

Compiled by the Planning Policy, Projects & Heritage Team  
at Brighton & Hove City Council

# **City Plan Part Two Sustainability Appraisal**

**June 2018**



Brighton & Hove  
City Council

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## **Section 1 Introduction and background**

### **1.1 Purpose of this report**

This document forms the Sustainability Appraisal (SA), incorporating the requirements of the Strategic Environmental Assessment Directive<sup>1</sup> and Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), of the draft City Plan Part Two Development Plan Document.

This document will:

- State why an integrated SEA / SA is required
- Describe the SEA / SA process
- Summarise previous stages undertaken at Scoping Stage
- Undertake Stages (6), (7) , (8), (9) and (10) of Schedule 2 of the SEA Regulations and Stages B, C and D of Sustainability Appraisal.

### **1.2 Requirement for Sustainability Appraisal and Strategic Environmental Assessment**

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 the EU Directive and the relevant Regulations, 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 process.

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.

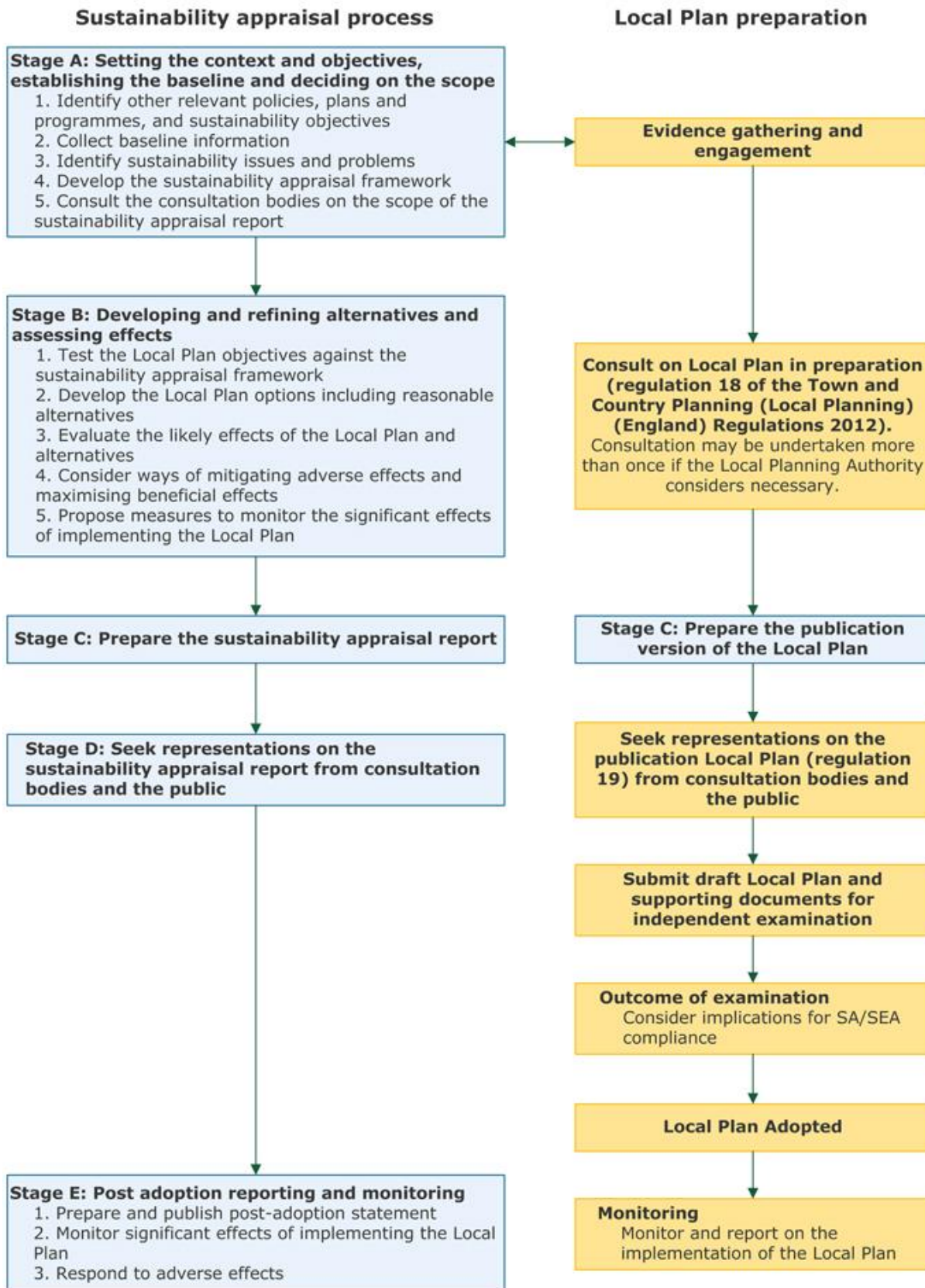
SEA introduces a systematic assessment of the environmental effects of plans or programmes, including land use plans. Its objective is “to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans 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.

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 Guidance, ensuring that all issues are considered. From herein, the combined document will be referred to solely as the Sustainability Appraisal (SA). The stages of SA/SEA and relevant stages of plan-making are illustrated in Figure 1.

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<sup>1</sup> European Directive EC/2001/42

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



### 1.3 Local Development Plan

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)<sup>2</sup> 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, sets out strategic objectives, identifies 8 locations for major development and allocates strategic sites. It also identifies the urban fringe as a broad location for development. The City Plan Part One also sets some policies that guide decisions on planning applications.

City Plan Part One underwent its own SA process as part of its preparation which included an assessment of options for growth, assessment of a revised spatial strategy including development on the urban fringe, and assessment of options and policies. The City Plan Part 1, Sustainability Appraisal and all relevant accompanying background information was assessed by an independent planning inspector between the period 2013 to 2016 and was found sound.<sup>3</sup> The SA at this stage therefore does not re-assess the strategic approach to growth or any policies included with City Plan Part 1.

The City Plan Part Two will allocate some additional strategic sites that have become available since preparation of City Plan Part One, will allocate additional smaller sites for various uses, such as housing and employment, and will 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.

### Sustainability Appraisal Process and Plan Making

#### 1.4 SA Scoping Report - 2016

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.

The Scoping Report is considered as Stage A in the SA process as shown in Figure 1. 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). Stage A can be broken down into the 5 key tasks shown in Table 1.1:

**Table 1.1 Key Scoping Stages of SEA and SA**

SEA 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 or 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	The environmental characteristics of areas likely to	

<sup>2</sup> [City Plan Part 1](#)

<sup>3</sup> [City Plan examination documents](#)

(3)	be significantly affected	
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 & Issues
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

In addition, the scoping stage also involves the development of the SA objectives based on the issues identified during the context and baseline review, which form a framework for undertaking the appraisals.

The Scoping Report was made available for a 12-week period of public consultation between June and September 2016 alongside the City Plan Part Two Scoping Paper which set out the issues that City Plan Part Two would need to address. The consultation comments received on the Scoping Report can be found in Appendix C.

### 1.5 Stages undertaken in this Sustainability Appraisal Report – 2018

This SA Report is considered to present the findings of stage B in the SA process as shown in Figure 1 and in itself is stage C. The SA Report must also meet the requirements of the SEA Regulations Schedule 2 (6-9). This stage can be broken down into the tasks as shown in Table 1.2

**Table 1.2 SEA/SA tasks undertaken at this stage**

SEA Regulations	SEA Requirements	Stage of SA / SA Requirement
(N/A)	(N/A)	B1 – Test the City Plan Objectives against the SA Framework
Schedule 2 (8)	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties.	B2 – Develop City Plan options including reasonable alternatives
Schedule 2 (6)	The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects.	B3 - Evaluate the likely effects of the City Plan Part 2 and alternatives
Schedule 2 (7)	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or	B4 – Consider ways of mitigating adverse effects and maximising beneficial effects



	programme.	
Schedule 2 (9)	A description of the measures envisaged concerning monitoring.	B5 – Propose measures to monitor the effects of the City Plan

Stages B1 to B5 have been carried out between January 2017 and May 2018, and include appraisals of policy options, appraisals of sites and appraisals of draft policies.

### 1.6 Outline of Contents of the City Plan Part Two

The draft CPP2 sets out 7 proposed strategic site allocations, 1 additional special area policy, proposed site allocations for housing including student housing, proposed opportunity area for employment, and includes 46 draft Development Management Policies.

The draft CPP2 contains the following policies:

#### Development Management Policies

- DM1 - Housing Quality, Choice and Mix
- DM2 - Retaining Housing
- DM3 - Residential Conversions and Retention of Smaller Dwellings
- DM4 - Housing and Accommodation for Older Persons
- DM5 - Supported Accommodation (Specialist and Vulnerable Needs)
- DM6 - Build to Rent Housing
- DM7 - Homes in Multiple Occupation
- DM8 - Purpose Built Student Accommodation
- DM9 - Community Facilities
- DM10 - Public Houses
- DM11 - New Employment / Business Floorspace
- DM12 - Primary, Secondary and Local Centre Shopping Frontages
- DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units
- DM14 - Special Retail Area - Brighton Marina
- DM15 - Special Retail Area - The Seafront
- DM16 – Markets
- DM17 - Opportunity Search Areas for New Hotels and Safeguarding Conference Facilities
- DM18 - High Quality Design and Places
- DM19 - Maximising Development Potential
- DM20 - Protection of Amenity
- DM21 - Extensions and Alterations
- DM22 - Landscape Design and Trees
- DM23 - Shopfronts
- DM24 - Advertisements
- DM25 - Communications Infrastructure
- DM26 - Conservation Areas
- DM27 - Listed Buildings
- DM28 - Locally Listed Heritage Assets
- DM29 - The Setting of Heritage Assets
- DM30 - Registered Parks and Gardens

- DM31 - Archaeological Interest
- DM32 - The Royal Pavilion Estate
- DM33 - Safe, Sustainable and Active Transport
- DM34 - Transport Interchanges
- DM35 - Travel Plans and Transport Assessments
- DM36 - Parking and Servicing
- DM37 - Green Infrastructure and Nature Conservation
- DM38 - Local Green Spaces and Gateways
- DM39 - Development on the Seafront
- DM40 - Protection of Environment and Health – Pollution and Nuisance
- DM41 - Polluted Sites, Hazardous substances and Land Stability
- DM42 - Protecting the Water Environment
- DM43 - Sustainable Urban Drainage
- DM44 - Energy Efficiency and Renewables
- DM45 - Community Energy
- DM46 - Heating and cooling network infrastructure

### **Special Area policies**

- SA7 - Benfield Valley

### **Strategic Site Allocations**

- SSA1 - Brighton General Hospital site
- SSA2 - Combined Engineering Depot, New England Road
- SSA3 - Land at Lyon Close, Hove
- SSA4 - Sackville Trading Estate and Coal Yard, Hove
- SSA5 - Madeira Terraces and Drive
- SSA6 - Former Peter Pan Leisure Site (adjacent Yellow Wave), Madeira Drive
- SSA7 - Land Adjacent to American Express Community Stadium, Village Way

### **Housing Sites**

- H1 - Housing and Mixed Use Sites
- H2 - Urban Fringe Housing Sites
- H3 - Purpose Built Student Accommodation Sites

### **Other Site Allocations**

- E1 Opportunity site for new business and warehouse uses

## **Section 2 Methodology**

### **2.1 Introduction**

This section summarises the stages undertaken in Stage A of the Sustainability Appraisal process (Scoping Stage) and Stage B (this stage) and signposts to the relevant sections of the report. It also sets out any difficulties encountered.

### **2.2 Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope**

#### **A1 – Identifying other Plans, Programmes & Guidance**

A number of plans and policies were identified that were of relevance to the development of CPP2 during the initial scoping stage and were described within the Context Review for each topic section within the Scoping Report. These documents can be found in Appendix A and a summary can be found in Section 3 Sustainability Context and Issues of Brighton & Hove.

#### **A2 – Collect Baseline Data**

A considerable amount of data, that helps to show the current state of various aspects of the city, was collected by reviewing a range of documents and data sources or through the commissioning of studies. This data was used to show the current baseline with regards to each topic section within the Scoping Report. A summary of the baseline data can be found in Appendix B.

Mapped data identifying citywide statistics, issues and constraints was also produced at Scoping Stage and can be found in the Scoping Report.

#### **A3 - Identification of Sustainability Issues, Objectives and Indicators**

Through the examination of the plans and policies, together with the findings of the baseline data, the different sustainability issues, including environmental, economic and social issues, of Brighton & Hove were identified. These were presented in each of the topic sections within the Scoping Report. A summary can be found in Section 3 Sustainability Context and Issues of Brighton & Hove.

#### **A4 – Development of Sustainability Appraisal Framework**

From the issues that were identified, a number of sustainability appraisal objectives were identified that formed the Sustainability Appraisal Framework, which built upon and updated the Sustainability Appraisal Framework that was used to assess City Plan Part 1. The Framework consists of 19 objectives all of which are supported by Decision Making Criteria that were used to assess the potential impacts of CPP1 Strategic Objectives, CPP2 policy options and final draft policies. A separate framework was also used to assess proposed sites.

The Sustainability Appraisal Frameworks can be found in tables 3.1 and 3.2 in Section 3

All of the information described above was published in the Scoping Report 2016.

### **2.3 Stage B Developing and refining the options and testing the effects**

#### **B1 – Testing the DPD Objectives**

The 23 Strategic Objectives of the City Plan Part One were tested against the Sustainability Appraisal Framework during the preparation of City Plan Part 1. This helped to identify any areas of potential conflict and to ensure the Plan is meeting the aims of sustainable development. At the time, the objectives were

found to be overall compatible and recommendations for mitigation were made where conflicts were identified, which were found to be covered by the remaining objectives.

As the Sustainability Appraisal Framework has been revised for City Plan Part Two, the Strategic Objectives of CPP1 have again been tested against this new framework.

The full comparison can be found in Section 4.

## **B2 - Developing the options**

A City Plan Scoping Paper was published alongside the Sustainability Appraisal Scoping Report in 2016. This set out the various topics that it was considered the City Plan Part 2 should contain, building on City Plan Part 1, to ensure an appropriate development management framework against which planning applications could be assessed. Consultation responses received on the Scoping Paper helped to inform which policy areas should be pursued and what was supported. Between 3 and 4 options for each policy area were then identified and the SA assessed each option against the SA Framework to help guide which option would be the most sustainable approach.

The general method used to assess each of the policy options is as follows:

Strong positive impact:	++
Positive impact:	+
No impact:	0
Negative impact:	-
Strong negative impacts:	--
Impact uncertain:	?
Mixed impacts:	-/+

The multiple symbols were also used to indicate significance, or where the impact of an option was substantially better or worse than others. Significance was also rated on

- the importance of the option/policy for achieving each of the appraisal objectives
- the certainty or probability that the effect is likely to be a direct consequence of the option/policy
- whether the effects would be permanent or not

The full options appraisals for each policy can be found in Appendix D and the preferred option for each policy is summarised in section 5.

