target for the EU as a whole being set at 20%).	To promote the use of renewable energy technologies.
Energy Efficiency Directive (2012/27/EU)	This Directive establishes a common framework of measures for the promotion of energy efficiency within the EU in order to ensure the achievement of the EUs target on energy efficiency.	Key requirement is to deliver the EUs 20% headline target on energy efficiency by 2020. The Directive contains a number of measures designed to deliver energy savings across all sectors , from overall national energy efficiency targets to the setting of energy efficiency obligations on energy companies
EU Flood Risk Directive (2007/60/EC)	The purpose of the Directive is to establish a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health , the environment, cultural heritage and economic activity associated with floods in the Community.	<p>To assess and manage the risk of flooding: Key articles refer to the need to:</p> <ul style="list-style-type: none"> • Undertake preliminary flood risk assessment; • Prepare flood hazard maps and flood risk maps; • Prepare flood management plans.
National		
Energy Act 2011	<p>Sets out the government's energy strategy to respond to changing circumstances, address long term energy challenges and deliver 4 goals:</p> <ul style="list-style-type: none"> To work towards cutting CO₂ emissions by 60% by 2050; To maintain reliability of energy supplies; To promote competitive markets; To ensure every home is adequately and affordably heated. 	
Renewable Energy Strategy DECC 2009	The Strategy sets out how the government intends to reach the target of ensuring 15% of our energy comes from renewable sources by 2020: almost a seven-fold increase in the share of renewables in just over a decade. It states that the planning system must enable renewable energy deployment in appropriate places at the right time.	<p>Suggested targets include:</p> <ul style="list-style-type: none"> 30% of electricity generated from renewables; 12% of heat generated from renewables; 10% of transport energy from renewables. <p>Plan should contribute to ensuring an increase in the use of renewable energy.</p>
Climate Change Act HMSO 2008	<p>Establishes a long-term legal framework to underpin the UK's action on tackling climate change. Key provisions include:</p> <ul style="list-style-type: none"> - CO₂ emissions reduction targets of 80% by 	To contribute towards improving carbon management , to help the transition to a low carbon economy and to achieve the UK's carbon

	<p>2050, and 26% by 2020, against a 1990 baseline</p> <p>- A system of legally binding five year “carbon budgets”, set at least 15 years ahead.</p>	<p>reduction targets of achieving at least an 80% reduction of CO2 emission by 2050.</p>
<p>The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)</p>	<p>A climate-ready society will understand where and when to take the necessary action to minimise climate impacts and the effects of extreme weather events. Buildings and infrastructure, health and emergency services, the natural environment, businesses and the agriculture and forestry sectors will be resilient to the risks and ready to maximise the opportunities.</p>	<p>Objectives of this programme include:</p> <ul style="list-style-type: none"> • Increasing awareness • Increasing resilience to current extremes • Taking timely action for long-lead time measures
<p>The Flood and Water Management Act: 2010 HMSO 2010</p>	<p>Provides for a better more comprehensive management of flood risk for people, homes and businesses. Protects water supplies to the consumer.</p>	<p>Take into consideration local Flood Risk Assessments and Flood Risk Strategies developed. Direct development away from areas of flood risk and ensure flood risk elsewhere is not increased as a result.</p>
<p>The National Flood and Coastal Erosion Risk Management Strategy for England (Defra and Environment Agency, 2011)</p>	<p>The strategy describes what needs to be done by all organisations involved in flood and coastal erosion risk management. The strategy sets out a statutory framework that will help communities, the public sector and other organisations to work together to manage flood and coastal erosion risk. It will support local decision making and engagement, making sure that risks are managed in a coordinated way across catchments and along each stretch of coast. This includes the development of local flood risk management strategies by lead local flood authorities, as well as our strategic overview of all sources of flooding and coastal erosion.</p>	<p>Some of the objectives of the strategy are to:</p> <ul style="list-style-type: none"> • Know when and where flooding and coastal erosion is likely to happen. • Make sure that any flood and coastal risk management plans use the most up-to-date information and raise awareness of these risks among affected communities. • Reduce the chance of harm to people and damage to the economy, environment and society by building, maintaining and improving flood and coastal erosion. • Help communities understand the risks and take action to manage them or reduce the consequences. • Avoid inappropriate development in areas of flood and coastal erosion risk.
<p>National Planning Policy Framework (CLG, 2012)</p>	<p>The NPPF highlights a number of roles that planning should perform including mitigating and adapting to climate change including moving to a low carbon economy, and taking account of flood risk and coastal change.</p>	<p>Key requirements include:</p> <ul style="list-style-type: none"> • Planning for new development in locations and ways to reduce GHG emissions • Actively supporting energy efficiency improvements to existing buildings • Setting local requirements for building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy • Positively promoting renewable energy technologies and considering identifying suitable areas for their construction

		<ul style="list-style-type: none"> • Encouraging those transport solutions that support reductions in GHG emissions and reduce congestion • Direct development away from areas of high flood risk, and where necessary make it safe without increasing flood risk elsewhere • Incorporate suitable adaptation measures such as green infrastructure • Avoid development in areas vulnerable to physical changes to the coast • Take account of UK Marine Policy Statement and any relevant Marine Plans.
Regional/Local		
City Sustainability Action Plan (2015)	<p>The Action Plan presents a broad set of actions being delivered across the city to support sustainability. The Action Plan is based on the 10 principles of the One Planet framework:</p> <ul style="list-style-type: none"> • Zero Carbon • Zero Waste • Sustainable Transport • Sustainable Materials • Local and Sustainable Food • Sustainable Water • Land Use & Wildlife • Culture & Community • Equity and local economy • Health & happiness 	<p>Within the section on zero carbon, the action plan focuses on radical carbon reductions and improved energy efficiency in existing buildings, zero carbon new build and renewable energy generation. Some objectives include:</p> <ul style="list-style-type: none"> • Energy efficiency and Low and Zero Carbon technology is promoted in new buildings and all existing buildings, where practically and economically feasible. • The energy hierarchy (demand reduction, energy efficiency, renewable energy) is applied to all areas of energy consumption. • City CO₂ Reduction Plan to be created to achieve net zero carbon e.g. covering projects such as district heating. • Support schools in making their buildings more energy efficient. • Enable residents to avoid fuel poverty through sourcing affordable energy. <p>Within the section on Sustainable Water the action plan aims to reduce flood risk including:</p> <ul style="list-style-type: none"> • Reduce flood risk to homes vulnerable to surface water flooding. • Slow water entering the drainage network to reduce flooding. • Reduce flood risk to sites at risk from groundwater flooding.
Sustainable Community Strategy (2014)	<p>The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals:</p>	<p>Under the theme of Living Within Environmental Limits & Enhancing the Environment, there are 5 further</p>

	<ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability <p>There are then 9 further themes each delivered by a partnership approach covering the various issues.</p>	<p>topics which include: cutting greenhouse gas emissions and adapting to climate change. This includes targets relating to improving energy efficiency, support a low carbon economy, promote the use of renewables, promote low carbon transport; reducing the risk of surface water flooding to vulnerable homes, and reducing the risk of flooding from groundwater.</p>
Climate Change Strategy BHCC 2011	<p>The Strategy focuses efforts towards reducing greenhouse gas emissions and adapting to a changing climate. It brings together work that is already being done in the city from existing work programmes, such as the LTP, Food Strategy and City Plan. It has five high level outcomes and sets out steps on how to achieve them:</p> <ul style="list-style-type: none"> • A low carbon economy • Low carbon homes and buildings • Low carbon transport • Renewable and Sustainable energy resources • A city adapting well to climate change 	<p>To help to support achieving the outcomes set out in the strategy of reducing greenhouse gases and enabling adaptation to future climate changes.</p>
Renewable & Sustainable Energy Study AECOM 2012	<p>Assesses opportunities for carbon reduction in the city. Makes recommendations relating to areas with potential for renewable/low-carbon energy infrastructure. Recognises to achieve carbon reductions, retrofitting existing building stock will be required, as well as provision of decentralised energy schemes.</p>	<p>To facilitate/enable recommendations of the study to be delivered e.g.</p> <ul style="list-style-type: none"> • allocating sites for essential energy infrastructure • ensuring any energy infrastructure can be supported by/used by development • supporting the provision of decentralised energy schemes
Shoreline Management Plan – Beachy Head to Selsey Bill First Review South Downs Coastal Group 2006	<p>The Plan defines the risk of people and the developed historic and natural environment of coastal evolution over the next century. It identifies preferred policies for managing risks; identifies consequences of implementing the preferred policies. It informs of the risk of coastal evolution and how this should be considered by future development.</p>	<p>To consider the risks of evolution of the coastline.</p>
Brighton Marina to River Adur Strategy 2012	<p>The strategy identifies and appraises options for the management of this area of coastline. The preferred strategic approach for the Strategy is for Improve (0.5 % AEP) for Units 1 and 2 (Shoreham Locks and Open Coast), with Sustain in Unit 3 (Brighton Marina). These recommendations are in agreement with the preferred Hold the Line policy outlined in the SMP.</p>	<p>To take into consideration the conclusions of the strategy.</p>
Brighton Marina to Saltdean Strategy 2001	<p>Brighton to Saltdean Strategy Study provides a strategic framework of preferred policies for the coastal defence of the study area over the next 50 years, i.e. up to the year 2051. The Study concludes that “Hold the Line” (i.e. to maintain the coastal defences on the current line), in order to protect the infrastructure and the</p>	<p>To take into consideration the conclusions of the strategy.</p>

	existing urban development) is the appropriate policy option for this section of coastline.	
Brighton & Hove Strategic Flood Risk Assessment update JBA Consulting 2012	Updates the 2008 report and provides further detail on additional sources of flooding, including maps for surface water flood risk and detailed assessments of City Plan Development Areas.	The Assessment concludes that there are different potential sources of flooding in the city: groundwater, surface water and tidal. These will need to be taken into consideration.
BH Surface Water Management Plan (2013)	To manage the risk of flooding from surface water in Brighton & Hove. Identifies 7 “hotspots” throughout Brighton & Hove. These areas are included within the SWMP to acknowledge the risk of flooding in these areas. Seven hotspots include: <ul style="list-style-type: none"> • Ovingdean – Ketts Ridge • Moulsecomb Primary School • Bevendean • London Road, Patcham • Mile Oak • Westdene- Carden Avenue/Warmdene Road • Blatchington Mill School 	Should consider findings and support measures to reduce the likelihood of surface water leading to flooding.
BHCC Flood Risk Management Strategy 2015	Sets out local flood risk issues and contains objectives of how to manage the risk including: <ol style="list-style-type: none"> 1) Working with partners 2) Improve evidence base 3) Implement sustainable measures to reduce flood risk 4) Manage development impact through land allocation 5) Raise public awareness and resilience to flooding 6) Inspect, maintain and improve flood defences 7) Implement sustainable health protection measures 	Should consider the findings of the strategy and support in particular to implement measures to reduce flood risk and the management the impact of development through land allocation.