## **B3 & B4 Predicting and evaluating the effects of the CPP2**

### **Site Assessments**

All of the sites proposed for allocation were assessed against the Sustainability Appraisal Framework to determine the sustainability implications of development on sites. The SA site assessment process did not assess options for uses on sites, nor was it used to discount sites, for example on sustainability grounds. This is mainly because the city does not have a large pool of sites to draw upon and it is not possible to discount sites e.g. because of their poor scoring against the sustainability appraisal framework. The site assessment process helped to inform any on-site mitigation and formed the basis for the SA assessment of the final policy where relevant, including the strategic site allocations and housing allocations policies.

The site assessments can be found in Appendix F. This also includes some sites which were rejected which initially fitted the preferred options for allocation. Further information on how sites were identified for allocation can be found in the Site Allocations Topic Paper.

## **Policy Assessment**

Following the options appraisals, the policies were drafted. Each policy was assessed against the SA Framework using the methodology as described under B2. The commentary within each appraisal outlines the likely effect and indicates whether the effect is likely to be positive or negative. The appraisals also indicate whether the impact is likely to be direct or indirect, permanent or temporary and outline the predicted effects according to timeframe.

The full appraisals can be found in Appendix G and the appraisal findings are summarised in section 5.

Section 8 sets out the anticipated cumulative effects and the likely significant effects of CPP2.

## **B5 - Mitigation and Limitations**

A summary of the main findings for each appraisal as well as any relevant mitigation, recommendations and any limitations can be found in the full appraisals within Appendix G. In addition, a summary of the general type of mitigation that may be required can be found in Section 7.

## **B6 - Monitoring**

Section 10 outlines the more general indicators relating to the Sustainability Appraisal Objectives. It should be noted that the monitoring indicators proposed are already being monitored under City Plan Part 1 and this reflects the relative nature of the two documents.

## **2.4 Difficulties encountered**

A number of difficulties were encountered when undertaking the appraisals:

### **Data Limitations**

Lack of available data or reliable data is a common problem affecting Sustainability Appraisal. Data limitations for each of the topic areas was set out in the Scoping Report. Certain datasets are out of date and in some cases there is no data available. This results in it being difficult to quantify with any certainty the likely effects of policies.

### **Uncertainty**

At options stage there is a great deal of uncertainty with regards to the final contents of a policy which makes predictions and appraisals difficult. Also, at options stage, options for sites to be allocated were also unknown, making it difficult to predict whether options would have site-based impacts or not.

### **Significance**

There are only few agreed sustainability thresholds over which significant impacts are considered likely. This results in it being difficult to assess the significance of any impacts with any certainty.

## Section 3 Sustainability Context, Issues and Sustainability Framework

### 3.1 Introduction

This section summarises the outcome of the work undertaken during Stage A of SA: the policy context review, the collection of baseline information, the identification of sustainability issues and a description of the likely future baseline. This information was presented in detail in the Scoping Report 2016 and should be referred to if full details are required. In addition, the policy context review can be found in Appendix A and the baseline information can be found in Appendix B.

This section summarises this information by topic.

### 3.2 Biodiversity & geodiversity

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
- 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
- Conserve and enhance locally and nationally designated sites
- Help to deliver the aims of the Brighton & Lewes Downs Biosphere
- Increase awareness and understanding and engagement with/of local biodiversity and the natural environment

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

- The city contains one site with a European designation. Threats to this site could include increased leisure and recreation use, increased water abstraction and increased air pollution
- 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.
- Not all sites that support priority species have a formal designation and therefore could be at risk.
- Nature conservation sites provide a number of important functions beyond the protection of biodiversity which are often not recognised.
- There are localised deficiencies in the Natural/Semi-Natural open space typology, particularly in the central more urban areas of the city. 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.
- Human use and climate change threaten the city's nature conservation sites and biodiversity.

Likely future baseline:

- 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.
- 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.
- Actions and projects arising from the BAP and the Biosphere programme have the potential to benefit local biodiversity if implemented.
- The effects of climate change could be a threat to some sites and could result in significant changes to habitat dynamics and species interactions.
- There is significant pressure from development which may result in loss of habitats or species.
- There will be greater deficiencies in the amount of Natural/Semi-Natural open space available per person due to the predicted rise in population, combined with the possible loss of these sites to development, making it more difficult for people to have contact with nature.
- The lack of data for some sites means that it is difficult to identify trends.

### 3.3 Water quality and resources

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

- Reduce pressure on water resources
- Ensure the sustainable use of water
- Encourage water efficiency measures
- Protect and improve water quality with groundwater to meet overall “good” status by 2027
- Avoid the pollution of water resources
- Improve flood risk management, including flooding from surface water and groundwater
- 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

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 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. 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.

#### Likely future baseline:

- Sea water is likely to remain of a good or excellent standard due to recent improvements in infrastructure that treats wastewater.
- 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.
- There are targets and actions set out in the Southern Water Management Plan that should help to reduce demand and increase supply, which could improve the “quantity” status.
- Impacts from climate change, such as higher temperatures and lower rainfalls could impact on recharge.
- The amount of water consumed per person should decrease due to metering and local targets for new houses. However, overall there is likely to be an increase in water consumption due to the target to deliver 13,200 new homes.

### **3.4 Soil, waste and land resources**

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

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 brownfield 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 arising 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.



### Likely future baseline:

- 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.
- 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.

### **3.5 Air quality and transport**

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

- Maintain ambient air quality where it is good
- 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
- Ensure new development in Air Quality Management Areas is consistent with the Local Air Quality Action Plan
- Ensure new and existing developments does not contribute to, is put at unacceptable risk from, or is 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

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

### Likely future baseline:

- Trends indicate that air quality in lower density areas and suburban areas will continue to improve. Although trends suggest that NO<sub>2</sub> 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 enough to meet the air quality objective.
- 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.
- Congestion is anticipated to worsen in the long-term, based on an increase in population and associated car ownership.
- 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.
- Local investment in cycling infrastructure, as well as local trends, suggest that travel by bike is likely to increase.
- 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.
- It is likely that road-traffic related noise will also increase, based on the likelihood that transport movements will continue to increase.

### **3.6 Climate change and flooding**

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

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

- Carbon emissions from domestic sources are higher than UK 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.

#### Likely future baseline:

- Predictions indicate that in the 2020s average temperatures in the south east 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.
- 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.
- 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.
- It is anticipated that total carbon emissions from domestic sources will continue to increase, based on the amount of new residential development that will come forward, despite targets to improve energy efficiency of new developments.

### **3.7 Cultural heritage, landscape and open space**

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

- Understand, conserve and manage heritage assets in accordance with their significance
- Create an accessible historic environment that everyone can identify and engage with
- Ensure that new development makes a positive contribution to local character and distinctiveness.
- Respect the special character of all landscapes, townscapes and streetscapes
- Protect and enhance valued landscapes
- Conserve and enhance the natural beauty, wildlife and cultural heritage of the SDNP and its setting
- Promote opportunities for the understanding and enjoyment of the special qualities of the SDNP
- Foster the social and economic wellbeing of the local communities within the National Park
- Recognise the contribution that open space, sports and recreation make to health and well-being
- Maximise opportunities to provide green infrastructure and links to the existing green network/Nature Improvement Area
- Increase opportunities to facilitate active lifestyles
- 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

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 and are therefore visually sensitive. Development outside the SDNP should not adversely affect the character of the National Park and its landscape types.
- The open space needs of the future population cannot be met by existing provision. 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.
- 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 most sites.

#### Likely future baseline:

- Restrictions imposed by heritage designations together with planning controls should help to protect heritage assets from harm. However, permitted development rights are likely to continue to pose a risk to some heritage assets, unless further Article 4 Directions are introduced.
- 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.
- Some assets at risk may be removed from the “at risk register” due to funding or schemes including Stanmer Park, Valley Gardens and Marlborough House. 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.
- 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 and may help to improve the quality of design in the city.
- Increasing traffic, urban development and light pollution may have an impact on the tranquillity and remoteness experienced in the South Downs National Park.
- 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.
- The demand for allotments is likely to continue to exceed supply.
- Some of the open space functions provided by some of the urban fringe sites will be lost due to development pressures.

### **3.8 Population, human health and inequalities**

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 and facilitate active lifestyles
- 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

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

- Inequalities in the social determinants of health, such as education, employment, housing and income 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 the UK 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.

Likely future baseline:

- ONS predicts that by 2030 the population will have increased to 310,900. However, this is based on unconstrained growth: the City Plan housing target is likely to constrain population growth to some degree.
- 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.
- The diversity of the city's population is anticipated to increase, particularly with people who are born in a different country. Migration to the UK – by those seeking asylum and others – is however unpredictable and dependent on world events and EU economies and may change as a result of Brexit.

- 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.
- The number of residents who have a moderate or severe physical impairment is expected to increase.
- 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.
- 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.
- Educational attainment is likely to continue to improve, although it is likely that the gap between those from deprived or affluent backgrounds will still be significant.
- Growth in the local economy should help to reduce income and employment based deprivation, having associated effects on child poverty and fuel poverty.
- 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.

### **3.9 Housing and community**

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

- Increase housing supply and deliver a mix of housing to meet local housing needs
- Improve housing quality so that residents are able to live in decent homes suitable for their needs
- 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

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 local 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 who have specialist needs.
- There is a limited supply of land in the city; the good 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.

Likely future baseline:

- Demand for housing is likely to increase, with demand exceeding supply even if the CPP1 annual housing target is reached.

- The cost of housing, both to purchase and to rent is likely to remain above the UK average and will continue to form a high proportion 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.
- 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.
- The proportion of affordable housing should increase, particularly on smaller sites, and through the New Homes for Neighbourhoods Programme, however is unlikely to meet local need.
- 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.
- 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.
- 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.

### 3.10 Economy, employment, skills and education

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
- Provide the infrastructure required to support a growing economy including modern office space
- Provide a year round visitor economy
- Secure the city's conference economy
- Recognise the role of the SDNP in delivering eco-tourism
- Ensure vitality and viability of town and other retail centres and recognise their role as the heart of communities
- Reduce unemployment and encourage higher value jobs
- Improve education and skills so that local residents are equipped to enter the labour market
- Provide sufficient school places across the city in locations where they are required
- Reduce the number of people in poverty

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.

Likely future baseline:

- 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.
- The local economy is likely to continue to grow and new jobs are likely to be created.
- Emerging industries, such as green industries are likely to grow, through ongoing investment and support.
- Existing industries, such as the CDIT sector will continue to grow and will play a role in helping to increase average wages locally.
- Public administration, education and health is likely to remain the highest employment sector in the city.
- The tourism and retail sectors will continue to be major sources of employment in the city.
- 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.
- 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.
- The number of school places required across the city will continue to increase in-line with the predicted increase in population.
- 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.
- 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.



### 3.11 Developing the SA Framework

Stage A4 of the SA process involved developing a framework consisting of sustainability objectives against which the options and policies of the emerging Plan would be tested. This was developed using the issues identified during the earlier stages of the scoping stage. The SA Framework built upon and updated the SA Framework used to assess City Plan Part 1 and consists of 19 objectives as well as sub-objectives which are used as Decision Making Criteria that help to guide the appraisals. In addition, a separate framework with a methodology for scoring was developed to assess sites to help draw out the relative sustainability merits or issues.

**Table 3.1 SA Framework (policies)**

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"> <li>• Protect and enhance international and national designated sites (e.g. SAC, SSSI, NNR, LGS, MCZ).</li> <li>• Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species.</li> <li>• Protect and prevent the loss of irreplaceable habitats such as Ancient Woodland.</li> <li>• Recognise the contribution towards biodiversity from various types of open space</li> <li>• Increase understanding and access to biodiversity/nature for local people.</li> <li>• Recognise the importance of linear features for biodiversity connectivity and movement</li> <li>• Provide opportunities to achieve a net gain in biodiversity</li> <li>• Recognise the multi-functional benefits of ecosystem services provided by biodiversity and green infrastructure</li> <li>• Improve links between existing and/or new biodiversity and the Green Network/Nature Improvement Area</li> </ul>
2. To protect and improve open space and green infrastructure and improve sustainable access to it	<ul style="list-style-type: none"> <li>• Contribute to meeting the city's open space, sports and recreation requirements</li> <li>• Improve the quality and/or make better use of existing open space</li> <li>• Replace existing open space with improved quality or quantity</li> <li>• Improve sustainable access to existing or new open space</li> <li>• Increase opportunities for use of open spaces, including the seafront</li> <li>• Recognise the importance of the seafront, beach and sea</li> <li>• Consider a landscape scale approach to open space and green infrastructure</li> <li>• Protect and enhance public rights of way</li> <li>• Encourage the incorporation/creation of various types of open space within development, including opportunities for food growing</li> </ul>
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"> <li>• Protect the landscape character and special characteristics of the SDNP and its setting</li> <li>• Protect and enhance important views to and from the SDNP</li> <li>• Encourage sustainable access to the SDNP</li> <li>• Promote sustainable tourism to the SDNP</li> <li>• Limit the impact of light pollution on the SDNP</li> <li>• Protect and enhance public rights of way</li> </ul>
4. To protect and conserve the city's historic built environment, heritage assets and their	<ul style="list-style-type: none"> <li>• Protect, conserve and enhance listed buildings, registered parks &amp; gardens, conservation areas and scheduled ancient monuments and their settings.</li> <li>• Take account of assets on the Local List</li> <li>• Recognise the potential for undesigned archaeological assets.</li> </ul>

<b>Proposed SA Objective</b>	<b>Proposed Decision Making Criteria (Will the objective/option/policy...)</b>
settings, townscapes, buildings and archaeological sites	<ul style="list-style-type: none"> <li>• Support the integration of new development into the built and historic environment</li> <li>• Respect, maintain and strengthen local character and distinctiveness</li> <li>• Promote high quality design that establishes a strong sense of place</li> <li>• Take into account the existing character of adjacent communities and neighbourhoods.</li> </ul>
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	<ul style="list-style-type: none"> <li>• Encourage mixed-use development and sustainable communities that reduce the need to travel</li> <li>• Encourage the location of development close to where use of sustainable transport can be maximised</li> <li>• Improve public and sustainable transport infrastructure including links and access</li> <li>• Increase permeability and provide other measures to encourage health-beneficial forms of travel including cycling and walking</li> <li>• Promote low-carbon forms of transport</li> <li>• Improve road safety to encourage cycling and walking</li> <li>• Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations</li> <li>• Protect and enhance public rights of way</li> </ul>
6. To improve air and noise quality	<ul style="list-style-type: none"> <li>• Minimise the causes of air pollution</li> <li>• Reduce congestion</li> <li>• Reduce the need to travel by car</li> <li>• Support the development of cleaner technologies (e.g. low-emission vehicles)</li> <li>• Take account of Air Quality Management Areas, where relevant.</li> <li>• Reduce the need to travel by car</li> <li>• Support measures that reduce road related noise</li> <li>• Ensure compatibility of uses to reduce risk of noise nuisance</li> </ul>
7. To improve water quality (ecological, chemical and quantity status)	<ul style="list-style-type: none"> <li>• Encourage remediation of despoiled, degraded or contaminated land</li> <li>• Ensure remediation of land protects and enhances water resources</li> <li>• Ensure appropriate sustainable drainage solutions are implemented in GSPZ</li> <li>• Ensure implementation of sustainable drainage solutions including green infrastructure</li> <li>• Ensure the timely and necessary provision of waste water treatment</li> <li>• Maintain high standards of bathing water quality, e.g. through timely provision of waste water infrastructure</li> <li>• Reduce the risk of surface water run-off</li> <li>• Encourage sustainable use of water</li> <li>• Reduce water consumption</li> <li>• Maximise re-use of waste-water</li> <li>• Conserve and maintain water resources</li> </ul>
8. To reduce the risk from all sources of flooding to and from development	<ul style="list-style-type: none"> <li>• Direct development to areas of lower flood risk (all sources of flooding)</li> <li>• Considers and mitigates the potential risks and consequences of flood risk and does not increase flood risk elsewhere.</li> <li>• Incorporates measures to reduce vulnerability to flood risk</li> <li>• Ensure the risk of flooding elsewhere is not increased by development</li> <li>• Incorporates appropriate sustainable drainage solutions, particularly in GSPZ</li> <li>• Maintains or improves coastal defences</li> </ul>
9. To reduce	<ul style="list-style-type: none"> <li>• Encourage renewable energy generation</li> </ul>

<b>Proposed SA Objective</b>	<b>Proposed Decision Making Criteria (Will the objective/option/policy...)</b>
emissions of greenhouse gases that cause climate change	<ul style="list-style-type: none"> <li>• Encourage low/zero carbon development</li> <li>• Encourage energy efficient design</li> <li>• Facilitate development of decentralised energy networks</li> <li>• Encourage adoption of nationally described building standards / or environmental standards</li> </ul>
10. To increase the city's resilience and ability to adapt to climate change	<ul style="list-style-type: none"> <li>• Considers and mitigates the potential risks and consequences of flood risk and does not increase flood risk elsewhere.</li> <li>• Incorporates sustainable drainage techniques, including those that have benefits for biodiversity.</li> <li>• Incorporates features that may help to maintain temperatures, such as green roofs and tree-planting and recognise the services provided by ecosystems.</li> <li>• Ensures the design of development considers the future impacts of climate change.</li> <li>• Incorporates features to maximise efficient use of resources.</li> <li>• Encourage sustainable use of water</li> </ul>
11. To improve soil quality	<ul style="list-style-type: none"> <li>• Promote sensitive management of land in open space or agricultural uses</li> <li>• Encourage remediation of despoiled, degraded or contaminated land</li> <li>• Ensure development is delivered in a way that does not result in further dispersal of contaminants</li> <li>• Encourage sustainable drainage solutions</li> </ul>
12. To minimise and sustainably manage waste	<ul style="list-style-type: none"> <li>• Promote waste reduction, re-use, recycling and recovery in line with the waste hierarchy</li> <li>• Facilitate improved accessibility to recycling and other waste management facilities, including composting</li> <li>• Promote building design that is resource efficient and minimises construction waste</li> <li>• Promote the use of secondary and recycled materials including the re-use of existing materials and buildings.</li> </ul>
13. To make the best use of land available	<ul style="list-style-type: none"> <li>• Regenerate derelict areas and areas of previously developed land</li> <li>• Help to reduce the number of vacant buildings through adaptive re-use</li> <li>• Maximise the efficient use of land by high density development in suitable locations</li> <li>• Encourage low car/car-free developments in accessible locations</li> <li>• Maximise the efficient use of land e.g. through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings.</li> <li>• Promotes some retention of ecosystem services on Greenfield sites with development potential</li> </ul>
<b>Social</b>	
14. To provide housing, including affordable housing, to contribute towards meeting local needs	<ul style="list-style-type: none"> <li>• Help to boost housing supply and help meet the housing target</li> <li>• Provide a wide mix of housing types, sizes and tenures.</li> <li>• Increase the availability of affordable housing</li> <li>• Address the housing needs for various sections of the community including students, older people, disabled people, families, gypsies and travellers, and smaller households.</li> <li>• Provide decent, high quality housing that can meet changing requirements.</li> </ul>
15. To improve the range, quality and accessibility of	<ul style="list-style-type: none"> <li>• Increase provision of key local services and facilities, such as health, education, cultural, recreation, community and retail including food</li> <li>• Ensure the vitality of town, district and local shopping centres</li> </ul>

<b>Proposed SA Objective</b>	<b>Proposed Decision Making Criteria (Will the objective/option/policy...)</b>
services and facilities.	<ul style="list-style-type: none"> <li>• Improve access to local services and facilities by sustainable transport.</li> <li>• Enable communities to meet their day-to-day needs locally</li> </ul>
16. To improve health and well-being, and reduce inequalities in health	<ul style="list-style-type: none"> <li>• Encourage and facilitate walking and cycling</li> <li>• Facilitate opportunities that promote physical activity and supports mental well-being, e.g. through access to various types of open space</li> <li>• Improve environmental quality and therefore minimise adverse impacts on health from various forms of pollution</li> <li>• Reduce the likelihood of health inequalities through improvements to the social determinants of health</li> <li>• Improve access to health facilities</li> <li>• Encourage the development of mixed and balanced communities with opportunities for community interaction</li> </ul>
17. To improve community safety, and reduce crime and fear of crime	<ul style="list-style-type: none"> <li>• Promote design that facilitates greater community interaction</li> <li>• Provide opportunities for greater community interaction</li> <li>• Seek to minimise crime and facilitates improvements in community safety</li> <li>• Seek to improve road safety</li> <li>• Encourage communities to value the local environment</li> </ul>
18. To increase equality and social inclusion	<ul style="list-style-type: none"> <li>• Consider the needs of all members of the community, particularly those with protected characteristics</li> <li>• Improve access to education, life-long learning and training opportunities</li> <li>• Improve access to employment opportunities</li> <li>• Contribute towards reducing deprivation</li> <li>• Encourage the development of mixed communities.</li> </ul>
<b>Economic</b>	
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"> <li>• Help increase the supply of land in employment uses</li> <li>• Support existing, new and emerging sectors</li> <li>• Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace</li> <li>• Enable the growth of high value, low carbon business</li> <li>• Allow for flexible working practices</li> <li>• Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment.</li> <li>• Increase the quantity and quality of employment opportunities in a range of different sectors.</li> <li>• Enable local people to gain new skills to increase their employment opportunities</li> <li>• Facilitate access to employment by sustainable transport</li> </ul>

**Table 3.2 SA Framework (sites)**

It should be noted that this was used as a guide for assessing sites and involved a certain degree of interpretation. Text that is underlined> has been added since the Scoping Report was published to help guide a more accurate assessment.

<b>Proposed SA Objective</b>	<b>Score</b>	<b>Proposed Decision Making Criteria (Will/does the site...)</b>
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).
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, Registered 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 by car, encourage travel by sustainable forms of transport 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 ( <u>e.g. less than 100 light daily vehicles within AQMA; less than 500 light daily vehicles outside AQMA</u> ).
	+	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 and/or noise 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 and/or noise at various times of the day. ( <u>E.g. more than 100 light daily vehicles within AQMA; more than 500 light daily vehicles outside AQMA</u> ).
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. None of site has any risk of surface water flooding. Groundwater levels more than 5m below ground.
	+	Site is PDL: Site is situated within Flood Zone 1 or partially in

		Flood Zone 2. <u>None of site has any risk of surface water flooding. Groundwater levels more than 5m below ground.</u> Site is greenfield: Site is situated within Flood Zone 1. <u>None of site has any risk of surface water flooding. Groundwater levels more than 5m below ground.</u>
	0	
	-	Site is PDL: Site is situated within Flood Zone 1 or 2. <u>Site has either a risk of SW flooding or has groundwater levels less than 5m below ground surface, but not both.</u> Site is Greenfield: Site is situated within Flood Zone 1 or 2. <u>Site has either a risk of SW flooding or has groundwater levels less than 5m below ground surface, but not both.</u>
	--	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 <u>and has risk of both SW and GW flooding.</u> Greenfield site: <u>site has risk of both SW and GW flooding.</u>
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; <u>or PDL site which will not result in any loss of green infrastructure or increase in urbanised form.</u>
	0	
	-	Greenfield site <u>or site with open space</u> 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	No buildings exist on site, <u>therefore development will not provide opportunity to make use of existing resources (buildings).</u>
	-	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 <u>or empty buildings</u> ; 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 <u>(not derelict or vacant)</u> . 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 400-800m; 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.
	--	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. <u>Good AQ and low levels of noise. Site will not result in loss of open space.</u>
	+	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. Site may have AQ or noise issues. Site may result in loss of open space.
	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. May result in loss of open space.
	--	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. May result in loss of open space.
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. (e.g. 10% least to 50% most)
	+	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 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 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 has excellent access to Strategic Road Network and/or sustainable forms of transport.

		Site within 2km from a broadband exchange.
	+	Site already in employment use, but provides a limited number of jobs and has limited potential to increase capacity. Site has good access to Strategic Road Network and/or sustainable forms of transport. Site within 2km from a broadband exchange
	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. <u>Or will result in loss of employment floorspace, but site derelict or vacant and not in use.</u> Site not located near to Strategic Road Network or nor sustainable forms of transport. Site located greater than 2km from broadband exchange.
	--	Will result in significant loss of jobs and/or land in existing employment uses. Site not located near to Strategic Road Network or nor sustainable forms of transport. Site located greater than 2km from broadband exchange.

### 3.12 Areas of Particular Environmental Importance

Schedule 4 (4) of the SEA Regulations requires any existing environmental problems which are relevant to the plan to be described, including in particular those designated in relation to the Birds Directive<sup>4</sup> and the Habitats Directive<sup>5</sup>.

Castle Hill, designated as a Special Area of Conservation (SAC) is located partially within the administrative boundary of Brighton & Hove, and partially within Lewes District Council administrative area. There are no other SACs or Special Protected Areas (SPAs) within Brighton & Hove. The following table sets out those that are located within the local and wider area.

**Table 3.3 Locally designated SACs and SPAs**

Site	Approximate distance from BH	Reason for designation	Issues and problems
Castle Hill SAC	Within boundary	Calcareous grassland and nationally scarce species	Undergrazing Fertiliser Use Air pollution – atmospheric nitrogen deposition <sup>6</sup>
Lewes Downs SAC	7km	Calcareous grassland and important assemblage of rare and scarce orchids	Game management: pheasant rearing Undergrazing Public access/disturbance Air pollution – atmospheric nitrogen deposition <sup>7</sup>

<sup>4</sup> EC Directive 79/409/EEC

<sup>5</sup> EC Directive 92/43/EEC

<sup>6</sup> <http://publications.naturalengland.org.uk/file/6520392904605696>

Arun Valley SAC SPA and Ramsar site	c.19.8km	Ramshorn snail Bewick's swan Waterfowl	Inappropriate water levels Invasive species Inappropriate ditch management Water pollution <sup>8</sup>
Ashdown Forest SAC and SPA	c.19.5km	Wet heathland Dry heathland Great Crested Newt European nightjar Dartford warbler	Change in land management Air pollution: atmospheric nitrogen deposition Public Access/Disturbance Hydrological changes <sup>9</sup>
Pevensey Levels SCA & Ramsar site	c.20km	Ramshorn snail Wetland plants and invertebrates	Inappropriate water levels Invasive species Water pollution

### 3.13 Habitats Regulations Assessment (HRA)

The formal requirement to carry out a HRA is set out within Article 6 of the EC Habitats Directive 1992 which was transposed into UK law by the Conservation of Habitats and Species Regulations 2010. The Conservation of Habitats and Species Regulations 2017 which came into force on 30 November 2017 has consolidated the Conservation of Habitats and Species Regulations 2010 with subsequent amendments.

It is a legal requirement for all local plans to be subject to a HRA. The aim of the HRA is to identify any aspects of the emerging City Plan Part Two that would have the potential to cause a likely significant effect on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), either in isolation or in combination with other plans and projects. HRA is essentially a two-part process consisting of an initial screening which assesses the likelihood of significant effects, followed by full Appropriate Assessment if the screening cannot rule out the likelihood of significant effects.

An HRA was undertaken during the preparation of City Plan Part One. The assessment discounted all possible impacts at the HRA screening stage, concluding that the City Plan would result in no likely significant effects on European sites. Since then, updated evidence, in particular in relation to the Ashdown Forest SAC and the potential for in-combination effects arising from increases in traffic flows from adjacent authority areas, has led to the need to carry out an HRA on City Plan Part Two.

An HRA screening was carried out on City Plan Part Two in May 2018 incorporating an assessment of likely significant effects on all the sites listed in Table 3.3. This screening concludes that there are no likely significant effects arising from the City Plan Part Two, alone or in-combination with other plans on the following sites:

- Castle Hill SAC
- Lewes Downs SAC
- Arun Valley SAC, SPA & Ramsar
- Pevensey Levels SAC & Ramsar

The screening concluded that it could not screen out the likelihood of significant effects on Ashdown Forest SAC/SPA relating to air quality/transport, although it screened out the likelihood of significant effects as a result of increased recreational pressure.

<sup>7</sup> <http://publications.naturalengland.org.uk/file/5534055007256576>

<sup>8</sup> <http://publications.naturalengland.org.uk/file/5185212862431232>

<sup>9</sup> <http://publications.naturalengland.org.uk/file/6679502935556096>

A full Appropriate Assessment will now be undertaken with regards to the potential for air quality impacts on Ashdown Forest and this will be considered in future SAs.

## **Section 4 Testing the Objectives of City Plan Part 1 against the Sustainability Appraisal Objectives**

### **4.1 Introduction**

This section tests the compatibility of the Objectives of the City Plan against the Sustainability Appraisal Framework as required by B1 of the SA process.

City Plan Part 1 (2016) and City Plan Part 2 when adopted will together form the Local Development Plan for the city. City Plan Part 1 sets out 23 strategic objectives and sets the strategy and overall approach to accommodating the development needs of the city to 2030. The SA undertaken during the preparation of CPP1 assessed the strategic objectives against the SA Framework. However, as the SA Framework has been revised during the Scoping Stage for City Plan Part 2, the strategic objectives should again be tested against the revised framework.