Cultural Heritage, Landscape and Open Space

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)	Development is required to not destroy anything of archaeological value.	<p>Key articles refer to the need to:</p> <ul style="list-style-type: none"> • provide for the maintenance of an inventory of the country's archaeological heritage (article 2i); • provide for archaeological participation in planning policies designed to ensure well-balanced strategies for the protection, conservation and enhancement of sites of archaeological interest (article 5ia); • ensure that in development schemes affecting archaeological sites, sufficient time and resources are allocated for an appropriate scientific study to be made of the site and for its findings to be published (article 5iib)
The European Landscape Convention (2000)	The ELC defines landscape as: 'An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'. It recognises that the quality of all landscapes matters – not just those designated as 'best' or 'most valued'. The ELC promotes the protection, management and planning of European landscape and organises European cooperation on landscape issues	The ELC commits all signatories to establishing and implementing policies aimed at landscape protection, management and planning / integrating landscape into town planning, cultural, environmental, agricultural, social and economic policies. Plans should consider landscape strategies, recognise the value of landscapes and assist in achieving landscape quality objectives
National		
National Parks & Countryside Act 1949 and Environment Act 1990	<p>The 1949 Act makes provision for National Parks. Section 11A, sub-section (2) places specific duty on Local Authorities and other public bodies to have regard to the purposes of the National Park. The Act also specifically states "if it appears that there is a conflict between those purposes, (the local authority) shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park."</p> <p>The Environment Act 1990 section 62 amends section 11A of the 1949 Act, however the above duty still remains.</p>	<p>Should protect the National Park and have regard to the purposes of the National Park as follows:</p> <p>Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</p> <p>Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</p> <p>Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.</p>
Government's Statement on the Historic Environment for England (HM Gov, 2010)	Sets out the Governments vision for the historic environment. Calls for those who have power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contributions that it can make to social, economic and cultural life.	<p>Six strategic aims have been set out:</p> <ul style="list-style-type: none"> • Ensure that relevant policy, guidance, and standards across Government emphasise our responsibility to manage England's heritage for present

		<p>and future generations</p> <ul style="list-style-type: none"> • Ensure that all heritage assets are afforded an appropriate and effective level of protection, while allowing, where appropriate, for well managed and intelligent change • Encourage structures, skills and systems at a local level which: promote an early understanding of heritage in the context of development; ensure that local decision makers have access to the expertise they need; and provide sufficiently skilled people to execute proposed changes sensitively and sympathetically. • Promote opportunities to place people and communities at the centre of the designation and management of their local historic environment and to make use of heritage as a focus for learning and community identity at all levels. • Ensure all heritage assets in public ownership meet appropriate standards of care and use while allowing, where appropriate, for well managed and intelligent change. • Seek to promote the role of the historic environment within the Government’s response to climate change and as part of its sustainable development agenda.
<p>National Planning Policy Framework (CLG, 2012)</p>	<p>The NPPF includes guidance on conserving and enhancing the natural environment and the historic environment. It states that great weight should be given to conserving landscape and scenic beauty in National Parks. It seeks to ensure local authorities recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance. The NPPF also includes guidance on promoting healthy communities, which recognises the contribution made by open space and opportunities for sports and recreation.</p>	<p>Key messages include:</p> <ul style="list-style-type: none"> • Protect and enhance valued landscapes. • Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness. • Set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk. • Consider the effects of climate change in the long term,

		<p>including in terms of landscape.</p> <ul style="list-style-type: none"> • Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure. • Access to high quality open spaces and opportunities for sport and recreation can contribution to the health and well-being of communities. • Ensure up to date assessments of open space form basis of local need • Identify opportunities for provision of new open space/sports facilities where required • Protect and enhance public rights of way and access
Conservation Principles, Policies and Guidance (Historic England 2008)	<p>This provides a framework for the sustainable management of the historic environment with 6 key principles: The historic environment is a shared resource. Everyone should be able to participate in sustaining the historic environment. Understanding the significance of places is vital. Significant places should be managed to maintain their value. Decisions about change must be reasonable and transparent. Documenting and learning from decisions is essential.</p>	To increase understanding of the historic environment; to manage and maintain the value of significant places; to ensure everyone has a role in sustaining the historic environment.
Local		
Streets for All - South East English Heritage/DoT 2005	<ul style="list-style-type: none"> • To protect and enhance the quality of streets and public spaces as key components of the historic environment; and • To maintain image, setting and local distinctiveness. 	To protect and improve the quality of the street environment and to maintain locally distinctive areas.
A Strategy for the Conservation of Brighton & Hove's historic built environment BHCC 2015	<p>The Strategy's main objective is to positively manage change within the city's historic environment and to ensure that the available resources are put to best use, having regard to the council's commitments to:</p> <ul style="list-style-type: none"> • the conservation of the city's listed buildings and their settings; • the conservation or enhancement of the character and appearance of the city's designated conservation areas and their settings; • the conservation or enhancement of the city's registered parks and gardens of special historic interest and their settings; • the conservation of designated archaeological assets; • identifying and conserving other, non-designated heritage assets; • reducing the number of heritage assets that are at risk; • maintaining and promoting high quality architecture, streets and openspaces within the 	Should acknowledge existing strategy and seek to protect and manage change within the historic built environment.

	<p>historic areas of the city;</p> <ul style="list-style-type: none"> • mitigating and adapting to the impacts of climate change on the historic environment; • investment in the historic environment for the economic well being of the city as a visitor 	
The Downland Initiative BHCC 2006	The Downland Initiative aims to facilitate change to the farmland surrounding the city so it delivers greater social and environmental benefits.	<p>To support the following aims:</p> <ul style="list-style-type: none"> • Establish a sustainable agricultural system on the Down • Expand the amount of access land adjacent to the urban areas • Achieve improved links between open access land and Rights of Way • Provide for the needs of cyclists and horse riders • Conserve and enhance downland habitats and species • Provide interpretation and publicity strategy to enhance the access experience • Introduce a conservation regime for the Council's many scheduled ancient monuments and other downland features
South Downs Landscape Character Assessment 2011	Identifies various different landscape types within the National Park. Most of the Brighton & Hove part of the SDNP falls within the "Open Downs" typology. It describes how the area has been influenced by urban features.	To recognise that the SDNP is influenced by urban features such as roads, traffic and built development. To take account of the sensitivities, which include visual sensitivities due to its open and elevated nature, and sensitivities resulting from recreational pressure, light pollution and loss of tranquillity resulting from its proximity to urban areas.
South Downs Green Infrastructure Framework Consultation Draft (Jan 2016)	<p>The framework supports the long term planning of green infrastructure.</p> <p>The aims of the framework is to create, protect and enhance a connected network of green and blue spaces; which sustainably meet the needs of local communities and supports the special qualities of the South Downs National Park; by achieving a consensus about the strategic principles for planning, delivery and management of green infrastructure</p>	<p>To recognise the needs and opportunities relating to green infrastructure in order to support economic growth across the area.</p> <p>To recognise it is essential that the area retains and, ideally, enhances the environmental quality which underpins economic growth in the area and also brings about quality of life improvements for residents.</p> <p>To recognise the environmental importance of green infrastructure, in terms of resilience such as reducing flood risk.</p>
Urban Characterisation Study BHCC 2009	Identifies landscape character types, distinct character neighbourhoods and provides an overview of historical development, scale, density and socio-economic characteristics of the city.	Should take account of the findings of the study and the capacity for each area to change.
Public Space, Public Life Study 2008	The study provides an audit of the quality of public space in the city and recommends how it can be improved in the future. It aims to improve the legibility of the city, to enable people to move around easily as well as improving the quality of places to enjoy the city.	Ensure that public space is of high quality that addressed the imbalance of environments being focused on vehicles by designing streets on a human scale with places the rest and enjoy the city's features.