### **4.2 Testing the City Plan Strategic Objectives against the Sustainability Appraisal Framework**

The Strategic Objectives, as set out in CPP1, are as follows:

- SO1 Ensure that all major new development in the city supports the regeneration of the city, is located in sustainable locations, provides for the demands that it generates and is supported by the appropriate physical, social and environmental infrastructure.
- SO2 Support the continued improvement of the economic performance of the city by identifying and safeguarding an appropriate range of sites and premises to meet demands of high growth and key employment sectors and ensuring there is a well-trained and suitably skilled local workforce.
- SO3 Develop Brighton & Hove as a major centre on the South Coast for sustainable business growth and innovation, creative industries, retail provision, tourism and transport.
- SO4 Address the housing needs of Brighton & Hove by working with partners to provide housing that meets the needs of all communities in the city, achieves a mix of housing types, sizes and tenures that is affordable, accessible, designed to a high standard and adaptable to future change.
- SO5 Maintain and strengthen the role of Brighton city centre, improve its attractiveness and recognise and protect its unique cultural, tourism and retail mix and look to diversify the evening economy and leisure function.
- SO6 Through joint working with Adur District Council, West Sussex County Council and the Shoreham Port Authority, maximise the potential of Shoreham Harbour for the benefit of existing and future residents, businesses, Port-users and visitors through a long term regeneration strategy.
- SO7 Contribute to a reduction in the ecological footprint of Brighton & Hove and champion the efficient use of natural resources and environmental sustainability.
- SO8 Ensure design and construction excellence in new and existing buildings in Brighton & Hove which responds positively to the challenges posed by local impacts of climate change, resource-efficiency, and delivers biodiversity and environmental objectives and improvements to accessible natural green space.
- SO9 Make full and efficient use of previously developed land in recognition of the environmental and physical constraints to development posed by the sea and the South Downs.
- SO10 To support the implementation of the objectives of the Biosphere Reserve Management Strategy, such as the creation of green links between open spaces and the surrounding downland, changes in the design and management of spaces to create a functioning Green Infrastructure Network. To conserve and enhance the priority areas for biodiversity and to ensure that everyone has good access to and opportunities to be engaged with natural open space. Nature conservation opportunities in open spaces and in new development should be maximised to contribute to Local Biodiversity Action Plan objectives.

- SO11 Provide an integrated, safe and sustainable transport system to improve air quality, reduce congestion, reduce noise and promote active travel.
- SO12 Ensure design excellence which responds positively to the distinctive character of the city's different neighbourhoods and creates an attractive and accessible well-connected network of streets, spaces and buildings.
- SO13 Enhance and maintain the distinctive image, character and vibrant, varied heritage and culture of the city to benefit residents and visitors. Support the role of the arts, creative industries and sustainable tourism sector in creating a range of high quality infrastructure support facilities, spaces, events and experiences
- SO14 Conserve and enhance the South Downs National Park, including the promotion of an enhanced downland landscape which delivers Local Biodiversity Action Plan objectives; more sustainable farming practices and improved public access. Enhance and promote physical and sustainable transport links between the city and the Downs.
- SO15 Promote new opportunities for sport and recreation. Protect and enhance the quality and quantity of parks and green spaces in the city, formal and informal, improving their interconnectivity, enhancing their individual character, landscape and biodiversity to ensure that they are valued by the whole community and well used throughout the year.
- SO16 Preserve and enhance the city's recognised cultural heritage and bring vacant buildings of national or local architectural or historic interest back into appropriate uses. Ensure new developments contribute positively to their historic surroundings.
- SO17 Enhance the seafront as a year round place for sustainable tourism, leisure, recreation and culture whilst protecting and enhancing the quality of the coastal and marine environment.
- SO18 Maintain and enhance the distinct character and physical environment of the city's established network of shopping centres to ensure they remain vibrant, attractive and accessible.
- SO19 Contribute towards the delivery of more sustainable communities and the reduction of inequalities between neighbourhoods in Brighton & Hove.
- SO20 Contribute towards reducing inequalities experienced by different groups within the city and recognise the special needs of younger people, older people, disabled people, lesbian, gay, bisexual and trans people and black and minority ethnic people, gypsies and travellers, refugees and asylum seekers and people of different religions and belief in the provision and improvement of accessible and appropriate community facilities, healthcare, education, housing, safety and employment.
- SO21. Provide additional primary and secondary school places in response to growing demand and future increases in population by working with partners, including not for profit organisations, to build new schools and by expanding successful schools (where possible, with the consent of the school). Assist in the long term planning of higher and further education establishments, and ensure that they play a full part in the city's economic, social and environmental development.
- SO22 Across the city apply the principles of healthy urban planning and work with partners to achieve an equality of access to community services (health and learning), to opportunities and facilities for sport and recreation and lifelong learning. Ensure pollution is minimised and actively seek improvements in water, land and air quality and reduce noise pollution.
- SO23 Ensure that Brighton & Hove is a city where all people feel safe in public places and within their neighbourhoods through working with partners to create a safer environment, reduce crime and reduce the fear of crime.



The following matrix assesses the objectives against each other. A tick denotes where the impacts objectives are compatible. A cross denotes where the objectives are incompatible. Blank denotes no direct link.

Table 4.1: Comparison of the City Plan Strategic Objectives and the Sustainability Appraisal Objectives

Sustainability Appraisal Objectives	19	✓	✓	✓		✓	✓					✓		✓	✓		✓	✓	✓	✓	✓				
	18	✓	✓		✓		✓					✓							✓	✓	✓	✓	✓		
	17	✓				✓	✓					✓	✓				✓		✓		✓		✓		
	16	✓	✓		✓		✓	✓	✓		✓	✓	✓		✓	✓			✓	✓	✓	✓	✓	✓	
	15	✓	✓	✓		✓	✓					✓	✓		✓	✓		✓	✓	✓	✓	✓	✓		
	14	✓			✓		✓													✓	✓				
	13	✓	✓		✓		✓	✓		✓								✓						✓	
	12	✓	x	x	x		x	✓	✓	✓								✓							
	11	✓	x		✓		✓	✓																✓	
	10	✓			✓			✓	✓		✓														
	9	✓	x	x	x		x	✓	✓																
	8	✓					x		✓		✓								✓						
	7	✓	x	x	x		x	✓	✓		✓													✓	
	6	✓	x	x	x	x	x	✓				✓	✓		✓				✓				✓		
	5	✓	x	x	x	x	x	✓				✓	✓			✓				✓	✓	✓			
	4					✓							✓	✓			✓	✓	✓						
	3									✓	✓				✓	✓									
	2	✓			x				✓	✓	✓		✓		✓	✓		✓					✓		
	1	✓	x	x	x		x	✓	✓	✓	✓				✓	✓		✓							
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
			City Plan Strategic Objectives																						

### **4.3 Compatibility of sustainability objectives with City Plan Strategic Objectives**

When compared against the sustainability objectives there are possible incompatibilities. The Strategic Objectives that are concerned with growth have the greatest risk of incompatibility. In particular SO2, SO3, SO4, SO5, and SO6 may be incompatible with sustainability objectives covering the following topics: biodiversity, open space, reducing the need to travel, air/noise quality, water quality, flood risk, greenhouse gas emissions, soil quality and waste.

Further growth and development may lead to an increase in waste generation, energy consumption and water use, and may lead to an increase in car use which will have a negative impact on air and noise quality. In addition, development may impact on existing biodiversity, and may lead to loss of, or increased pressure on open space.

New developments in the city should:

- Incorporate biodiversity enhancements, which should endeavour to create green areas that can link to one another, to encourage movement of biodiversity across the city.
- Ensure that the open space requirements of the existing and future population are met.
- Providing measures which facilitate sustainable and active transport.
- Include measures to increase energy and water efficiency and reduce resource consumption.
- Ensure that flood risk is not increased elsewhere as a result of development.
- Include measures to improve and protect soil quality from further degradation.
- Ensure construction & demolition waste is reduced as far as possible and that facilities are provided to facilitate recycling and waste minimisation in developments.

The SA found that the remaining Strategic Objectives should ensure that the impacts as outlined above should be either reduced or minimised, and sufficiently incorporated the mitigation measures.

## Section 5 Options and Policy Appraisal

### 5.1 Introduction

This section summarises how the SA has considered alternative options for the preparation of CPP2, provides a brief summary of the results of the options appraisals, and summarises the results of the associated policy appraisals.

### 5.2 Assessment of Reasonable Alternatives

The SA is required to assess the impacts of the City Plan Part 2 and of reasonable alternatives to it. A number of alternative options have been considered for each policy and each appraised against the SA framework to help guide the most sustainable approach. Following this appraisal, the policy was drafted informed by the SA results.

Each table within this section contains a description of the options considered for each policy, a summary of key findings of the preferred option, the predicted short-term SA scores for the final policy and a description of the SA findings for final policy. The preferred option which formed the basis of the policy is shown in bold text.

The full options assessments, which also describe the “no plan” option, can be found in Appendix D. The full policy assessments can be found in Appendix G. Some of the assessments for the site allocations policies are largely informed by the results of the site assessments for relevant sites. The site assessment process is described in more detail in Section 6 and the individual site assessments for each site can be found in Appendix F.

All policy assessments are based on the individual policy itself and assumes that any developmental impacts, e.g. potential for increased resource use are addressed through implementation of strategic policy in CPP1 where relevant. Assumptions for individual policies are set out in more detail within the individual policy assessments in Appendix G.

### 5.3 Development Management Policies

<b>DM1 - Housing Quality, Choice and Mix</b>	
Options	<p><i>(nb: 2 sets of options were considered as this final policy incorporated the policy on amenity, which was originally a stand-alone policy.)</i></p> <p>A1) No specific policy but rely on the NPPF</p> <p>A2) Have individual policies in CPP2 covering the following separately: Housing Quality – addressing standards; Housing Choice; Housing Mix</p> <p><b>A3) Have a single policy in CPP2 covering housing quality, choice and mix</b></p> <p><b>B1) Policy to require the provision of useable private outdoor amenity space in new residential development.</b></p> <p>B2) Policy setting out more detailed specifications for private outdoor amenity space, such as minimum space standards for types of outdoor private amenity space by the type of residential development and/or the number of bedrooms/number of persons.</p>
Summary	<p>Either options A2 or A3 are the preferred option, with there being little difference between the two, mainly based on the assumption that the technical standards applied will be exactly the same in either approach. Both options have potential for significant positive impacts on the objectives for housing and health, with these options helping to deliver good quality of homes that meet a variety of housing needs, and also positive for equalities, as should ensure that the</p>

	housing and space needs of people with certain protected characteristics are met. Neither option B1 or B2 had any potential for adverse impact and there are some uncertainties with both options. Both will result in private outdoor amenity space and although there is more uncertainty with regards to the quantity/quality that would be delivered with option B1, option B2 could be inflexible and may restrict development. Option B1 is considered to be the more flexible and less restrictive approach and this may help bring development forward, having benefits for economic development as well as housing delivery and is the preferred approach.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+?	0	0	0	0	0	0	0	0	0	0	0	-	++	0	++	0	+	+
Summary	<p>The policy should have <u>significant positive impacts</u> for the objectives relating to housing and health, as should help to ensure a range of housing types are provided and that all housing is of a good quality, particularly in relation to size and access, as well as containing private outdoor space having benefits for well-being and delivering one of the wider determinants of health. The policy should also have <u>positive impacts</u> for the objective relating to equalities, as should result in the delivery of a proportion of housing which is suitable for wheelchair users, and through the delivery of accessible and adaptable homes, which could be of particular benefit of people with protected characteristics, including younger, older and ambulant disabled people. The policy should also have <u>positive impacts</u> for the economy objective, as should result in the delivery of a wide range of housing types that will help to meet a diverse populations' needs, contributing to wider economic growth.</p> <p>The policy could also have <u>positive impacts</u> for the biodiversity objective, as the outdoor space could be used to provide net gains or habitat for biodiversity, although will be dependent on implementation by the homeowner.</p> <p>The only objective where the policy was found to have potential for <u>adverse impact</u> is the objective relating to making the best use of land, as the standards for minimum floor-sizes may prevent smaller units from being delivered, and may result in fewer units being delivered on a plot when compared to not having the requirements in place.</p>																		

<b>DM2 - Retaining Housing</b>																			
Options	<p>1) Having no specific policy in CPP2</p> <p><b>2) Set out an 'in principle' general DM type policy that seeks to avoid a net loss of housing but provides for appropriate exceptions through criteria.</b></p>																		
Summary	Overall option 2 had greater potential for positive impacts than option 1, particularly on the most relevant and key objectives to this policy area, housing. Given the significant need for housing locally, a policy that helps retain housing in housing uses would have a significant positive effect and would have associated positive effects on health and equalities.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+	0	0	0	0	0	0	0	0	+	++	+	+	0	0	0
Summary	<p>The policy has potential for <u>significant positive impacts</u> on the objective for housing as seeks to retain existing housing provision, however allows for loss or change of use in certain circumstance, including where there would be a net gain in affordable units. The policy therefore contributes to meeting various housing needs in the city and improving housing standards.</p> <p>The policy also has potential for <u>positive impacts</u> on the objectives for heritage, access to services, making the best use of land, and health. The policy could result in the preservation of heritage assets and could result in increased provision of community facilities through allowing change of use, both of which may help to make the best use of land/buildings particularly where buildings are under-used/vacant. The policy could also lead to the improvement in the standard of some accommodation, as well as support delivery of affordable housing, which would impact positively on health.</p>																		

DM3 - Residential Conversions and Retention of Smaller Dwellings																			
Options	<p>1) No policy in City Plan.</p> <p><b>2) Criteria based policy to assess residential conversions and the retention of smaller dwellings.</b></p> <p>3) Incorporate issues regarding residential conversions into other policies, namely that which refer to National Space Standards (Housing Quality, Choice and Mix)</p>																		
Summary	<p>Option 2 is considered to have greater potential for more significant positive impact on the key objective for this policy area: provision of housing. A criteria based policy should provide greater certainty for applicants, may help to bring forward applications and should help to increase housing provision. This option should also help to retain a good mix of sizes of dwellings through the protection of smaller dwellings. This option 2 is also considered to have greater potential for more significant positive impact on making the best use of land available, as will increase land use efficiency and make better use of existing building stock; and on health, with housing being one of the determinants of health as well as potentially influencing the quality of housing delivered and providing the opportunity to consider impacts on residential amenity</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+	0	0	0	0	0	0	0	0	++	++	0	+	0	+	0
Summary	<p>The policy has the potential to have <u>significantly positive impacts</u> on the objectives making the best use of land and housing. The policy may help to bring forward successful conversion applications, help to increase the supply of housing from within the existing housing stock, making the best use of land and increasing housing provision. The policy also helps to ensure a range of housing sizes is maintained, including through the retention of existing smaller dwellings, but also through the requirement for newly converted dwellings to include a minimum of a two-bedroomed dwelling, helping to meet the needs of different sized households.</p> <p>The policy also has the potential to have <u>positive impacts</u> on health, with housing being one of the wider determinants of health, and also through ensuring that the size of housing does not fall below the nationally described space standards. The policy may also have positive impacts on built heritage, through the exception to policy criteria which would result in the preservation of a listed building. The policy may also have <u>positive impacts</u> on equalities as could help in delivery of housing for people with specialist housing needs, which could include people with protected characteristics.</p>																		

DM4 - Housing and Accommodation for Older Persons																			
Options	<p>1) No specific policy but rely on NPPF (para 50)</p> <p><b>2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing</b></p> <p>3) Have a single policy in CPP2 covering older persons and specialist housing</p>																		
Summary	<p>Option 2 has greater potential for more significant positive impacts. In particular, option 2 has greater potential for more significant positive impacts on the objective for housing, health and equalities, with this option providing the opportunity to allow for greater consideration of the specific housing needs, issues and requirements of different groups of people, including those with protected characteristics.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	+	0	0	+	+	0	0	0	0	0	0	0	++	+	++	+	++	0
Summary	<p>The policy should have <u>significantly positive impacts</u> for the objectives relating to housing, health and equalities. The policy should help to ensure the housing needs of older people are</p>																		