Streetscape Design Guidelines (2010)	Design guidelines to ensure a consistent, co-ordinated and high quality approach to street furniture and surface materials in Brighton & Hove.	To ensure streets are designed, managed and maintained in a way that enables them to maximise their potential value to residents.
Open Space, Sport and Recreation Study PMP for BHCC 2009	Establishes a baseline of the levels of provision and sets standards for quality, quantity and accessibility for different types of open space.	To take account how the need for open space varies across the city.
Open Space Sports and Recreation Study Update JPC for BHCC 2011	Further analysis of open space, including private open space, including scoring the offer of open space on sites and to ascertain suitability for inclusion of sites of open space in the SHLAA. The study found significant variation in provision of open space across some wards, and sub-ward areas, with some having significant shortfalls and some having significant over-supply. The study highlights areas of shortfall for the future population and that innovative ways would need to be found to ensure communities in areas of under-supply can access open space.	To take account how the need for open space varies across the city.
Allotment Strategy 2014-2024 BHCC 2014	The vision of the strategy is to have enjoyable, inclusive, sustainable and affordable allotments for Brighton & Hove.	Key relevant objectives include: 1. Provide an economic way for people to produce good quantities of high quality, locally grown food. 2. Increase the number of people participating in food growing on allotments, so that all sections of the community – particularly the most vulnerable - can enjoy the benefits and fulfill their horticultural potential. 3. Ensure sufficient availability of good quality, accessible land for allotments. 7. Ensure that the allotment sites, alongside the main role of food growing, play a role in conserving the biodiversity of the city contributing to a healthy living environment.
Draft Seafront Strategy BHCC 2012	The Strategy aims to develop the unique character areas of the seafront to create attractive, sustainable, high quality environments for residents, visitors and businesses.	To support delivery of the aims of the strategy which include: <ul style="list-style-type: none"> • increasing opportunities to facilitate active lifestyles; • managing the seafront to ensure it is safe, clean and meets people's needs; • to increase the tourist offer and extend the tourist season; • to achieve a vibrant seafront with a range of independent businesses; • to prioritise the long-term maintenance of the seafront; • to make the best use of key development sites and use

		<p>these as a way of generating local jobs;</p> <ul style="list-style-type: none"> • improve accessibility to and along the seafront.
Food Strategy & Action Plan 2012	<p>The overall vision of the strategy is to have a healthy, sustainable and fair food system for Brighton & Hove. The strategy aims to:</p> <ul style="list-style-type: none"> • reduce the number of people with diet-related ill health • reduce the number of people living in food poverty • strengthen communities by engaging people in communal activities around food • make the city economically resilient and develop skills in a vibrant and sustainable food economy • reduce the amount of waste we produce and make waste a resource • reduce greenhouse gas emissions • respect biodiversity and the limits of our natural resources • ensure that food is at the heart of planning and policy work. 	Local policy should take into account local food issues and contribute towards achieving the aims of the strategy.
A Green Network for Brighton & Hove 2009	The study identifies a green infrastructure network, identifies the locations for delivering areas of new habitat under Biodiversity Action Plan targets and to improve access for people to natural green space. The Green Network study helped identify the Nature Improvement Area which is defined in the City Plan Part 1 Policies Map.	To maximise opportunities to provide green infrastructure and link to the existing green network.
Public Rights of Way Improvement Plan 2007-2017	The Plan identifies the changes to be made to the management and improvement of the local public rights of way network, including public open access land, in order to attain better provision for walkers, cyclists and equestrians. In particular the needs of users with disabilities will be addressed in order to provide access for a wide range of people.	To take into consideration the findings of the study and the aims of helping more people to use and enjoy a better rights of way and open access network and to improve the health and wellbeing of residents and visitors.
Indoor Sports Facilities Plan 2012-2022	<p>A study to assess demand and provision of indoor facilities across the city. Recommended the following in order to address deficiencies:</p> <ol style="list-style-type: none"> 9. To build a new large multi-sports centre 10. Increase the number of community swimming pools 11. Facilitate the opening of a purpose built gymnastics facility 12. Increase levels of community access to existing school facilities 13. Improve the quantity and quality of health and fitness facilities 14. Improve existing athletics facilities including replacement of the track at Withdean 15. Develop Withdean as a multi-sports hub 16. Improve the quality and quantity of artificial grass pitches <p>Recognised demand for an ice-rink</p>	To take into consideration the findings of the study in terms of provision required to meet future needs.
Joint Health &	Has five priority areas:	Should ensure that health

<p>Wellbeing Strategy 2015</p>	<ol style="list-style-type: none"> 1) Reducing inequalities 2) Safe, Happy, Healthy Children, Young People and Families 3) Give every person the chance of living and aging well 4) Develop healthy and sustainable communities and neighbourhoods 5) Providing better care through integrated services 	<p>inequalities continue to be tackled through planning for healthy communities and ensuring that planning continues to deliver the wider determinants of health including housing, employment, education and access to health and other services, including sports facilities in order to help improve health. Ensure development is inclusive, adaptable and accessible and promotes active living.</p>
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Population, Health and Inequalities

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
European Health Strategy 'Together for Health: A Strategic Approach for the EU 2008-2013' (2007)	At the community level, ensure that health policy fosters good health, protects citizens from threats and support sustainability.	Three objectives are defined to meet these challenges: <ul style="list-style-type: none"> • Fostering good health in an ageing Europe; • Protecting citizens from health threats; and • Supporting dynamic health systems and new technologies.
National		
NPPF 2012	The NPPF recognises the role the planning system can play in facilitating social interaction and creating healthy, inclusive communities.	Key messages include: <ul style="list-style-type: none"> • Promote opportunities for social interaction • Promote safe and accessible environments • Promote safe and accessible environments containing clear pedestrian routes, public space and active public areas • Deliver social, recreational and cultural services needed by a community • Provide access to open space and opportunities for sports and recreation • Ensure up to date assessments of open space form basis of local need • Identify opportunities for provision of new open space/sports facilities where required • Protect and enhance public rights of way and access
Health & Social Care Act 2012	This Act sets out a new public health system where responsibilities, freedoms and funding will be devolved locally wherever possible. The new public health system will aim to protect and improve the public's health. The Act recognises that health considerations are an important part of planning policy. It also supports planning policy that aligns social, economic, environmental and health priorities in one place.	Improving health must be a key consideration in the work of local government and therefore must be embedded in other areas including planning.
The Marmot Review: Implications for Spatial Planning (The Marmot Review Team, 2011)	The review identifies that there is a social gradient in health: those living in the most deprived neighbourhoods die earlier and spend more time in ill health than those living in the least deprived neighbourhoods. Such health inequalities are determined by social inequalities, including environmental inequalities; there is a gradient in the distribution of environmental disadvantages: those living in the most deprived neighbourhood are more exposed to environmental conditions, which negatively	The review recommends three main actions: <ul style="list-style-type: none"> • Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: improving active travel; improving good quality open and green spaces; improving the quality of food in local areas; and improving the energy efficiency of housing.

	affect health.	<ul style="list-style-type: none"> • Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality. • Support locally developed and evidence- based community regeneration programmes that remove barriers to community participation and action; and reduce social isolation.
Healthy Lives, Healthy People: Our Strategy for Public Health in England (HM Gov, 2010)	Sets out the Governments long-term vision for the future of public health in England. The aim is to create a 'wellness' service and to strengthen both national and local leadership.	<p>Key objectives:</p> <ul style="list-style-type: none"> • Protect the population from serious health threats • Help people live longer, healthier and more fulfilled lives • Improve the health of the poorest, fastest
Equality Act 2010	Consolidates previous equalities legislation, and has extended the general "public sector duty," which now requires the public sector - including planning authorities - to take into account the needs of certain "protected characteristics" when designing and delivering services.	The duty is defined in Section 149 of the Act and requires public bodies to eliminate unlawful discrimination , harassment, victimisation and other conduct prohibited by the Act, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.
Local		
City Sustainability Action Plan 2015	<p>The Action Plan presents a broad set of actions being delivered across the city to support sustainability. The Action Plan is based on the 10 principles of the One Planet framework which includes:</p> <ul style="list-style-type: none"> • Health & happiness 	<p>A key aim of the SAP is to support people to achieve and maintain a healthy life and to reduce health inequalities across the city. Key objectives include:</p> <ul style="list-style-type: none"> • Reduce differences in life expectancies • Improve emotional wellbeing: • Promote active living: • Promote healthy and active ageing • Reduce fuel poverty • Improve health and wellbeing through the workplace
Sustainable Community Strategy (2014)	<p>The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals:</p> <ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability <p>There are then 9 further themes each delivered by a partnership approach covering the various issues.</p>	<p>The aim of the Health & Wellbeing section is for Brighton to be a place where there is a shared vision to improve health, care and wellbeing for everyone living and working in the city and for generations to come, by improving the conditions which influence our health, and by promoting healthy lifestyles, treating illnesses, providing care and support and reducing inequalities in health.</p> <p>The Community section promotes community cohesion which is defined as communities having shared</p>