	<p>met through support for a range of different types of housing and affordable housing that complies with current quality standards. The provision of quality and suitable housing has health benefits in itself, and housing specifically for older people could help to support and manage the health needs of older people. The requirement for development to provide spaces that would enable community interaction also contributes towards good mental health and well-being and can help to reduce the risk of isolation. The policy may also indirectly free-up larger properties in the city that are being under-occupied through helping to provide suitable move-on accommodation, which has positive implications for the wider housing market. The policy should also have <u>positive impacts</u> on the objectives for open space, reducing the need to travel, air quality, access and community safety, although impacts on this objective were fairly uncertain. The policy should lead to delivery of open spaces within the developments, providing opportunities for community interaction and passive surveillance, potentially supporting community safety. The policy should also help to ensure that developments are sustainability located in relation to public transport and local facilities, which will enable access to services and may help to reduce the need to travel by car, having air quality benefits.</p>
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<b>DM5 - Supported Accommodation (Specialist and Vulnerable Needs)</b>																			
Options	<p>1) No specific policy but rely on NPPF (para 50)  <b>2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing</b>            3) Have a single policy in CPP2 covering older persons and specialist housing</p>																		
Summary	<p>Option 2 has greater potential for more significant positive impacts. In particular, option 2 has greater potential for more significant positive impacts on the objective for housing, health and equalities, with this option providing the opportunity to allow for greater consideration of the specific housing needs, issues and requirements of different groups of people, including those with protected characteristics.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+	++	0	++	0
Summary	<p>The policy should have <u>significantly positive impacts</u> for the objectives relating to housing, health and equalities. The policy should help to ensure the housing needs of people with specific housing needs, including disabled people, are met through support for housing that complies with current quality standards. The provision of quality and suitable housing has health benefits in itself, and housing specifically for certain people could help to support and manage their particular health needs.</p> <p>The policy should also have <u>positive impacts</u> on the objectives for reducing the need to travel and access. The policy should also help to ensure that developments are accessible, which will enable access to services and may help to promote sustainable travel.</p>																		

<b>DM6 - Build to Rent Housing</b>	
Options	<p>1) Don't include a build to rent policy in CPP2, but rely on emerging national guidance in draft NPPF and PPG.</p> <p>2) Include a build to rent policy including the minimum affordable housing requirements set out in the draft PPG (i.e 20% affordable housing at a minimum rent discount of 20%) rather than reflecting Policy CP20 requirements (40% affordable housing at rent levels to be agreed with the council).</p> <p><b>3) Include a build to rent policy that seeks the provision of affordable housing in line with Policy CP20 (40% affordable housing at rent levels to be agreed with the council).</b></p>
Summary	Although all options should result in positive impacts across all relevant objectives, option 3 has

	greater potential for more significant positive impact for the housing, equalities and economic development objectives than other options, as this option should result in a greater proportion of affordable rented housing, which will help to meet the high demand and need locally, could help to reduce housing based deprivation through increasing access and affordability of housing, and could support economic development through the links between economic growth and housing and the potential to help with recruitment and retention of staff locally.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	0	+	0	0	0	0	0	0	0	0	++	0	++	0	++	+
Summary	<p>The policy should have <u>significant positive impacts</u> related to housing, health and equalities. The policy should help to ensure that this tenure of housing is delivered, including a proportion of affordable housing, helping to meet the housing needs of those in the rental market. The policy will enable delivery of one of the wider determinants of health and should ensure that housing is of a certain standard through links to DM1, also supporting health and well-being. The policy should also contribute towards reducing housing based deprivation through increasing access to and affordability of housing, and is also required to be adaptable and accessible, through links to DM1, supporting those with protected characteristics.</p> <p>The policy should also have <u>positive impacts</u> for transport and economic development. The policy could help reduce the need for people to commute into the city, due to the lack of availability of affordable housing, and could also help support economic growth, through supporting house-building and also through the possibility for recruitment and retention of staff to improve.</p>																		

<b>DM7 - Homes in Multiple Occupation</b>																			
Options	<p>1) No additional policy relating to HMOs in CPP2 – rely on CPP1 Policy CP21, part (ii)</p> <p>2) Policy seeking to protect existing HMOs and resist conversion to C3</p> <p><b>3) Policy to support conversion of existing HMOs to C3.</b></p>																		
Summary	<p>Option 3 has the most potential for positive impacts and is the preferred option. Whilst HMO development can still come forward with this option, also in accordance with CP21, this option provides support for conversion back to C3 where desired. This is considered to be the most flexible approach and will allow the market to respond to future changes if needed, could help to minimise issues associated with HMOs, such as transport and noise issues, and could also help to increase delivery of family type housing. However, it is acknowledged that HMOs provide an important source of lower-cost housing in the city and the widespread loss of this type of housing could result in an increase in housing in-affordability, although it is recognised that this issue is based on a number of other factors.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	- /+?	+	+	- /+	0	- /+	0	0	- /+	+	++	+	++	0	++	?
Summary	<p>The policy has potential to have <u>significant positive impacts</u> on the objective for health. Housing is one of the wider determinants of health and the policy should help to ensure different types of housing are provided in the city to meet ranging needs. In addition, policy criteria should help to minimise the amenity impacts associated with HMOs which can impact upon health, and the requirement for HMOs to meet space standards should prevent sub-standard accommodation from being delivered.</p> <p>The policy is found to have <u>positive but uncertain</u> impacts for the housing and equalities objectives. The policy shows support for the conversion of HMOs back to C3 dwellings, helping to increase provision of family housing in the city which is an identified need locally. It also supports new build and converted HMO development provided certain criteria are met which should ensure that this important source of low-cost housing is able to be delivered. However there is a certain degree of uncertainty on how readily new HMOs will come forward due to the</p>																		

	<p>various policy criteria that need to be met in addition to those within CP21 which could be overly restrictive. The impacts are similar for the equalities objective as could reduce the availability of lower-cost housing which could impact upon those on lower incomes or socio-economic deprived.</p> <p>The policy has potential to have <u>positive impacts</u> on the objectives for transport, as may help to minimise impacts associated with increased localised car-ownership; air/noise quality, as may help to minimise noise amenity impacts; making the best use of land, as may help to make better use of existing stock through adaptive re-use and through provision of family housing which is difficult to deliver due to land constraints; and for access to services as could help to prevent certain services from becoming unviable.</p> <p>There is potential for <u>mixed impacts</u> on the objectives for water quality, greenhouse gas reduction and waste. Conversion from HMO into C3 dwelling could lead to reductions in resource consumption and waste production per dwelling, whereas change of use to HMO use could increase consumption when compared to the original dwelling.</p> <p>There is also potential for <u>mixed and uncertain impacts</u> for heritage and would be dependent on whether a building was listed or not.</p> <p>Impacts for economic development are <u>uncertain</u>, as the policy could result in a lack of HMO accommodation and less choice in accommodation for young professionals impacting upon workforce, although this is unknown.</p>
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<b>DM8 - Purpose Built Student Accommodation</b>																			
Options	1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA 2) Criteria based policy with no preferred sites identified <b>3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.</b>																		
Summary	<p>Overall Option 3 had the most potential for positive impacts across the greatest range of sustainability objectives, in particular for housing as it provides greater certainty where PBSA would be supported which may help to bring forward development and reduce reliance on the HMO market, and also for access to services and making the best use of land as could help to ensure the competing development needs of the city are met.</p> <p>All options were found to have potential for adverse impacts against some of the environmental site-based objectives although Options 2 and 3 would provide the opportunity to address any site specific considerations. Option 2 was considered to offer greater flexibility and the ability to respond to changing markets when compared with Option 3. However this approach lacked certainty for developers with the risk that suitable sites may not come forward resulting in continued reliance on the HMO market to meet students' housing needs.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-	-	0/-	+	++	++	0	-	0	-	0	0	+	++	+	+	+	0	+
Summary	<p>The policy has potential to have <u>significant positive impacts</u> on objectives for transport, air/noise quality and housing. The policy should reduce the need to travel by car and promotes active travel, through the locations of PBSA either on campus or on sustainable transport routes (in accordance with CP21), having associated positive impacts for air quality. Location of PBSA should also reduce the risk of incompatibility of uses and reduce the risk of noise issues. The policy should help to bring forward successful applications and should help to boost supply of PBSA. This may also help to reduce reliance on the need for student HMOs, helping to protect housing in C3 uses.</p> <p>The policy also has potential to have <u>positive impacts</u> on the objectives for making the best use of land, increasing access, improving health, improving community safety and economic development. The policy should help to strike a balance between competing development needs of the city, and through the delivery of PBSA would help to make better use of land when compared with the alternative of housing students within HMOs. The location of PBSA within</p>																		



	<p>areas with good transport links should help increase access to services for those students. The policy should help minimise the risk of adverse amenity impacts and help to protect the health of occupants through design and size of units. Policy requirements should help ensure occupants are safe and secure, and delivery of PBSA helps to contribute towards ensuring he city remains attractive to students, impacting positively on the local economy.</p> <p>There is potential for <u>adverse impacts</u> on some of the site based objectives including biodiversity, open space, SDNP, and flood risk due to the preferred locations for PBSA. PBSA could increase recreational pressure on nature conservation sites near the university campus; could result in losses of open space on university campus; could have impacts on sensitive landscape and could be located within areas of flood risk.</p>
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<b>DM9 - Community Facilities</b>																			
Options	1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies) 2) General policy to protect all community facilities (including pubs) <b>3) Specific policy to protect community facilities and additional specific policy to protect pubs</b>																		
Summary	Either option 2 or 3 are considered to be the preferred approach with both having potential for positive impacts for health, community safety and social inclusion, with option 3 likely to result in more significant positive impacts. Both options 2 and 3 had more potential for positive impacts for reducing the need to travel and access compared with option 1, as should enable community's to access facilities locally.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+?	++	+	0	0	0	0	0	0	+	0	++	++	+?	+	+
Summary	<p>The policy has the potential to have <u>significantly positive impacts</u> on the objectives relating to reducing the need to travel, improving access to services and improving health. The policy should result in new community facilities being located in areas with good sustainable transport links and close to where they are required, which will reduce need to travel and improve access. Delivery of new facilities, as well as protection of existing facilities will ensure there is adequate provision of a range of services, including health, helping to improve and increase access to services, as well as providing opportunities for community interaction, having health and social benefits.</p> <p>The policy also has the potential to have <u>positive impacts</u> on the objectives relating to heritage, air quality, best use of land, community safety, equalities and economic development. The policy could help to bring vacant or under-utilised buildings back into viable uses, potentially having heritage benefits as well as helping to make the best use of building stock. The policy should help to reduce the need to travel, also having benefits for air quality. The delivery of community facilities provides the opportunity for community interaction which could help promote community safety, can help support delivery of services which meet the needs of people with protected characteristics, as well as providing opportunities for education which helps reduce deprivation. Finally, community facilities can provide opportunities for employment and can help to maintain vitality of neighbourhood centres depending on their location. The policy approach of allowing change of use could also have positive impacts on economic development through allowing opportunities for regeneration. Impacts on heritage and community safety are fairly uncertain.</p>																		

<b>DM10 - Public Houses</b>	
Options	1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies) 2) General policy to protect all community facilities (including pubs) <b>3) Specific policy to protect community facilities and additional specific policy to protect pubs</b>
Summary	Either option 2 or 3 are considered to be the preferred approach with both having potential for

	positive impacts for health, community safety and social inclusion, with option 3 likely to result in more significant positive impacts. Both options 2 and 3 had more potential for positive impacts for reducing the need to travel and access compared with option 1, as should enable community's to access facilities locally.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+?	+	0	0	0	0	0	0	0	+	0	++	++	+	+?	+
Summary	<p>The policy has the potential to have <u>significantly positive impacts</u> on the objectives relating to access to services and health. The policy will result in the protection of pubs, or provision of community facilities where change of use is allowed, and will only allow change of use where the local community no longer needs provision and there is alternative provision locally. This will help to maintain access to these services and can also help to contribute to increasing or maintaining the vitality of the wider area through footfall. The protection of pubs will ensure that there are ongoing opportunities for social and community interaction, supporting general well-being.</p> <p>The policy has the potential to have <u>positive impacts</u> on the objectives relating to heritage, reducing the need to travel, making the best use of land, community safety, equalities and economic development. The policy could help to bring vacant sites back into viable uses, potentially having heritage benefits as well as helping to make the best use of existing building stock. The policy should help to protect pubs helping to reduce the need to travel to alternative premises. Pubs provide opportunities for social interaction, benefiting community safety, and where change of use is permitted, this could help to reduce the fear of crime if the site was previously derelict/vacant. Pubs can also provide a venue to deliver services for people with protected characteristics. Finally, pubs provide employment opportunities and can help to increase footfall to an area, having economic benefits. Impacts on heritage and equalities are also uncertain as will depend on the site and the services provided.</p>																		

<b>DM11 - New Employment / Business Floorspace</b>																			
Options	<p>1) No detailed development management policy to guide new employment/ business floorspace instead rely on guidance set out in strategic allocations; Policy CP2 Sustainable Economic Development as well as generic guidance in NPPF and NPPG.</p> <p><b>2) Detailed development management policy to guide proposals containing new employment/ business floorspace.</b></p>																		
Summary	Option 2 has potential for greater positive impact than option 1 for some objectives, including ensuring the best use of land, and supporting long term economic growth through delivery of more flexible workspace, which are the key objectives for this topic area.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	-	0	-	-	0	0	0	0	-?	+	++	0	0	+	0	+	++
			/+?		/+	/+													
Summary	<p>The policy has potential to have <u>significantly positive impacts</u> on the objectives relating to making the best use of land and economic development. The policy supports change of use, which could help to bring back vacant/under-utilised buildings back into active uses, should lead to higher density redevelopments, particularly on older industrial estates, and should lead to more flexible development that can be sub-divided and re-configured in order to respond to any future market changes. All of these requirements contribute towards making better use of buildings and land. The policy requirements should lead to delivery of high quality, flexible B1a, B1b and B1c units and higher density industrial units that are flexible to and suitable to meet a range of business needs, and respond to future changes in the market and therefore support economic growth.</p> <p>The policy also has potential to have <u>positive impacts</u> on the objectives relating to health and equalities. The policy should help facilitate employment opportunities, which is one of the</p>																		

	<p>wider determinants of health and could help to reduce employment based deprivation. The policy could also have <u>positive impacts on waste</u> as the policy supports change of use which would be a good use of existing resources.</p> <p>The policy has potential to have <u>mixed positive and negative impacts</u> on the objectives relating to SDNP, travel, and air/noise quality. Some of the industrial estates are located adjacent to the SDNP boundary, and new development in these locations could provide the opportunity to improve buildings located within the setting, however could also have adverse landscape impacts. The policy could result in an increase in employment-based transport movements, having associated air quality impacts, although could help to reduce out-commuting with transport impacts being largely dependent on location of development.</p> <p>The policy also has potential to have <u>adverse impacts</u> on soil quality. Some employment uses, particularly those located on industrial estates could result in land contamination.</p>
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<b>DM12 - Primary, Secondary and Local Centre Shopping Frontages</b>																			
Options	<p>1) No policy framework to guide new and appropriate uses within the Primary, Secondary and Local Shopping Frontages of the Regional, Town/District and Local Centres</p> <p><b>2) Criteria based policy to assess changes of use within the Primary, Secondary and Local Shopping Frontages of the Regional, Town/District and Local Centres</b></p> <p>3) Have a single policy to assess changes of use for all retail areas.</p>																		
Summary	<p>Option 2 is the preferred approach. In particular, this option should have a significant positive impact on the key objective for this topic area: economic development. This option should result in a balanced mix of A uses that is appropriate to the type of retail centre and recognises the importance of maintaining a predominance of A1 uses the regional centre, helping to maintain economic vitality, vibrancy and footfall, having economic benefits, as well as contributing to community safety; may help to reduce the need to travel and improve access to services; and could help to make the best use of land available.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+	+	+	0	0	0	0	0	0	-	0	++	+	-	+	++
													/+				/+		
Summary	<p>The policy could have <u>significant positive impacts</u> for the objectives for access to service and economic development. The policy should ensure there is a balanced mix of uses in all retail parades and recognises the importance of the Regional Centre and the need to provide a greater proportion of A1 uses in this centre. The policy will enable communities to meet their various needs within their local area, and should ensure the ongoing vibrancy, vitality and activity within all centres, having economic benefits.</p> <p>The policy could have <u>positive impacts</u> for the objectives for heritage, reducing the need to travel, air quality, health and equalities. The policy may help to prevent vacancy in certain centres, by allowing change of use, and this could be of heritage benefit where premises are located within listed buildings or conservation areas. The policy will help to ensure a balanced mix of uses and may reduce the need to travel further to access these services, also having air quality benefits. The policy will ensure a certain amount of A1 uses remain in all centres, providing opportunities to access food locally, having health benefits, and also supports change to some D uses which may increase access to health. By ensuring a balanced mix of uses, particularly in local centres, will benefit those who may not be able to travel further, e.g. disabled people, older and young people, having equalities benefits.</p> <p>The policy could have <u>mixed positive and negative impacts</u> for the objectives for making the best use of land and community safety. The policy may lead to temporary vacant premises particularly in local centres, which may not be making the best use of land available, and may increase the fear of crime or anti-social behaviour. However, the policy should also ensure an appropriate balance of mixes and reduce the risk of a predominance of any one type of use,</p>																		

	which is making a good use of land; and should help to ensure centres remain vibrant, active, continuing to attract users and ensure footfall, which will support community safety through passive surveillance and activity.
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<b>DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units</b>																			
Options	<p>1) No policy framework to guide new and appropriate uses within ILPs, Neighbourhood Parades or individual shop units</p> <p><b>2) Criteria based policy to assess changes of use within ILPs, Neighbourhood Parades or individual shop units</b></p> <p>3) Have a single policy in CPP2 covering all retail areas</p>																		
Summary	<p>Option 2 has the most potential for positive impacts, with some impacts having potential to be significant. In particular, this option should help to make the best use of land, through ensuring a balanced mix of uses required in ILPs and NPs, should enable local communities to access services and meet their needs locally, helping to reduce the need to travel, having benefits for air quality. Having a balanced mix of uses should support economic development and facilitate footfall to an area.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+	+	+	0	0	0	0	0	0	+	0	++	+	+	+	+
Summary	<p>The policy should have <u>significant positive impacts</u> on the objectives for access to services. The policy should ensure there is a balanced mix of uses in local parades which will enable communities to meet their various day to day needs within their local area.</p> <p>The policy should have <u>positive impacts</u> on the objectives for heritage, reducing the need to travel, air quality, best use of land, health, community safety, equalities and economic development. The policy could help to reduce vacancy through allowing change of use, and this could help contribute towards enhancing or improving heritage assets where relevant. It should ensure that communities can meet some needs locally, thus reducing the need to travel for some journeys, also having benefits for air quality. It contributes towards making the best use of premises, by preventing over concentration or under provision of certain uses and also allows changes of use which should help to reduce vacancy. The policy should help to ensure that communities have local access to food, having benefits for health and also that parades continue to serve their local area, particularly benefiting people who may not be able to travel farther afield, such as older people and disabled people. Through supporting a balanced mix of uses, the parades should continue to attract people, thus helping to reduce the fear of crime and also promoting economic activity in the area.</p>																		

<b>DM14 - Special Retail Area - Brighton Marina</b>																		
Options	<p>1) No policy framework to guide new and appropriate uses (<i>including change of uses</i>) within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1) and the seafront but rely on NPPF and high level policies CP4 (Retail Provision) and DA2 ( Brighton Marina, the Gas Works and Black Rock Area) and SA1 The Seafront in CPP1</p> <p><b>2) Criteria based policy to assess changes of use within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1)and within the seafront (SA1)</b></p> <p>3) Have a single general policy in CPP2 covering retail frontage and changes of use</p>																	
Summary	<p>Option 2 is considered to be the preferred approach. This option should help deliver a range of uses that reflects the special nature of the Marina location, should help to bring about a range of uses that will contribute towards ensuring people can meet their needs locally which will become increasingly important as the Marina population increases, may help to reduce the predominance in any one type of use increasing the attractiveness of the Marina as a destination, and should bring certainty for applicants.</p>																	

Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	0	+	0	0	0	0	0	0	0	+	0	++	+	+	0	++
Summary	<p>The policy has potential for <u>significant positive impacts</u> on the objectives for improving range and access to services and economic development. The policy allows change of use to other uses that may be more traditionally located within local retail centres, such as A2 services and D1 doctors. This will help to increase the range of uses and services available within the Marina leading to a more balanced mix which will become increasingly important as the resident population increases. The policy may also help to increase footfall to the area and viability of existing providers, having economic benefits.</p> <p>The policy also has the potential for <u>positive impacts</u> on the objectives for transport, making the best use of land, improving health and improving community safety. The policy should lead to a wider range of local services which can help to reduce the need to travel for the local population; should result in a more balanced mix of uses and may help to reduce the risk of vacancy helping to make the best use of land; may improve access to health services such as doctors and dentists; and may help to increase footfall and pedestrian activity, supporting community safety.</p>																		

<b>DM15 - Special Retail Area - The Seafrost</b>																			
Options	<p>1) No policy framework to guide new and appropriate uses (<i>including change of uses</i>) within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1) and the seafront but rely on NPPF and high level policies CP4 (Retail Provision) and DA2 ( Brighton Marina, the Gas Works and Black Rock Area) and SA1 The Seafrost in CPP1</p> <p><b>2) Criteria based policy to assess changes of use within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1)and within the seafront (SA1)</b></p> <p>3) Have a single general policy in CPP2 covering retail frontage and changes of use</p>																		
Summary	<p>Option 2 is considered to be the preferred approach. This option should help deliver a range of uses that reflects the special nature of the seafront location, should help to bring about a range of uses that will contribute towards ensuring people can meet their needs locally and may help to reduce the predominance in any one type of use increasing the attractiveness of the seafront as a destination.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-	+	0	+	-	-	0	+	0	0	0	0	+	0	+	+	+	0	++
Summary	<p>The policy has potential to have <u>significant positive impacts</u> on the objective for economic development. The policy should support the enhancement and further regeneration of the seafront, should help to increase footfall and help to ensure the seafront remains an attractive destination having benefits for the economy.</p> <p>The policy has potential to have <u>positive impacts</u> on the objectives for open space, heritage assets, reducing flood risk, making the best use of land, improving the range of services, improving health, and improving community safety. The policy supports new sport or leisure proposals within the seafront, having benefits for outdoor sports provision; should help to integrate new development into the historic environment; directs development to areas of lower flood risk and encourages less vulnerable uses; supports changes of use and encourages temporary uses, helping to make the best use of premises and increasing provision of various uses. The policy supports proposals that complement existing sports and leisure uses and may help to increase awareness of existing sports, having health benefits, and may help to improve community safety through increasing footfall and seasonality across less visited areas of the seafront.</p> <p>The policy has potential for <u>adverse impacts</u> on the objective for biodiversity, transport and air/noise quality. Development in this location could directly impact upon the Volk's Railways</p>																		

	SNCI/LWS, as well as indirectly through increased recreational pressure. Development could increase journeys made to the seafront by less sustainable forms of transport, adding to congestion and other transport-related impacts. Impacts for the air/noise quality objectives are considered to be mixed, due to the policy requirements for developments to consider noise amenity impacts.
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DM16 – Markets																			
Options	1) No policy framework to assess permanent market applications <b>2) Criteria based policy to assess new permanent markets or extensions to existing markets with no preferred sites identified</b> 3) Pro-active policy with appropriate permanent market sites identified																		
Summary	Both Options 2 and 3 performed equally well against a range of sustainability objectives. Option 3 could result in greater positive impact than option 2 on some objectives, including those relating to heritage, flood risk and soil quality, although this would depend on the site identified. Option 3 could result in more significant economic benefits than Option 2 due to the greater certainty created by identifying sites, however option 2 could be more flexible. Either options 2 or 3 are considered to be the preferred approach.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	-/+	+	+	0	0	0	0	0	0	?	0	++	+	?	0	++
Summary	The policy has potential to have <u>significant positive impacts</u> for access and economic development. New market development will be located within the defined retail areas where sustainable access is already good and will also increase provision of services. Markets can have numerous economic benefits including helping to regenerate areas, increasing footfall, and providing opportunities for employment. The policy has the potential for <u>positive impacts</u> for the objectives relating to travel, air quality, and health. The location within defined retail areas where public transport is good should help reduce the need to travel by car. Markets can help increase access to food, as well as provide an opportunity for social interaction, having health benefits. The policy has potential for <u>mixed impacts</u> on the heritage objective. Some of the retail areas have heritage designations: markets could therefore have a positive impacts on heritage assets, e.g. through bringing vacant buildings back into active uses; however could have adverse impacts, e.g. through poor design. The policy requirement for market development to be located within the defined shopping centres helps to clarify that there will be <u>no impacts</u> on certain site based objectives, including biodiversity, open space and the SDNP.																		

DM17 - Opportunity Areas for New Hotels and Safeguarding Conference Facilities	
Options	1) No additional policy to manage visitor accommodation in the city and no further hotel site allocations; no reduction in Hotel Core Zone; no reference to safeguarding large scale conference and banqueting facilities within existing Hotels. (E.g. CPP1 CP6 only). 2) Identify sites suitable for hotels to meet the high growth forecast demand for new hotels over the plan period; amend Hotel Core Zone and include policy provision safeguarding large scale conference and banqueting facilities within existing Hotels and include reference to short term lets in the Retaining Housing policy <b>3) Additional policy identifying opportunity areas for search for new hotels guided by low growth forecast; update Hotel Core Zone; include policy provision in CPP2 to safeguard large scale conference and banqueting facilities within existing Hotels and reference to short term lets in the Retaining Housing policy</b>
Summary	Option 3 provides greater potential for positive impact. In particular this option is the most

	beneficial for economic development as provides certainty to hotel developers which could help to bring forward hotels, would enable the city to remain competitive, supporting the visitor and wider economy. This option also helps to the best use of land, through retaining flexibility and allowing the market to decide which sites to bring forward, preventing the risk of sites being undeveloped. The proposed amendment to the retaining housing policy would also be beneficial for housing as could help prevent permanent loss of C3 housing to short-term holiday lets. This option also provides greater certainty over the broad location of sites when compared with option 2 impacting more positively on site based objectives, however it is likely that most sites based impacts could be mitigated with all options, making this less of a consideration.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-	0	0	-	+	+	-	-	0	0	?	-	+	0	0	0	+	0	++
Summary	<p>The policy was found to have <u>significant positive impacts</u> for the economic development objective as the policy may help to bring forward new hotel development within the search areas, enabling the city to meet the accommodation needs of tourists, potentially attract new markets and contribute towards increasing the visitor economy and remaining competitive. The policy should also safeguard existing conference facilities which is also a significant contributor to economic development locally. The policy should also ensure that the other requirements of DA policies can be achieved, e.g. delivery of employment land, also supporting economic growth.</p> <p>The policy was found to have potential for <u>positive</u> impacts for making the best use of land, as may help to bring forward development on derelict sites, or may help to intensity land-use within the strategic allocations, particularly as the policy still requires all other DA requirements to be delivered; and for community safety objective, as could help to increase activity and passive surveillance within the areas.</p> <p>The policy was also found to have potential for <u>positive</u> impacts for some of the site-based objectives including transport and air/quality, due to good access to existing sustainable transport.</p> <p>The policy was found to have potential for <u>adverse</u> impacts for some of the site-based objectives due to designations or issues within or adjacent to some of the areas of opportunity including biodiversity, heritage, water quality, and flood risk.</p> <p>Impacts were <u>uncertain</u> for soil quality, as it is unknown whether the search areas have potential for contamination.</p>																		

<b>DM18 - High Quality Design and Places</b>	
Options	<p>1) No specific, criteria-based policy to assess quality of design and making places better for people in the City Plan, in particular at street level (rely on CP12 and CP13)</p> <p><b>2) Progress Local Plan Policy QD1 and bring together guidance on place making into city-wide criteria-based policy</b></p> <p>3) Place making issues incorporated into other policies, including those for allocated sites/development areas</p>
Summary	Both options 1 and 2 result in similar significant positive impacts for the key objectives relating to this policy, including open space, heritage assets/townscape and health. Both options 1 and 2 also result in similar positive impacts for some other objectives including the SDNP. Option 1 has positive impacts across some of the environmental objectives, including biodiversity and transport, and some of the social objectives, including community safety and equalities due to existing policy requirements, whereas impacts for option 2 for these objectives are unknown, as these issues may be outside the scope of this topic area. However impacts could be positive if the policy included guidance of relevance to these objectives. Overall, options 1 and 2 have greatest potential for most positive impact.

Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	+	+	++	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0
Summary	<p>The policy has potential for <u>significant positive impacts</u> for the objectives relating to heritage and townscape. The policy should result in well-designed developments that contribute towards providing attractive streetscapes and townscapes, and that consider local context, including heritage assets.</p> <p>The policy has potential for <u>positive impacts</u> for the objectives for open space, SDNP, reducing the need to travel, health and community safety. The policy should help to result in open/public spaces that link in with the wider public realm, facilitating access to and between different sites; should result in well-designed developments that consider local context, including the SDNP where relevant; should support delivery of visually attractive developments that can promote well-being, as well as those which facilitate access which can help support healthy lifestyles; and delivery of spaces that have a purpose and provide opportunities for social interaction which can help to design out crime and support community safety.</p>																		

<b>DM19 - Maximising Development Potential</b>																			
Options	<p>1) No specific policy framework to ensure that new development maximises site potential and avoids the under-development of housing sites in the City Plan Part Two (rely on existing policy guidance – NPPF, NPPG and CPP1 policies or combination of other CPP2 policies)</p> <p><b>2) Introduce into CPP2 a city-wide, criteria-based policy</b></p> <p>3) Incorporate criteria into another CPP2 policy</p>																		
Summary	<p>Options 2 and 3 were found to have greater potential for more significant positive impact on the key objective to this topic area: making the best use of land available and housing. These are critical issues for the city due to the constrained nature of the city and the high need for housing. It is assumed that these options would not result in over-development and that impacts therefore on other planning considerations e.g. biodiversity, heritage, landscape, air quality, transport, flood risk, climate change would therefore be acceptable, reducing the risk of some of the adverse impacts discussed above, however this could be specifically referred to in the policy.</p> <p>Although the impacts for options 2 and 3 are broadly the same, in practice option 2 is likely to have greater potential for positive impacts where positive impact is predicted, as would potentially guidance provided in a stand-alone policy would be clearer. Option 2 is considered to be the preferred approach.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-	+	-	-	0	0	0	0	0	0	0	+	++	++	+	-	0	0	++
	/+?		/+?	/+?												/+			
Summary	<p>The policy has potential for <u>significant positive impacts</u> on the objectives for making the best use of land, housing delivery and economic development. The policy should lead to the development capacity of a site being maximised and sites being used efficiently for a range of uses, including housing and employment. This will help to make the best use of sites in the city and should increase provision of housing and employment space.</p> <p>The policy also has potential for <u>positive impacts</u> on the objectives for open space, waste reduction and access to services. The policy could indirectly help to reduce the pressure to develop other sites, including land in open space uses, by maximising use of a site, and the policy also seeks to ensure that development avoids inefficient open spaces being created on a site. The policy should result in efficient design and layouts, which may result in a more efficient use of resources and reduce waste. The policy also supports delivery of a mix of uses across a site, which could help to increase provision of services and access to them, depending on the type of uses delivered.</p> <p>The policy has potential for <u>mixed adverse and positive impacts</u> on the objectives for</p>																		



	biodiversity, SDNP, and heritage as maximising capacity on site could help to avoid the need to develop the most sensitive sites having positive impacts, however could mean that there is a greater risk of adverse impact on or near the site themselves. These impacts would depend upon the sensitivity of the site developed and are fairly uncertain. The policy also has potential for <u>mixed impacts</u> for health, as maximising potential on site could result in increased amenity impacts, although could help deliver greater amounts of development which can help meet various health determinants.
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<b>DM20 - Protection of Amenity</b>																			
Options	1) No specific policy framework to manage the protection of amenity in the City Plan Part Two (rely on existing policy guidance – NPPF, NPPG and CPP1 policies CP12, CP13 or combination of other CPP2 policies). <b>2) Progress Local Plan Policy QD27 into city-wide criteria-based policy.</b> 3) Amenity issues incorporated into other policies, including those for allocated sites/development areas.																		
Summary	Both options 1 and 2 had different merits. Option 1 could be seen as less restrictive, and this may help bring certain types of development come forward more easily having wider sustainability benefits. Option 2 had greater potential for more significant positive impact on the health objective than both other options, which is the key objective applicable to this topic area. Option 2 is likely to be the preferred approach.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	++	+	0	0
Summary	The policy has potential for <u>significant positive impacts</u> on the objectives relating to health. The policy should prevent unacceptable loss of privacy, outlook, and day/sunlight and should prevent overshadowing both for new occupiers of a development as well as those in existing buildings, having positive impacts on health and well-being. The policy refers to situations whereby over-looking could provide natural surveillance, potentially having <u>positive benefits</u> for community safety. The policy has potential for <u>adverse impacts</u> on the objective for making the best use of land. Protection of amenity could prevent certain types of development from coming forward which could include those which are of higher density/taller buildings, which could use the land available more efficiently.																		

<b>DM21 - Extensions and Alterations</b>																			
Options	1) No policy framework in CPP2 to manage the extensions and alterations policy in the City Plan (rely on general design policies in CPP1 (CP12, CP13), PD rights and building regs). <b>2) Progress Local Plan Policy QD14 and SPD 12 Design Guide for Extensions and Alterations into a single, city-wide policy in the City Plan (additional restrictions for Conservation Areas to be outlined via Heritage policies) (e.g. no SPD)</b> 3) Progress Local Plan Policy QD14 and elements of SPD 12 Design Guide for Extensions and Alterations into City Plan city-wide policy and review SPD12 to make it more flexible (additional restrictions for Conservation Areas to be outlined via Heritage policies).																		
Summary	Options 2 and 3 have potential for greater positive impact than option 1 for some of more critical objectives for this topic area, including heritage/townscape and health, as these options should provide clarity on design which can have positive effects for both townscape and health. Option 2 has potential for greater positive effect on these objectives, as all requirements would be within policy and not an SPD. Option 2 or 3 are likely to be the preferred approach for this topic.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Appraisal	0	0	+	+	0	0	+	0	+	0	0	0	+	+	0	+	0	0	+
Summary	The policy has potential for <u>positive impacts</u> on objectives relating to SDNP, heritage assets, water quality, greenhouse gas emissions, making the best use of land, housing, health and economic development. The policy should result in well-designed developments that help to protect and respect heritage assets and the setting of the SDNP, as well as helping to protect the health and amenity of neighbouring residents; supports development that is energy and water efficient; should help to make better use of land/building stock; and could help to improve housing and increase land for commercial uses.																		

<b>DM22 - Landscape Design and Trees</b>																			
Options	<p>1) No policy framework in CPP2 to address and protect landscape design and trees but rely on NPPF and high level policy CP10 Biodiversity, CP12 Urban Design, CP13 Public Streets and Spaces, CP16 Open Space.</p> <p><b>2) One criteria based policy addressing landscape design and trees</b></p> <p>3) Two policies in CPP2 : one for landscape design and one for trees and hedgerows similar to the Local Plan.</p>																		
Summary	Either options 2 or 3 are the preferred approach as both are likely to result in largely positive impacts, in particular for landscaping to deliver opportunities to improve biodiversity and open spaces in and around developments, and also through opportunities to contribute towards an improved built environment and streetscene.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Appraisal	++	+	+	+	0	+	+	++	0	++	0	0	+	0	0	++	0	0	0
Summary	<p>The policy should have <u>significant positive impacts</u> on the biodiversity objective. The policy should lead to the incorporation of biodiversity features into landscape design, should lead to the retention and protection of trees, particularly protected trees, and should result in incorporation of planting which is native and suitable for the site.</p> <p>The policy should also have <u>significant positive impacts</u> on the objectives for reducing flood risk, climate change adaptation and health. The policy should lead to landscape design that incorporates features which perform a natural function, such as SUDS, green roofs and other forms of green infrastructure. These have multiple environmental benefits including reducing flood risk and helping maintain urban temperatures, and therefore supporting climate change adaptation. Green infrastructure can improve environmental quality, including air and noise quality and can also provide the opportunity for informal physical activity, contributing towards healthy lifestyles. In addition, visually attractive landscape design can contribute towards supporting good quality of life and mental well-being.</p> <p>The policy should also have a range of <u>positive impacts</u> for objectives for open space, SDNP, heritage/townscape, air quality, water quality, and making the best use of land. Landscape design can help contribute towards a development's open space requirements, and good landscape design can help development integrate into its surroundings, which could include for example, the SDNP or the historic built environment, as well as helping to improve the streetscape. Features that are incorporated into landscape design perform natural functions, such as helping to improve air and noise quality, and could also help to make the best use of land, by helping to make more effective use of existing landscape features.</p>																		

<b>DM23 – Shopfronts</b>	
Options	<p>1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1</p> <p>2) No specific policy but rely on the NPPF, high level policy CP12 in CPP1 and retain existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)</p> <p>3) Include policy wording on shop fronts and advertisements in the Place Making policy.</p>

	<b>4) Have a specific policy in CPP2 on Shop Fronts and Advertisements supported by retained existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)</b>																		
Summary	Option 4 is the preferred approach. In particular, this option should have a significant positive impact on the key objectives for this topic area: objectives for the heritage assets/built environment and economic development. This option should result in well-designed shop-fronts, that take into consideration the surrounding built environment, including heritage assets, and that make a positive contribution to the street-scape, helping to support a thriving retail sector. This option could also result in positive impacts for community safety and equalities if the policy includes requirements that consider these issues in relation to shop fronts and advertisements.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	++	0	0	0	0	0	0	0	0	0	0	+	0	+	+	+
Summary	The policy should result in <u>significant positive impacts</u> for the heritage/townscape objective. The policy should result in well-designed shops that retain architectural details and ultimately contribute towards an improved streetscape. In addition, the policy should lead to the preservation or enhancement of the architectural and historic interest of shops within conservation areas or listed buildings where relevant, helping to protect the historic built environment. The policy should result in <u>positive impacts</u> for the objectives relating to access, community safety, equalities and economic development. The policy should result in measures which improve security and reduce fear of crime, and should help to improve access to premises for all. The policy may also have economic benefits through improvements to shops which contribute towards making an area more attractive and welcoming, potentially increasing footfall.																		

<b>DM24 – Advertisements</b>																			
Options	1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1 2) No specific policy but rely on the NPPF, high level policy CP12 in CPP1 and retain existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements) 3) Include policy wording on shop fronts and advertisements in the Place Making policy. <b>4) Have a specific policy in CPP2 on Shop Fronts and Advertisements supported by retained existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)</b>																		
Summary	Option 4 is the preferred approach. In particular, this option should have a significant positive impact on the key objectives for this topic area: objectives for the heritage assets/built environment and economic development. This option should result in well-designed shop-fronts, that take into consideration the surrounding built environment, including heritage assets, and that make a positive contribution to the street-scape, helping to support a thriving retail sector. This option could also result in positive impacts for community safety and equalities if the policy includes requirements that consider these issues in relation to shop fronts and advertisements.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
Summary	The policy should also result in <u>positive impacts</u> for the objectives relating to SDNP, heritage/townscape, community safety and economic development. The policy should ensure that advertisements outside the built up boundary do not have any adverse landscape impacts, and should prevent any light pollution in this location. It should result in well-designed advertisements that make a positive contribution to the streetscape and which do not cause harm to heritage assets. It should ensure that public safety is not compromised through poor design, siting or illumination, and should help to bring forward successful applications, which will help to promote economic activity.																		

<b>DM25 - Communications Infrastructure</b>																			
Options	1) No specific development management policy to assess telecommunications applications rely on the NPPF/NPPG and other City Plan Policies to address issues of heritage, amenity and appearance. <b>2) Criteria based telecommunications policy</b>																		
Summary	Option 2 is considered to have greater potential for positive impact than option 1, particularly against certain site-based objectives which cover important areas e.g. nature conservation designations. However this depends on the policy including certain criteria to address site specific matters.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	0	+	++	0	0	0	0	0	0	0	0	+	0	+	0	0	0	+
Summary	The policy should have <u>significant positive impacts</u> on the heritage objective and the built environment as should ensure heritage assets are conserved or enhanced. The policy should have <u>positive effects</u> for objectives for biodiversity and SDNP through requirements to ensure these various constraints are either conserved or enhanced; and for improving access to services, particularly to digital services, and supporting economic growth, due to the essential role that communications technologies play in the local and wider economy and the clarity the policy provides in terms of where development will be found acceptable. The policy should have a <u>neutral effect</u> on health, through the avoidance of any health effects that may result from telecoms infrastructure, such as increased radiation exposure.																		

<b>DM26 - Conservation Areas</b>																			
Options	1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD 3) Have a single policy in CPP2 covering all types of heritage asset. <b>4) Have a specific policy in CPP2 on Conservation Areas</b>																		
Summary	Option 4 had the potential for a stronger positive effect than other options on the key objective to this policy area: heritage, as a specific policy would allow for the specific planning considerations for Conservation Areas to be addressed, and also has the added benefit of addressing any local issues specific to these assets.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
Summary	The policy has potential for <u>significant positive impacts</u> on the objective relating to the historic built environment. The policy should result in the preservation and enhancement of conservation areas, should help to protect and strengthen local character and should ensure that existing character is taken into account through the range of criteria which must be considered when assessing proposals for alterations, changes of use, demolition and new development. In addition, the policy requires new development to be of high design quality. The policy also has potential for <u>positive impacts</u> on the objectives relating to biodiversity, open space, the SDNP, making the best use of land and economic development. The policy supports retention of trees and appropriately sized gardens which could help support biodiversity; could lead to the protection of open space that forms part of a conservation area designation; will lead to the preservation and enhancement of conservation areas including those which fall within or within the setting of the SDNP, and preserve or enhance key views which could include those of and from the SDNP; allows change of use which could help bring empty buildings back into use and make good use of existing building stock; and supports on going heritage based tourism which forms an important part of the local economy.																		

<b>DM27 - Listed Buildings</b>																			
Options	1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD 3) Have a single policy in CPP2 covering all types of heritage asset <b>4) Have a specific policy in CPP2 on Listed Buildings</b>																		
Summary	Option 4 had the potential for a stronger positive effect than other options on the key objective to this policy area: heritage, as a specific policy would allow for the specific planning considerations for listed buildings to be addressed, and also has the added benefit of addressing any local issues specific to these assets.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	++	0	0	0	0	0	0	0	+	+	+	0	0	0	0	+
Summary	The policy has potential for <u>significant positive impacts</u> on the objective relating to the historic built environment. The policy should result in the conservation and protection of listed buildings through supporting their retention in active uses, allowing change of use when vacant, and supporting them being kept in good repair. In addition, the policy permits proposals for extensions, alterations and changes of use provided there is no harm to the special interest of the building and provides clear criteria which must be considered. The policy also has potential for <u>positive impacts</u> on the objectives relating to waste minimisation, making the best use of land, housing and economic development. The policy should help reduce the risk of disrepair and demolition, helping to prevent production of waste materials; allows for change or use which would help bring empty buildings back into use and make good use of existing building stock; may enable householders to make alterations and extensions to their home which may improve the quality of their home or enable them to change it to meet changing housing needs; and supports on-going heritage based tourism through conservation of heritage assets which forms an important part of the local economy.																		