		<p>values and a strong sense of belonging to Brighton & Hove'. Objectives include:</p> <ul style="list-style-type: none"> • To fully know and understand the city's communities. • To value the diversity of people's backgrounds. • To ensure people have the opportunity for similar life chances and choices. • To supporting strong positive relationships between and within different communities
<p>Strategy to Reduce Health Inequalities in Brighton & Hove Public Health Directorate 2005</p>	<p>In July 2004 Brighton & Hove was designated as a 'Healthy City' by the World Health Organisation, acknowledging the city's strong political and partnership commitment to reduce health inequalities and improve health for everyone. The core objectives of the programme are to:</p> <ul style="list-style-type: none"> • improve and develop services that: provide high quality treatment and standards of care; • focus on prevention and promoting health and well-being; • deliver care in more local settings; and • are flexible, integrated and responsive to people's needs and wishes. 	<p>The programme makes a local requirement to further investigate potential health outcomes and where possible to minimise risk and inequality and maximise health benefits through processes such as HIA.</p>
<p>Joint Strategic Needs Assessment 2013-2015</p>	<p>Health data analysis report to determine the health needs of the local population. 82 themed areas set out in the JSNA. 6 key issues identified as referred to in the Health & Wellbeing Strategy. Identifies the following wider determinants of health as having the greatest health impacts on health & well-being in the city:</p> <ul style="list-style-type: none"> -child poverty -education -employment and unemployment -housing -fuel poverty <p>It identifies the following social issues as having a high impact on health locally:</p> <ul style="list-style-type: none"> - alcohol - healthy weight - domestic and sexual violence - emotional health and well-being - smoking - disability 	<p>To ensure that health inequalities continue to be tackled through planning for healthy communities and ensuring that planning continues to deliver the wider determinants of health including housing, employment, education and access to health and other services in order to help improve health.</p>
<p>Joint Health & Wellbeing Strategy 2015</p>	<p>Has five priority areas:</p> <ol style="list-style-type: none"> 1) Reducing inequalities 2) Safe, Happy, Healthy Children, Young People and Families 3) Give every person the chance or living and aging well 4) Develop healthy and sustainable communities and neighbourhoods 5) Providing better care through integrated services 	<p>Should ensure that health inequalities continue to be tackled through planning for healthy communities and ensuring that planning continues to deliver the wider determinants of health including housing, employment, education and access to health and other services, including sports facilities in order to help improve health. Ensure development is</p>

		inclusive, adaptable and accessible and promotes active living.
Spade to Spoon: Making the Connections - A Food Strategy and Action Plan for Brighton and Hove and update, Dig Deeper 2011 Brighton & Hove Food Partnership 2006 2012	<p>The overall vision of the strategy is to have a healthy, sustainable and fair food system for Brighton & Hove. The strategy aims to:</p> <ul style="list-style-type: none"> • reduce the number of people with diet-related ill health • reduce the number of people living in food poverty • strengthen communities by engaging people in communal activities around food • make the city economically resilient and develop skills in a vibrant and sustainable food economy • reduce the amount of waste we produce and make waste a resource • reduce greenhouse gas emissions • respect biodiversity and the limits of our natural resources • ensure that food is at the heart of planning and policy work. 	Should support the strategy, e.g. through protecting and providing for local food production.
Children & Young People's Plan 2009-2012 BHCC2009	<p>The plan sets out the improvements to the wellbeing of children and young people the local authority intends to make. There are four main issues which the plan tackles:</p> <ul style="list-style-type: none"> • Preventing harm to children and young people • Reducing child poverty and reducing health inequality • Promoting health and wellbeing, inclusion and achievement • Developing the CYPT so it gets the best value for money. 	Should seek to protect and improve health for all members of the community , including tackling health inequalities and promoting equality.
Reducing Inequality Review OCSI and Educe Ltd for BHCC 2008	<p>Aims to inform PSB and LSP on: effectiveness of neighbourhood renewal strategy, options for the future to reduce inequality, and measures of success that could be used for future targets. Found there to be significant barriers to a number of interest groups; found that the city has been less successful in closing the gap between priority neighbourhoods and the city as a whole. Recommendations include tackling worklessness, tackling multiple disadvantage and includes how the planning can help to reduce inequalities</p>	Should take on board the findings of the review and ensure that neighbourhoods include the services, infrastructure and jobs required to support a reduction in inequalities.
Annual Report of the Director of Public Health: Look Inequality (2015)	<p>Report addressing the subject of inequality across various topics all of which effect health including: housing, education, employment, income, welfare, crime, the environment, and food. The study concludes that that has been some improvement in some areas but others including income, welfare reform, housing, secondary education and food poverty remaining challenging.</p>	Planning has a wider role in the need for a coordinated approach across the city to tackling inequalities. Strategies to tackle inequalities need to include actions across various issues, as a single issue approach will not achieve outcomes.

Housing

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
National		
NPPF 2012	<p>Planning should support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.</p>	<p>Key paragraphs include: To plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; Where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Bring back into residential use empty housing and buildings. LPAs should plan positively for the development and infrastructure needs of their area; allocate sites to promote development, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.</p>
Housing & Planning Bill 2016	<p>Proposes a number of measures to tackle the housing crises including: Planning Permission in Principle to boost certainty for developers; Requires LPAs to compile and maintain a register of brownfield land suitable for housing; Requires a proportion of "starter homes" to be delivered on all suitably sized sites; Also gives the Communities Secretary and SoS greater powers in relation to plan-making and neighbourhood plans.</p>	<p>Will need to consider implications of requirements of the Bill following its subsequent enactment.</p>
Planning Policy for Traveller Sites (CLG, 2012)	<p>Government's planning policy for traveller sites which aims to:</p> <ul style="list-style-type: none"> • Ensure LPAs make own assessment of need • Work collaboratively to meet need through identification of land including setting pitch and plot targets • Plan for sites over a reasonable timescale 	<p>Allocate sufficient pitches and plots to meet need and a rolling five-year supply of deliverable sites.</p>

	<ul style="list-style-type: none"> • Promote more private traveller site provision • Reduce number of unauthorised developments • Ensure accessibility to services and facilities 	
Local		
BH Housing Strategy 2015	<p>Overall aim to ensure the right amount of housing to meet the needs of local people with appropriate support to those who need it. Three priorities:</p> <p>Priority 1: Improving Housing Supply</p> <ul style="list-style-type: none"> • New Affordable Housing • Family Housing • Community Housing Sector • Student Housing <p>Priority 2: Improving Housing Quality</p> <ul style="list-style-type: none"> • Decent Warm & Healthy Homes • Empty Homes • Private Rented Sector • Houses in Multiple Occupation (HMO) <p>Priority 3: Improving Housing Support</p> <ul style="list-style-type: none"> • Homelessness Prevention • Housing Related Support • Supporting Older People • Supporting our Black & Minority Ethnic (BME) Communities • Supporting our Lesbian, Gay, Bisexual & Trans* (LGBT) Communities <p>There are a range of other strategies that fall under the Housing Strategy, e.g. Student Housing, Empty Homes Strategy and so on.</p>	<p>Key objectives:</p> <ul style="list-style-type: none"> • To improve housing supply to make sure the city has the right type of housing to meet the needs of residents; • To improve quality of housing so that residents are able to live in decent homes suitable for their needs; and • To improve housing support to make sure residents are supported to maintain and increase their independence.
Homelessness Strategy 2014-2019	<p>The vision of the strategy is: “To prevent homelessness through early intervention, and the timely provision of advice and support. When homelessness is unavoidable, to ensure that people receive appropriate housing, care and support, with a clear pathway towards living independently.”</p>	<p>The strategy has specific objectives for different groups of people, and falls under the overarching Housing Strategy aims of:</p> <ul style="list-style-type: none"> • Improve supply • Improve quality • Improve support
Traveller Commissioning Strategy 2012	<p>The strategy hopes to tackle the fundamental inequalities Travellers face and the issues caused by the shortage of suitable stopping places. The vision is to “Balance the needs of Traveller communities and the City’s settled communities to reduce inequality and improve community relations”</p>	<p>The strategy seeks to achieve the following outcomes:</p> <ul style="list-style-type: none"> • Improve site availability • Improve health, safety and wellbeing • Improve education outcomes • Improve community cohesion
Sustainable Community Strategy 2014	<p>The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals:</p> <ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability <p>There are then 9 further themes each delivered by a partnership approach covering the various issues.</p>	<p>The aims of the Housing & Affordability theme is for “Brighton & Hove to be an inclusive city with affordable, high quality, housing that supports a thriving economy by offering security, promoting health and wellbeing and reduces its impact on the environment. We want to help bring about integrated communities in a society that values everyone to recognise and tackle the inequality faced by families, the poor and the vulnerable.”</p> <p>The aims further reflect those of the Housing Strategy to</p>

		<ul style="list-style-type: none"> • Improve supply • Improve quality • Improve support
Objectively Assessed Need for Housing (2015)	<p>2015 OAN Study (GL Hearn) undertaken for City Plan Part 1 provides most recent assessment of housing needs for Brighton & Hove. Assessment concludes OAN is 30,120 dwellings (2010-2030), and affordable housing need of 2,105 dwellings per annum.</p> <p>It also indicates need for more family sized housing and also provides need figure for C2 Residential Institutions.</p> <ul style="list-style-type: none"> • For market housing, the majority of demand is likely to be for two and three bedroom homes (approximately 70%) but that there is also a notable need for both 1bed (14%) and for 4 bed (15%) homes. Based on the evidence and analysis of existing stock, the study recommends the focus of market housing to be on two and three-bed properties. This reflects continuing demand from younger households young families and also from older households downsizing. • For affordable housing, the majority of demand is likely to be for 1and 2 bed properties (82%) but also notes smaller properties typically offer limited flexibility in accommodating changing requirements of households, whilst delivery of larger properties can help to meet the needs of households in high priority and to manage the housing stock by releasing supply of smaller properties. • For Specialist housing for older people, the study indicates a potential need for an additional 1,288 units which equates to about 64 dwellings per annum (C3 use class – sheltered, extra care, age specific, type products) • Registered care provision (C2) – study notes there may be no case to increase this type of provision. However, there may be additional need for particular groups such as those requiring specialist nursing or for people with dementia. • Analysis suggests a small surplus of Registered Care accommodation in the city and that there will still be a surplus in 2030. 	<p>Set within the context of the adopted City Plan which sets a housing target of 13,200 dwellings over the plan period, the plan should aim to maximise housing supply in order to help contribute towards the OAN. To consider the findings of the study particularly with regards to the specific housing needs.</p>
Urban Fringe Assessments 2014 and 2015	<p>2014 study carried out a high level assessment of suitability and capacity of urban fringe sites to provide housing development. Study indicated that, subject to further testing, approximately 1,200 houses could be provided across some of the urban fringe sites.</p> <p>2015 study carried out further detailed landscape, ecological and archaeological testing of some of the more sensitive sites, in order to inform site</p>	<p>To take into consideration the findings of the studies when making site allocations.</p>

	boundaries.	
Student Accommodation Study (2016)		

Local Economy, Employment, Skills and Education

Evidence Source	Key Messages	Key Sustainability Objectives and implications for the Plan
International		
Europe 2020	The European Union's ten- year growth strategy. It is about addressing the shortcomings of our growth model and creating the conditions for a different type of growth that is smarter, more sustainable and more inclusive.	The 5 targets for the EU in 2020: 1. Employment • 75% of the 20-64 year-olds to be employed 2. R&D • 3% of the EU's GDP to be invested in R&D • Climate change and energy sustainability • greenhouse gas emissions 20% (or even 30%, if the conditions are right) lower than 1990 • 20% of energy from renewables • 20% increase in energy efficiency 4. Education • Reducing the rates of early school leaving below 10% • at least 40% of 30-34-year-olds completing third level education 5. Fighting poverty and social exclusion • at least 20 million fewer people in or at risk of poverty and social exclusion
National		
Fixing the Foundations: Creating a more prosperous nation (HM Treasury) (2015)	The Government's plan to increase productivity. Aims of relevance include: 3) A highly Skilled Workforce 4) Leading Universities 5) A modern transport system 6) Reliable and low-carbon energy 7) World-class digital infrastructure 8) High quality science and innovation 9) Planning freedoms and more houses to buy 10) A higher pay, lower welfare society 11) More people with a chance to work and progress	
The Plan for Growth (HM Treasury and BIS, 2011)	This is the Government's plan to create a more productive country so we can be a leading high tech, highly skilled economy. The Plan for Growth contains four overarching ambitions that will ensure the progress is made towards achieving this economic objective. The ambitions are: 1. to create the most competitive tax system in the G20; 2. to make the UK one of the best places in Europe to start, finance and grow a business; 3. to encourage investment and exports as a route to a more balanced economy; and 4. to create a more educated workforce that is the most flexible in Europe.	Some of the actions include: • Changes to the planning system to support job creation by introducing; opening up more land for development, while retaining existing controls on greenbelt land; consulting on the liberalisation of use classes; and ensuring all planning applications and appeals will be processed in 12 months and major infrastructure projects will be fast-tracked; • Support for investment across the regions by setting up 21 new Enterprise Zones with superfast broadband, lower

		<p>taxes and low levels of regulation and planning controls, to be developed with the new Local Enterprise Partnerships, and with all business rates receipts to be held locally;</p> <ul style="list-style-type: none"> • Promote labour mobility by boosting the supply of housing through support for the house-building industry
NPPF 2012	<p>NPPF recognises there are three dimensions to sustainable development: economic, social and environmental none of which should be taken in isolation.</p> <p>The Government is committed to ensuring economic growth in order to create jobs and prosperity. The Government is committed to ensuring the planning system does everything it can to support sustainable economic growth.</p>	<ul style="list-style-type: none"> • Encourage sustainable economic growth • Proactively meet the development needs of business • Identify strategic sites to meet anticipated needs • Support existing business sectors and identify emerging sectors • Plan positively for knowledge, creative and digital clusters • Facilitate flexible working • Avoid long term protection of employment sites unlikely to come forward and regularly review allocations • Recognise town centres as the heart of communities • Define a network and hierarchy of town centres • Define the extent of town centres and primary shopping areas • Promote competitive town centres • Retain and enhance existing markets • Allocate sites to meet scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres • Allocate appropriate edge of centre sites for town centre uses • Set policies for consideration of proposals for main town centre uses which cannot be accommodated in town centres • Plan positively for town centres in decline
Regional / Local		
Regional Economic Strategy for South East England 2006 – 2016	<p>The strategy aims to achieve sustainable economic prosperity for all. It includes a number of priorities:</p> <p>Competitive businesses: a dynamic, diverse and knowledge-based economy that excels in innovation and turning ideas into wealth creating</p>	<p>To reflect the aims of the strategy including, improving the knowledge-based economy, increasing skills, increasing job opportunities, reducing crime, provision of infrastructure and</p>

SEEDA 2006	<p>enterprise; Successful people: a skilled, motivated, inclusive and highly productive workforce that anticipates and embraces change; Vibrant communities: an inclusive society characterised by strong, diverse and healthy communities enjoying ready access to high quality jobs, education, homes, health and other services, and free from high levels of crime and discrimination; Effective infrastructure: transport, communications housing and health infrastructures that support and enable continued economic growth and improved quality of life for all; Sustainable use of natural resources: environmentally efficient businesses and high quality development demonstrating that quality of the environment is a key asset that underpins economic success; and Support for sector and cluster development focusing on sectors driven by new and emerging technologies with transform</p>	<p>support for new and emerging business clusters whilst protecting the environment.</p>
Coast to Capital: Strategic Economic Plan: Skills for Growth 2014	<p>Aims to encourage growth across the Coast to Capital region, through targeted investment in infrastructure and innovation, as well as supporting Coast to Capital's thriving business base. There are three main priorities:</p> <ul style="list-style-type: none"> • Enhance business support and skills • Accelerate research and innovation • Invest in transport, flood defences and resilience <p>The SEP formed the basis for the Growth Deal.</p>	<p>Through investment, aims to create:</p> <ul style="list-style-type: none"> • 60,000 New Jobs • 26,000 Additional Homes • 970,000 Square metres of New Employment Space <p>There are six main priority areas:</p> <ol style="list-style-type: none"> 1. Successful Growth Locations, including transport investment 2. Successful Businesses - support business investment in growth and create the conditions for enterprise to flourish 3. Building Competitive Advantage - back investment and development where we can lead nationally and internationally 4. Skills and Workforce - encouraging employers to invest more and making the most of our talent 5. Growth is Digital - ensuring digital infrastructure is fit to drive growth 6. Housing and infrastructure - Develop sustainable communities and invest in strategic infrastructure to unlock growth
Coastal West Sussex and Greater Brighton Local Strategic Statement for Delivering Sustainable Growth 2015-2031	<p>The updated LSS replaces the 2013-2013 strategy and includes Horsham and Mid Sussex as well as Lewes, Brighton & Hove, Adur, Worthing, Arun and Chichester. The LSS focuses on the strategic issues shared across the Coastal West Sussex and Greater Brighton area that will impact on the long term sustainability of the area. The Strategic Objectives, Spatial Priorities have been updated as well as sections on implementation to ensure that ambitions are delivered within timeframes.</p>	<p>Strategic Objectives:</p> <ol style="list-style-type: none"> 1: Delivering sustainable economic growth 2: Meeting strategic housing needs 3: Investing in infrastructure 4: Managing environmental assets and natural resources <p>Spatial priorities include:</p> <ol style="list-style-type: none"> 1: Shoreham harbour and Brighton airport, Shoreham

<p>Brighton & Hove Economic Strategy 2013-2018 Economic Partnership and BHCC 2008</p>	<p>A Strategy to set BH on the path to a resilient low carbon economy, known for its creative, digital and information technology businesses and growing environmental industries, supported by sustainable city infrastructure.</p> <p>Strategic Objectives include:</p> <ul style="list-style-type: none"> • To enhance BH distinctive lifestyle and destination offer. • To grow quality jobs and business opportunities in high value and low carbon sectors. • To better align job skills to projected need and in support of higher value sectors. • To tackle barriers to employment and create opportunities for all. • To establish a strong and influential Greater Brighton City Region 	<p>5: Greater Brighton city region 6. Brighton Seafront and City Centre</p> <p>Some goals include:</p> <ul style="list-style-type: none"> • Growth in all sectors • Thriving year round visitor economy • Increase in corporate companies as well as independents • Iconic developments and a stretched seafront offer • Internationally recognised for environmental industries • Business involved in reducing carbon footprint • Improved survival rate of new business • SME construction sector involved in local retrofitting • Modernised office space • Business investment location due to highly skilled workforce • Greater range of employment opportunities with lower unemployment • Less people employed in jobs below their qualification level • Increased educational attainment • Improved schools and educational facilities • Less people living in poverty and support for those wishing to enter the labour market
<p>Sustainable Community Strategy 2014</p>	<p>The SCS overarching aims are to increase equality and improve engagement. There are five principles to help achieve these goals:</p> <ul style="list-style-type: none"> • economy • children & young people • health & wellbeing • community safety & resilience • environmental sustainability <p>There are then 9 further themes each delivered by a partnership approach covering the various issues.</p> <p>The economy principle and aims is linked strongly to the Economic Strategy.</p>	<p>The aims of the “Enterprise” theme is to create a resilient low carbon economy, known for its creative, digital, information technology businesses, growing environmental industries & services and to be supported by a more sustainable city infrastructure. To be a City that is a vibrant, socially and culturally diverse place with a wide range of job opportunities supported by accessible child care. Specific aims include:</p> <ul style="list-style-type: none"> • Reduce unemployment • Increase skills • Encourage higher-value jobs • Secure the city’s conference economy • Recognise the value of the SDNP in relation to eco-tourism • Protect and nurture the cultural and creative sector

		<p>The aims of the “Learning” theme is to be a city that actively promotes learning and training opportunities for people of all ages, ensuring that our current and future citizens have the skills, knowledge and experiences that will help them to be successful and happy so that they can actively contribute to the future growth of the city. Specific aims include:</p> <ul style="list-style-type: none"> • Raise achievement of vulnerable groups across the city • Develop new secondary education provision to meet an additional 300 students by 2020 • Secure sufficient suitable 16 – 19 education and training provision
City Sustainability Action Plan 2015	<p>The Action Plan presents a broad set of actions being delivered across the city to support sustainability. The Action Plan is based on the 10 principles of the One Planet framework which includes:</p> <ul style="list-style-type: none"> • Equity and Economy 	<p>The aim is to create an economy that supports equity and diverse local employment. Some objectives include:</p> <p>Increase the number of businesses paying the living wage To support entrepreneurial behaviour e.g. through incubation, low-rent or temporary spaces To improve access to employment and bridge the skills gap Identify strategic barriers to growth of key industries Promote the benefits of a local food economy</p>
Creative Industries in Brighton and Hove Report and Strategy BHCC2000	<p>To recognise the central role that the creative industries play in the local economy, impact on the image and identity of the city and contribution to regeneration and attraction of inward investment and tourism. Aims include:</p> <ul style="list-style-type: none"> • Providing leadership & co-ordination; • Marketing the Brighton brand; • Supporting Innovation and research; • Education & Training for the Knowledge Economy; • Meeting the Business Support needs of the sector; and • Engaging the sector in the regeneration & design of the city. 	<p>To support growth of the creative industries sector.</p>
City Employment and Skills Plan (2011-2014) (BHCC) Nb	<p>To support creation of at least 6,000 new jobs in Brighton & Hove by 2104. The CESP recognises that just creating jobs will not achieve this goal. The city needs to not only set the conditions for job creation but also do more to equip local residents to compete for work within the city’s labour market.</p>	<p>Three main priorities:</p> <ol style="list-style-type: none"> 1: Promote the city’s employment and skills needs to internal and external partners and agencies. 2: Support the creation of at least 6,000 new jobs by 2014. 3: Ensure that local residents are equipped to compete for jobs in the city’s labour market.
Emerging City Employment &	<p>Likely to contain the following priorities:</p> <ul style="list-style-type: none"> • Establishing an Employer Skills Task 	<p>Consider priorities to support the local economy.</p>

<p>Skills Plan 2016-2020</p>	<p>Force to provide the vital business leadership to support both the development and delivery of the new Plan;</p> <ul style="list-style-type: none"> • Exploring new delivery models for boosting the number of apprenticeship opportunities across the city and the Greater Brighton City Region, with a particular focus upon high quality skilled apprenticeships, for 16-24 year olds; • Creating a step change in how the City Council and other public sector bodies creates apprenticeship opportunities as major employers; • Exploring initiatives which aim to eliminate long-term youth unemployment in the city through new ways of working in partnership with the Department for Work and Pensions (DWP), the Skills Funding Agency, the council and the private sector; and • Supporting those marginalised from the labour market into jobs. 	
<p>Employment Land Study NLP for BHCC 2012</p>	<p>Audit of existing employment estates; assessed demand and supply of employment land; appraised quality of existing sites. Recommended a revised target for employment land for different uses, including a requirement for industrial floorspace.</p>	<p>Should take into account findings of the Employment Land Study.</p>
<p>A Refreshed Visitor Strategy 2008-2018 BHCC 2008</p>	<p>In 2018, Brighton & Hove City will be a destination where the needs of visitor, the tourism industry, the community and the environment are in complete balance and consequently will make a significant contribution to improving the quality of life for local people. The tourism industry will help to improve the environment if the city and the wellbeing of its people making it a better place in which to live and visit. The vision for the city is to be a sustainable destination where: Visitors are welcome The Industry is profitable The Community benefits The Environment is enhanced</p>	<p>Four key objectives: A. Investment in Infrastructure and Physical Environment B. Promote Sustainable & Responsible Tourism C. Improving Quality & Raising Standards D. Partnership & Consultation</p>
<p>Retail Study Update BH 2011</p>	<p>Provides an assessment of current and future capacity for retail based development. Concludes there is an over-supply of capacity for convenience floorspace by 2030; recommended that Brighton Marina district centre is de-designated and to extend the prime frontage of the Regional Shopping Centre to include the redevelopment of the Brighton Centre.</p>	<p>Should take into account findings of Study.</p>
<p>BH Schools Organisation Plan 2013-2018</p>	<p>The council seeks to ensure that all children and young people in the city have access to high quality education that will provide them with the knowledge and skills to secure employment and be active and responsible citizens. The SOP outlines how the council will secure sufficient school places for all its children and young people.</p>	<p>Specific aims include:</p> <ul style="list-style-type: none"> • to ensure that children are able to attend a local school • to look to expand schools which are popular and deliver good education • to work in partnership with other key agencies, including

		the Anglican and Catholic Dioceses and the Education Funding Agency, in developing proposals to meet the need for new school places
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Appendix B SA Framework, Indicators and Baseline Information

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
Environmental			
1. To protect, conserve and achieve a net gain in biodiversity	<ul style="list-style-type: none"> Protect and enhance international and national designated sites (e.g. SAC, SSSI, NNR, RIGS). Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species. Protect and prevent the loss of irreplaceable habitats such as Ancient Woodland. Increase understanding and access to biodiversity/nature for local people. Provide opportunities to achieve a net gain in biodiversity Recognise the multi-functional benefits of ecosystem services provided by biodiversity and green infrastructure Improve links between existing and/or new biodiversity and the Green Network/Nature Improvement Area 	<ul style="list-style-type: none"> Reported condition of international/national sites (% of area) Area (ha) of sites subject to nature conservation designations SQM habitat features added/lost Number and percentage of sites where positive conservation management is being or has been implemented in the last five years. 	<ul style="list-style-type: none"> Castle Hill SAC: 43% favourable, 57% unfavourable recovering (2009-2015) Marina to Newhaven Cliffs: 91% favourable, 9% unfavourable recovering (2014) SAC/SSSI: 71.2ha (2 sites) LNR/PLNR: 690ha (8 sites) LWS/SNCI: 578ha (62 sites) New Residential Developments in 2014/15 provided: 7.8 m² Open Water, 1109 m² Chalk/flower rich grassland, 200 m² Other (195 m² Green Wall/ 5 m² Reptile Hibernacula/refugia) 50% of local sites were in positive conservation management (2013/14)
2. To protect and improve open space and green infrastructure and improve sustainable access to it	<ul style="list-style-type: none"> Contribute to meeting the city's open space, sports and recreation requirements Improve the quality or make better use of existing open space Replace existing open space with 	<ul style="list-style-type: none"> Amount and type of open space/1,000 population Area of open space created or lost as a result of development Number of people on waiting list for an allotment 	<ul style="list-style-type: none"> 2.8ha/1,000 natural/semi-natural 0.047ha/1,000 children's & YP 0.92ha/1,000 parks & gardens

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	<ul style="list-style-type: none"> • improved quality or quantity • Improve sustainable access to existing or new open space • Increase opportunities for use of open spaces, including the seafront • Protect and enhance public rights of way • Encourage the incorporation/creation of various types of open space within development 	<ul style="list-style-type: none"> • Amount of all developer contributions/CIL provided towards open space enhancement/ improvement 	<ul style="list-style-type: none"> • 0.59ha/1,000 amenity • 0.23ha/1,000 allotments (all 2009) • New residential developments submitting a SC in 2014/15 created 1,945m2 open space • 1,265 people on waiting list for an allotment (2016) • £401,611 collected in 2013/14
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	<ul style="list-style-type: none"> • Protect the landscape character and special characteristics of the SDNP and its setting • Protect and enhance important views to and from the SDNP • Encourage sustainable access to the SDNP • Promote sustainable tourism to the SDNP • Limit the impact of light pollution on the SDNP • Protect and enhance public rights of way 	<ul style="list-style-type: none"> • Number of applications permitted contrary to comments received by the SDNPA • Number of sustainable routes available to access the SDNP • Number of applications within BH refused on landscape grounds 	<ul style="list-style-type: none"> • No consents granted (2014/2015) • There are 33 bus routes that run from Brighton & Hove covering access to various points and towns in the Downs • Data not available
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and	<ul style="list-style-type: none"> • Protect, conserve and enhance listed buildings, historic parks & gardens, conservation areas and scheduled ancient monuments and their settings. • Take account of assets on the Local List • Recognise the potential for undesignated archaeological assets. • Support the integration of new 	<ul style="list-style-type: none"> • Number of Listed Buildings • Number and % of Listed Buildings on Historic England at risk register • Number and % of Conservation Areas on Historic England at risk register • Number of Conservation Areas 	<ul style="list-style-type: none"> • 479 Listed Buildings • 9 LB (1.9%) on at risk register (2016) • 6 CA (17%) on at risk register (2016) • No CA de-designated (2014/15) • 11.8% of CA: loss of detail

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
archaeological sites	<p>development into the built and historic environment</p> <ul style="list-style-type: none"> • Respect, maintain and strengthen local character and distinctiveness • Promote high quality design that establishes a strong sense of place • Take into account the existing character of adjacent communities and neighbourhoods. 	<p>de-designated, or parts, as a result of loss of historic or architectural detail</p> <ul style="list-style-type: none"> • % of Conservation Areas where the loss of historic detail is considered to be significant or very significant 	<p>significant/very significant (2014/2015)</p>
5. To reduce the need to travel, encourage sustainable modes of travel and improve travel choice	<ul style="list-style-type: none"> • Encourage mixed-use development and sustainable communities that reduce the need to travel • Encourage the location of development close to where use of sustainable transport can be maximised • Improve public and sustainable transport infrastructure including links and access • Encourage health-beneficial forms of transport including cycling and walking • Promote low-carbon forms of transport • Improve road safety to encourage cycling and walking • Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations • Protect and enhance public rights of way 	<ul style="list-style-type: none"> • Car ownership/household • % households with no car • CO2 emissions from transport (kt/capita) • % residential development with good access to local facilities • % development where cycle parking provided • % residents who travel to work by bus, cycle, on foot, by train, by car • % housing developments that are car free 	<ul style="list-style-type: none"> • 0.86 cars/household (2011) • 38% households have no car (2011) • 1.1 tonnes/capita (2013) • 96% of the residential applications permitted with a Sustainability Checklist in 2014/15 stated they allowed good, safe and direct access between the development and local facilities (2014/2015) • 92% of the residential applications permitted with a sustainability checklist including cycle parking • Census 2011: 24% bus/train; 37% car; 5% bike; 20% on foot • Data available from 2016
6. To improve air	<ul style="list-style-type: none"> • Minimise the causes of air pollution 	<ul style="list-style-type: none"> • Change in size of AQMA 	<ul style="list-style-type: none"> • 2013 AQMA designation

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
and noise quality	<ul style="list-style-type: none"> Reduce the need to travel Support the development of cleaner technologies (e.g. low-emission vehicles) Take account of Air Quality Management Areas, where relevant. Support measures that reduce road related noise 	<ul style="list-style-type: none"> Annual mean concentration of PM10 at Beaconsfield Road and North Street locations Annual mean concentration of PM2.5 at North Street & Lewes Road continuous analyser Annual mean concentrations ($\mu\text{g}/\text{m}^3$) of NO2 at London Road monitoring sites. Annual mean concentrations ($\mu\text{g}/\text{m}^3$) of NO2 Lewes Road continuous analyser. Number of Quiet Areas designated 	<p>un-changed.</p> <ul style="list-style-type: none"> Beaconsfield Road PM10: $28\mu\text{g}/\text{m}^3$ (2012) North Street PM10: $26\mu\text{g}/\text{m}^3$ (2013) Data to be reported from 2016 onwards <p>North Street NO2:</p> <ul style="list-style-type: none"> C18: 2014 $65.8\mu\text{g}/\text{m}^3$ C19: 2014 $50.8\mu\text{g}/\text{m}^3$ C20: 2014 $47.4\mu\text{g}/\text{m}^3$ C23: 2014 $50.8\mu\text{g}/\text{m}^3$ Lewes Road: $48.7\mu\text{g}/\text{m}^3$ (2014/2015) No data available
7. To improve water quality (ecological, chemical and quantity status)	<ul style="list-style-type: none"> Encourage remediation of despoiled, degraded or contaminated land Ensure remediation of land does not result in contamination of water resources Encourage sustainable drainage solutions including green infrastructure Reduce the risk of surface water run-off Encourage sustainable use of water Reduce water consumption Maximise re-use of waste-water Conserve and maintain water resources 	<ul style="list-style-type: none"> Groundwater status Bathing water quality % of residential development that achieve CP8 minimum standards for water efficiency Domestic consumption of water/capita % of non-residential development that achieves CP8 minimum BREEAM standards % of development incorporating SUDS 	<ul style="list-style-type: none"> Poor (2016) Excellent Bathing Water Quality across all 4 beaches (2015) Will be reported from 2016 onwards 132l/person/day (metered) (2012/13) Will be reported from 2016 onwards In 2014/15 2 (2.5%) of the approved new build residential applications which submitted a Sustainability Checklist included SUDs.
8. To reduce the risk	<ul style="list-style-type: none"> Direct development to areas of lower 	<ul style="list-style-type: none"> Number of planning permissions 	<ul style="list-style-type: none"> 2014/2015 – none

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
from all sources of flooding to and from development	<p>flood risk (all sources of flooding)</p> <ul style="list-style-type: none"> • Incorporates measures to reduce vulnerability to flood risk • Ensure the risk of flooding elsewhere is not increased by development • Incorporates sustainable drainage techniques • Maintains or improves coastal defence 	<p>granted contrary to the advice of the Environment Agency on grounds of flooding</p> <ul style="list-style-type: none"> • Occurrences when groundwater level at Patcham exceeds long term average • % Development incorporating SUDS 	<p>permitted against advice of EA</p> <ul style="list-style-type: none"> • 2014-2015 – two main occurrences when levels exceeded average: between August-October and between January and March • In 2014/15 2 (2.5%) of the approved new build residential applications which submitted a Sustainability Checklist included SUDs.
9. To reduce emissions of greenhouse gases that cause climate change	<ul style="list-style-type: none"> • Encourage renewable energy generation • Encourage low/zero carbon development • Encourage energy efficient design • Facilitate development of decentralised energy networks • Encourage adoption of nationally described building standards / or environmental standards 	<ul style="list-style-type: none"> • Domestic consumption of electricity and gas (per consumer) • Commercial consumption of electricity and gas • CO2 emissions from domestic energy (kt/capita) • % residential development achieving CP8 minimum standards for energy efficiency • % non-residential development achieving CP8 minimum BREEAM standards • Number of schemes incorporating low/zero carbon energy infrastructure 	<ul style="list-style-type: none"> • Domestic Gas: 11,692kw/meter (2014) • Domestic Elec: 3624kw/consumer (2014) • Commercial Gas: 362,558 (2014) • Commercial Elec: 37,991 (2014) • 1.8 tonnes/capita • Data available from 2016 • Data available from 2016 • 90% (70 of 78) of the residential development permitted with a Sustainability Checklist in 2014/15 proposed LZC technologies
10. To increase the	<ul style="list-style-type: none"> • Considers the potential risks and 	<ul style="list-style-type: none"> • % development incorporating 	<ul style="list-style-type: none"> • 24% of residential

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
city's resilience and ability to adapt to climate change	<p>consequences of flood risk and does not increase flood risk elsewhere.</p> <ul style="list-style-type: none"> • Incorporates sustainable drainage techniques, including those that have benefits for biodiversity. • Incorporates features that may help to maintain temperatures, such as green roofs and tree-planting and recognise the services provided by ecosystems. • Ensures the design of development considers the future impacts of climate change. • Incorporates features to maximise efficient use of resources. 	<p>green walls / green roofs</p> <ul style="list-style-type: none"> • % development situated on greenfield land • % development incorporating SUDS • Number and % greenfield site developments that achieve planning permission that retain an element of ecosystem services 	<p>development permitted with a Sustainability Checklist incorporated either a green roof or a green wall</p> <ul style="list-style-type: none"> • 9% of residential development on greenfield (2014/2015) • In 2014/15 2 (2.5%) of the approved new build residential applications which submitted a Sustainability Checklist included SUDs. • No data available
11. To improve soil quality	<ul style="list-style-type: none"> • Promote sensitive management of land in open space or agricultural uses • Encourage remediation of despoiled, degraded or contaminated land • Ensure development is delivered in a way that does not result in further dispersal of contaminants • Encourage sustainable drainage solutions 	<ul style="list-style-type: none"> • Area (ha) of land under an environmental stewardship scheme • Number of sites of contaminated land that have been identified as having potential for contamination • Numbers of development proposals which will result in remediation of contaminated land 	<ul style="list-style-type: none"> • 3,024 hectares Entry Level plus Higher Level Stewardship 2,897 ha; Higher Level Stewardship 375 ha; Organic Entry Level plus Higher Level Stewardship 127 ha (2015) • There are at least 2805 prioritised sites under Part 2 A of the Environmental Protection Act 1990 • Data not available
12. To minimise and sustainably manage waste	<ul style="list-style-type: none"> • Promote waste reduction, re-use, recycling and recovery in line with the waste hierarchy • Facilitate improved accessibility to recycling and other waste management facilities 	<ul style="list-style-type: none"> • Amount of LACW waste (ton/annum) • Residential household waste (kg/household) • % household waste reused, recycled, composted or 	<ul style="list-style-type: none"> • 107,182 tonnes/annum (2014/15) • 840kg (107,182tonnes/126,827 households) <p>In 2014/15:</p>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	<ul style="list-style-type: none"> Promote building design that is resource efficient and minimises construction waste Promote the use of secondary and recycled materials including the re-use of existing materials and buildings. 	recovered	<ul style="list-style-type: none"> Reused: 21% Recycled: 3% Composted: 3% Recovered: 69%
13. To make the best use of land available	<ul style="list-style-type: none"> Regenerate derelict areas and areas of previously developed land Help to reduce the number of vacant buildings through adaptive re-use Maximise the efficient use of land by high density development in suitable locations Maximise the efficient use of land e.g. through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings. Promotes some retention of ecosystem services on Greenfield sites with development potential 	<ul style="list-style-type: none"> % of new and converted dwellings on PDL % of employment land on PDL % of development on greenfield land Number of empty properties brought back into use Number and % of greenfield site developments that achieve planning permission which retain an element of natural ecosystem services. 	<ul style="list-style-type: none"> 91% of dwellings on PDL (2014/15) 100% employment land on PDL (2014/2015) 9% residential and 0% employment on greenfield land (2014/15) 158 empty properties brought back into use (2014/2015) Data not available
Social			
14. To provide housing, including affordable housing, to contribute towards meeting local needs	<ul style="list-style-type: none"> Help to boost housing supply and help meet the housing target Provide a wide mix of housing types, sizes and tenures. Increase the availability of affordable housing Address the housing needs for various sections of the community including students, older people, disabled people, families, gypsies and travellers, and smaller households. 	<ul style="list-style-type: none"> Net annual additional dwellings Number of affordable housing completions: social rented/intermediate housing Number student bedspaces delivered House price to income ratio Number of Gypsy and Traveller pitches delivered Number of households on the housing register 	<ul style="list-style-type: none"> 581 dwellings (net) (2014/15) 132 affordable dwellings of which 44 social rented and 88 intermediate housing (14/15) 390 student bedspaces (14/15) Ratio: 10.67 (income £28,204 to average price £301,356) (2016)

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	<ul style="list-style-type: none"> Provide decent, high quality housing that can meet changing requirements. 		<ul style="list-style-type: none"> No new Gypsies and Travellers pitches delivered however development of 12 permanent pitches commenced in 2015 21,042 households on the housing register (as at April 2015)
15. To improve the range, quality and accessibility of services and facilities.	<ul style="list-style-type: none"> Increase provision of key local services and facilities, such as health, education, cultural, recreation, retail and community facilities. Ensure the vitality of town, district and local shopping centres Improve access to local services. Enable communities to meet their day-to-day needs locally 	<ul style="list-style-type: none"> Number of approved Assets of Community Value Net amount of "A" use floorspace approved (A-A5) Net amount of "D" use floorspace approved (D1-D2) Vacancy rates in Town Centres and District Centres 	<ul style="list-style-type: none"> 3 successful applications (2014/15) <p>2014/2015:</p> <ul style="list-style-type: none"> A1: 2,357m² A2: -499m² A3: 903m² A4: -256m² A5: 116m² D1: 8,735m² D2: -1,395m² <p>2013/2014:</p> <ul style="list-style-type: none"> Brighton: 5% Hove TC: 3% London Road TC: 9% St James Street DC: 9% Lewes Road DC: 9% Boundary Road DC: 5%
16. To improve health and well-being, and reduce inequalities in health	<ul style="list-style-type: none"> Encourage and facilitate walking and cycling Improve access to open space, the countryside, the seafront and other opportunities for physical activity Improve environmental quality and 	<ul style="list-style-type: none"> % population who travel to work on foot/by bike % population who's day to day activities limited a little or a lot by health or disability Male and female life expectancy 	<ul style="list-style-type: none"> 5% by bike; 20% on foot (2011) 16.3% of population activities limited by health Male: 78.8 (2011-2013) Female: 83.1 (2011-2013)

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	<p>therefore minimise adverse impacts on health from various forms of pollution</p> <ul style="list-style-type: none"> • Reduce the likelihood of health inequalities through improvements to the social determinants of health • Improve access to health facilities 	<ul style="list-style-type: none"> • Male and female healthy life expectancy • % reception year children who are obese • % Adults achieving more than 150 minutes physical activity a week • Number of developments providing sports facilities or space on site 	<ul style="list-style-type: none"> • Male: 62.8 (2014) • Female: 64.4 (2014) • 7.3% (2013/2014) • 56.2% (2014) • None (2014/2015)
17. To improve community safety, and reduce crime and fear of crime	<ul style="list-style-type: none"> • Promote design that facilitates greater community interaction • Provide opportunities for greater community interaction • Seek to minimise crime and facilitates improvements in community safety • Seek to improve road safety 	<ul style="list-style-type: none"> • Number total police recorded crime • % residents who say they feel unsafe in their local area after dark • Numbers killed or seriously injured in road traffic accidents 	<ul style="list-style-type: none"> • 23,372 recorded crimes (2015) • 11% feel unsafe after dark (City Tracker 2015) • 158 killed or seriously injured in 2014/2015
18. To increase equality and social inclusion	<ul style="list-style-type: none"> • Consider the needs of all members of the community, particularly those with protected characteristics • Improve access to education, life-long learning and training opportunities, especially • Contribute towards reducing deprivation • Improve access to employment • Encourage the development of mixed communities. 	<ul style="list-style-type: none"> • % population that believe people from all backgrounds get on well together • % population in fuel poverty (households spending more than 10% of income on fuel) • % children in poverty (children living in families in receipt of out of work benefits) • % and amount of LSOA in most 20% deprived (all domains) • % and amount of LSOA in most 20% deprived (education domain) • % and amount of LSOA in most 	<ul style="list-style-type: none"> • 91% - get on well (2015) • 11.9% - in fuel poverty (2013) • 17.5% children in poverty (2012) • 34 LSOA (21%) in 20% most deprived (all domains) IMD2015 • 30 LSOA (18%) in 20% most deprived (education domain) IMD2015 • 26 LSOA (16%) in 20% most deprived (employment domain) IMD2015

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
		20% deprived (employment domain) <ul style="list-style-type: none"> • % children achieving 5 GCSEs • % children in receipt of Free School Meals achieving 5 GCSEs 	<ul style="list-style-type: none"> • 61% attain 5 GCSEs (All) (2014/2015) • 33% attain 5 GSCES (FSM) (2013/2015)
Economic			
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	<ul style="list-style-type: none"> • Help increase the supply of land in employment uses • Support existing, new and emerging sectors • Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace • Enable the growth of high value, low carbon business • Allow for flexible working practices • Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment. • Increase the quantity and quality of employment opportunities in a range of different sectors. • Enable local people to gain new skills to increase their employment opportunities 	<ul style="list-style-type: none"> • GVA per head • Average weekly wages (residents and workplace) • Amount of money secured via Developer Contributions for training through the Local Employment Scheme • Net amount B use floorspace approved (B1-B8) • Amount of B uses floorspace lost to residential uses • % working age population in employment • % working age population unemployed • % working age population claiming out of work benefits • % population with no qualifications • Amount and % of people travelling out of the city for work 	<ul style="list-style-type: none"> • GVA/head £24,161 (2014) • Residents annual earnings £28,444 (2015) • Workplace annual earnings £26,728 (2015) • LES contributions £159,980 (2014/2015) • 2014/2015 overall net loss of -4,098m2 as follows: <ul style="list-style-type: none"> • B1a: -3,486m2 • B1b: -410 • B1c: -181 • B2: -394 • B8: 373 • 5,700m2 emp. floorspace lost to residential development via prior approval (2014/2015) • 71.1% of working age population in employment (2015) • 5.6% of working age population unemployed

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
			<ul style="list-style-type: none"> • 1.4% of the working age population claim out of work benefits (2015) • Census 2011 – working age population: 193,332 • 31,915 daily in-commuters • 37,310 daily out-commuters (19% of working age population at time of Census)



For Official Use:
Respondent Number:
Date Received:

Brighton & Hove City Council
City Plan Part Two Sustainability Appraisal Scoping Report
Word Response Form
Consultation Period: Thursday 30 June until
5pm Thursday 22 September 2016

Brighton & Hove City Council is seeking your comments on the Sustainability Appraisal Scoping Report. The SA Scoping Report, incorporating the requirements of the Strategic Environmental Assessment Directive, sets out the sustainability context, baseline data and relevant sustainability issues. It includes a framework and methodology for assessing the emerging City Plan Part Two.

This form has two parts: Part A – Personal Details
 Part B – Your Comment(s).

Representations should only relate to the City Plan Part Two Sustainability Appraisal Scoping Report

Data Protection Notice: Personal Information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with statutory functions. It will not be used for any other purpose. Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

Part A: Personal Contact Details

Please note that you must complete Part A as anonymous forms or those that do not contain an address cannot be accepted.

Responses will not be treated as confidential and will be published on our website and in any subsequent statements; however, personal details such as address, phone number or email address will be removed.

	1. Your Details	2. Agent Details (if applicable)
Title		
Forename		
Surname		
Job Title		
Organisation		
Address		
Postcode		
Email Address		

Telephone No.		
Mobile No.		

Part B: Your Comments

Topic

Q1. Please could you indicate which topic you are commenting on? (Please tick one box only and complete a new form for each topic)

- Biodiversity & Geodiversity
- Water Quality and Resources
- Soil, Waste and Land Resources
- Air Quality and Transportation
- Climatic Factors and Flooding
- Cultural Heritage, Landscape and Open Space
- Population, Human Health & Inequalities
- Housing & Community
- Local Economy, Employment, Skills and Education

Context Review and Appendix A

Q2 Are there any other documents that should be referred to as part of the Context Review?

- Yes
- No

Q2a If yes, please provide further details

Baseline Data, Indicators and Appendix B

Q3 Is there any other baseline data, which is readily available, that would be useful for the baseline or for monitoring purposes?

- Yes
- No

Q3a If yes, please provide further details

Sustainability Issues

Q4 Does the Sustainability Issues section adequately address the main issues?

Yes

No

Q4a If No, please provide further details

SA Framework

We would particularly value your feedback and input into the proposed Sustainability Appraisal Framework. The SA Objectives have been revised since the City Plan Part 1, and new “Decision Making Criteria” have been developed for both the policy appraisals and the site assessments to help guide assessments.

Q5 Do the proposed Sustainability Appraisal objectives cover the main issues and form an adequate appraisal framework for the policies and site allocations?

Yes

No

Q5a If No, please suggest changes

Q6 Will the proposed Decision Making Criteria for the policies help to produce a meaningful assessment of the emerging policies?

Yes

No

Q6a If No, please suggest changes

Q7 Will the proposed Decision Making Criteria for the sites help to produce a meaningful assessment of the potential sites and inform site allocations?

Yes

No

Q7a If No, please suggest changes

Please fill in additional sheets for each topic area as required

Signed*:	
Dated*:	

All representations must be received at the email or postal address given on this form by **5.00pm on Thursday 22 September 2016**. Late comments will not be accepted.

Completed forms should be sent to:

Email: planningpolicy@brighton-hove.gov.uk

Post: Brighton & Hove City Council
Planning Policy Team
2nd Floor King's House
Grand Avenue
Hove BN3 2LS

If you have any further queries please contact us on 01273 292505 or via email planningpolicy@brighton-hove.gov.uk

Thank you for taking time to complete this questionnaire