<b>DM28 - Locally Listed Heritage Assets</b>																			
Options	1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD 3) Have a single policy in CPP2 covering all types of heritage asset. <b>4) Have a specific policy in CPP2 on Locally Listed Heritage Assets</b>																		
Summary	Option 4 had the potential for a stronger positive effect than other options on the key objective to this policy area: heritage, as a specific policy would allow for the specific planning considerations for locally listed buildings to be addressed, and also has the added benefit of addressing any local issues specific to these assets.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	++	0	++	0	0	0	+	0	+	0	+	+	0	0	+	0	0	0
Summary	The policy has potential for <u>significant positive impacts</u> on the objective relating to the historic built environment. The policy should result in the retention and use of locally listed heritage assets, thus supporting their preservation. It also requires any new development, as well as alterations and extensions to locally listed assets, to be of a high design standard that respects the interest of the asset, and this should help to preserve their character. The policy also has potential for <u>positive impacts</u> on the objectives relating to biodiversity, open space, flood risk, climate change adaptation, and health. The positive impacts for these objectives are based on the fact that some open spaces are either a key component of, or form the main reason for a local listing. Therefore, as the policy could help to protect these open																		

	<p>spaces this has potential for various other indirect positive effects depending on the form and function of the open space, including biodiversity, reduction in flood risk and space for physical activity/mental well-being.</p> <p>The policy also has potential for <u>positive impacts</u> on the objective relating to making the best use of land, as the policy supports the continued use of assets, which would include supporting changing the use, and this could help to bring empty buildings back into use and make good use of existing building stock; and for waste minimisation as the policy strongly encourages retention and reuse of buildings, although does allow demolition.</p>
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<b>DM29 - The Setting of Heritage Assets</b>																			
Options	<p>1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1</p> <p>2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD</p> <p>3) Have a single policy in CPP2 covering all types of heritage asset.</p> <p><b>4) Have a specific policy in CPP2 on The Setting of Heritage Assets</b></p>																		
Summary	Option 4 had the potential for a stronger positive effect than other options on the key objective to this policy area: heritage, as a specific policy would allow for the specific planning considerations for the setting of heritage assets to be addressed, and also has the added benefit of addressing any local issues specific to these assets.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	+	++	0	0	0	+	0	+	0	0	0	0	0	+	0	0	+
Summary	<p>The policy has potential to have <u>significant positive impacts</u> on the objective relating to the historic built environment. The policy should result in the protection of the setting of heritage assets, encourages opportunities to enhance the asset, and supports the integration of new development into the historic built environment.</p> <p>The policy also has potential for <u>positive impacts</u> on the objectives relating to the SDNP and economic development. The policy may result in consideration and protection of downland and/or views of or from the SDNP that form part of the setting of heritage assets and consideration of these features will help to protect the SDNP and its setting. The policy will support on-going heritage based tourism that forms an important part in the local economy. The policy also has potential for <u>positive impacts, although fairly uncertain</u>, on the objectives relating to biodiversity, open space, flood risk, climate change adaptation, and health. The positive impacts for these objectives are based on the assumption that ecological features or open spaces could form a key component of the setting of heritage assets. Therefore the policy could help to protect these features which then leads to the potential for various other indirect positive effects including for biodiversity, reducing flood risk, maintaining urban temperatures and providing space for physical activity/good mental well-being.</p>																		

<b>DM30 - Registered Parks and Gardens</b>																			
Options	<p>1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1</p> <p>2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD</p> <p>3) Have a single policy in CPP2 covering all types of heritage asset.</p> <p><b>4) Have a specific policy in CPP2 on Registered Parks &amp; Gardens</b></p>																		
Summary	Option 4 had the potential for a stronger positive effect than other options on the key objective to this policy area: heritage, as a specific policy would allow for the specific planning considerations for the registered parks and gardens to be addressed, and also has the added benefit of addressing any local issues specific to these assets.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Appraisal	+	+	+	++	0	0	0	+	0	+	0	0	+	0	0	+	0	0	+
Summary	<p>The policy has potential to have <u>significant positive impacts</u> on the objective relating to the historic built environment. The policy should result in the preservation and enhancement of registered parks and gardens through permitting development which preserves the historic layout, character and components of the park and garden, and also by ensuring that views within or across the park and garden are considered. It is acknowledged that some temporary uses may be allowed which could temporarily harm the registered park and garden. However as these are temporary and will be subject to assessment, these are not considered to significantly affect the result.</p> <p>The policy also has potential for <u>positive impacts</u> on the objectives relating to biodiversity, open space, flood risk, climate change adaptation, and health. The policy could help to preserve or enhance the open spaces which form part of the designations, and this has potential for various other indirect positive effects depending on the form and function of the open space, including biodiversity, reduction in flood risk and space for physical activity/mental well-being.</p> <p>The policy also has potential for <u>positive impacts</u> on the objectives relating to making the best use of land and economic development. The policy supports temporary uses, which could make good use of land available in the city, particular for outdoor-type events; and the policy will result in the preservation and enhancement of heritage assets, e.g. the Royal Pavilion Estate that are a major contributing factor to heritage-based tourism, as well as allows temporary uses which could also contribute towards the local economy.</p>																		

<b>DM31 - Archaeological Interest</b>																			
Options	<p>1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1</p> <p>2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD</p> <p>3) Have a single policy in CPP2 covering all types of heritage asset.</p> <p><b>4) Have a specific policy in CPP2 on Archaeological Sites and Monuments</b></p>																		
Summary	<p>Option 4 had the potential for a stronger positive effect than other options on the key objective to this policy area: heritage, as a specific policy would allow for the specific planning considerations for both types of assets/sites to be addressed, and also has the added benefit of addressing any local issues specific to these assets and this is considered to be the key objective for this policy area.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	+	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
Summary	<p>The policy should have <u>significant positive impacts</u> on the heritage objective. The policy should ensure the appropriate protection of heritage assets with archaeological interest, by allowing development provided that it is not harmful to the assets or their settings. The policy should help to ensure that archaeological remains are suitably surveyed and that any archaeological sites/remains are preserved in situ where possible, or where not possible, that assets are appropriately recorded and stored, both of which will support greater understanding of local archaeology.</p> <p>The policy has potential to have <u>positive impacts</u> on the objectives for open space, SDNP, making the best use of land and economic development. Some Scheduled Monuments are located within areas of open space, and/or the SDNP, therefore protection of these assets indirectly will help to protect these areas of open space and/or the SDNP. Many ANAs are located within previously developed land, however as the policy supports development that does not harm the interest of the asset, the policy is not found to be unduly restrictive and may help bring forward appropriate development on areas of previously developed land, which will help to make the best use of land available in the city and support economic growth.</p>																		

<b>DM32 - The Royal Pavilion Estate</b>																			
Options	1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in a site specific SPD 3) No site specific policy but rely on a combination of other policies in CPP2 covering the different types of heritage asset. <b>4) Have a specific policy in CPP2 on The Royal Pavilion Estate</b>																		
Summary	Option 4 was considered to have greater potential for significant positive impact on objective 2: open space and objective 19: economic development. Options 3 and 4 were both considered to have potential for significant positive impact on the key relevant objective, objective 4: protection and conservation of the historic environment, although option 4 would allow more detailed site specific considerations.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Appraisal	+	+	0	++	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+
Summary	The policy should have <u>significant positive impacts</u> on the heritage objective. The policy should lead to the conservation and enhancement of the various heritage assets that comprise the Royal Pavilion Estate which includes listed buildings and the Registered Park & Garden, through the various measures which would be supported, and result in a more unified historic estate. The policy has potential to have <u>positive impacts</u> on the objectives for biodiversity, open space, transport, access, health, community safety, equalities and economic development. The policy should result in greater biodiversity within the gardens and improved quality of existing open spaces; should result in improved traffic management and improved infrastructure that facilitates pedestrian access; will indirectly provide opportunities for health-promoting activities, through facilitating access to open spaces, and should result in improved community safety. The policy has potential to have benefits for people with protected characteristics, through any improvements to access. The policy will also support economic development, through enhancing the Royal Pavilion estate which is a key draw to heritage-based tourism, and through support for temporary uses, which can have wider economic benefits.																		

<b>DM33 - Safe, Sustainable and Active Transport</b>																			
Options	1) No additional policy – rely on CPP1 Policy CP9 <b>2) Policy setting more detailed requirements regarding safe and sustainable/active travel</b>																		
Summary	Option 2 is considered to have greater potential for more significant positive impact for the safety objective due to this option being able to provide greater detail on specific measures for improving road safety, which is only addressed at a strategic level in CP9. It is recognised that option 2 is also likely to provide greater detail on measures which support walking, cycling and public transport than CP9, despite scoring the same across relevant objectives in this appraisal. Option 2 is considered to be the preferred approach.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Appraisal	0	?	?	0	++	++	0	0	+	0	0	0	0	0	+	++	++	++	+
Summary	The policy has potential for <u>significant positive impacts</u> for the objectives relating to reducing the need to travel by car, improving air quality, improving health, increasing equalities and improving community safety. The policy should ensure that developments contribute towards or provide measures which will facilitate safe and active travel on foot, by bike or by public transport, thus helping reduce the need to travel by car and having benefits for air quality and health. The policy should ensure the needs of people with protected characteristics are met through the delivery of improved public realm that consider the needs of all users as well as through the requirement for all developments to provide inclusive access. The safety of users is a consideration throughout, as are opportunities to design out crime. The policy has potential for <u>positive impacts</u> for the objectives relating to greenhouse gas																		



	<p>emissions, improving access, and contributing towards economic development. Policy could lead to a reduction in transport-based greenhouse gas emissions through reduced car-use, should improve access to services and facilities through improved pedestrian, cycling and public transport network, and should help to improve the local economy through reduced congestion and improved access to employment opportunities.</p> <p>The impacts of the policy on improving access to open space and the SDNP are <u>uncertain</u> and would be largely dependent on the location of development and whether access is improved.</p>
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<b>DM34 - Transport Interchanges</b>																			
Options	<p><b>1) General criteria based policy in support of developments</b></p> <p>2) Specific site allocations</p> <p>3) No policy</p>																		
Summary	<p>Option 2 would result in more certainty over a number of issues once the sites were known. However, if option 1 included criteria to ensure consideration of issues and the requirement for a range of site specific issues to be addressed, then option 1 should result in similar outcomes as the site allocation approach. Option 1 is considered to offer greater flexibility and ability to respond to changing markets than option 2. Option 1 has greater potential to make the best use of land and reduces the risk of allocated sites being left vacant if the market does not bring forward a scheme for that site, having greater economic benefits.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	+	+	-/+?	+?	-?	-?	+	-?	?	0	0	0	+	+	+	+	+
Summary	<p>The policy has potential to have <u>positive impacts</u> for the objectives relating to the SDNP, historic built environment, air quality, greenhouse gas emissions, access, health, community safety, equality, and economic development. The policy should help to protect the SDNP and the historic built environment through the requirement to minimise visual impacts and through the requirement to minimise travel through Conservation Areas. Air quality could be improved in central areas, particularly within the AQMA through both park &amp; ride and freight management, although may deteriorate again in the longer term if freed up road and parking spaces is taken up by cars again. Coach-parking and freight management could help to reduce transport based green-house gas emissions, although park and ride is unlikely to impact on this objective as this is likely to result in a displacement rather than a reduction in car-movements. Park &amp; ride could help to improve access, particularly for those in close proximity to sites. The policy could improve health, through the potential improvements to air quality and access and the policy is considered to address the potential for amenity impacts. The policy could lead to a reduction in city centre traffic, therefore contributing towards improving road safety in this location and contributes positively towards economic development. The policy is considered to address the needs of people with certain protected characteristics, having positive impacts for equalities.</p> <p>The policy has potential to have <u>mixed positive and negative impacts</u> for objectives relating to reducing the need to travel by car and encouraging sustainable travel. Certain elements of the policy should help to reduce congestion and promote sustainable travel, such as delivery of freight management centres and coach parking facilities. However, although park and ride may help to reduce city centre congestion, park and ride itself has been shown to result only in a displacement of car journeys rather than an overall reduction.</p> <p>Some of the <u>potential adverse impacts are fairly uncertain</u> and will depend of the location and type of site that is developed. For instance, there could be adverse impacts on objectives for water quality, flood risk and climate change adaptation. Development could be located on sites of a natural form, and therefore the urbanisation of these sites could increase the risk of surface water flood risk, having potential for adverse impacts on water quality, flood risk and climate change adaptation.</p>																		

<b>DM35 - Travel Plans and Transport Assessments</b>																			
Options	<p>1) No additional policy – rely on CPP1 Policy CP9 (para 2c: major development required to submit a TA and implement agreed Travel Plans)</p> <p><b>2) Policy regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans</b></p> <p>3) Guidance (e.g. SPD) regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans</p>																		
Summary	Option 2 has more potential for significant positive impact on a number of objectives when compared to options 1 and 3. This includes the key objectives for this topic area of transport, air quality and greenhouse gas emissions, as well as access, health and economic development.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	0	++	++	0	0	+	0	0	0	+	0	+	++	+	+	+
Summary	<p>The policy has potential for <u>significant positive impacts</u> on the objectives relating to reducing the need to travel by car, improving air and noise quality and improving health. The requirement for Transport Assessments, Transport Statements and/or Travel Plans for some developments, as well as the requirement for all developments to include measures that help to minimise car journeys should help to reduce or minimise adverse transport impacts associated with a development, should help to bring about measures which improve sustainable and active travel choice, should help to minimise car use and have citywide benefits in terms of contributing towards reducing congestion and other transport based issues, including air and noise quality issues, all of which will also have benefits for health. The policy has potential for <u>positive impacts</u> on the objectives relating to reducing greenhouse gas emissions, making the best use of land, improving access, improving community safety and economic development. Policy should lead to a transport-based greenhouse gas emissions being minimised, could help to make better use of sites within a development through minimising parking, and could help to improve road safety and the local economy through reduced congestion.</p> <p>The policy has potential for <u>positive uncertain impacts</u> on the objective relating to equalities/social inclusion. Policy should lead to sustainable transport measures which are more socially inclusive than the car, although this will be dependent on take-up by effected communities.</p>																		

<b>DM36 - Parking and Servicing</b>																			
Options	<p>1) No additional policy – rely on CPP1 Policy CP9 and the Parking Standards SPD</p> <p><b>2) Policy regarding the parking and servicing arrangements required to support new development (with standards from SPD set out in an Appendix)</b></p>																		
Summary	Both options should have positive impacts, however option 2 has more potential for significant positive impacts as the standards have greater weight when included within policy.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	0	++	++	0	0	+	0	0	0	+	0	+	+	+	+	+
Summary	<p>The policy has potential for <u>significant positive impacts</u> for the objectives relating to reducing the need to travel and improving air quality. The policy may help to influence car ownership and travel choice, potentially helping to reduce congestion, facilitate sustainable and low-carbon forms of transport, and minimise air and noise pollution.</p> <p>The policy has potential for <u>positive impacts</u> for the objectives relating to reducing greenhouse gas emissions, making the best use of land, improving access, improving health, improving community safety, increasing equalities and economic development. The policy could lead to</p>																		

	a reduction in transport-based carbon emissions due to the potential to influence mode of travel and also through incorporation of electric vehicle infrastructure; should help to reduce the land-take associated with parking; will enable access to services via sustainable transport and maintain provision for those who need/wish to travel by car; could help to improve health through improvements to air quality and facilitation of active travel; could help improve road safety through reduced congestion; should help to meet the parking needs of disabled people supporting equalities and also could also reduce the risk of transport based social exclusion in major developments; and could support economic development through the potential to reduce congestion and through provision of parking and access to destination uses which form part of the local economy.
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**DM37 - Green Infrastructure and Nature Conservation**

Options	<p>1) No policy framework in CPP2 to address and protect Green Infrastructure and nature conservation but rely on NPPF and high level policy CP10 Biodiversity, CP16 Open Space, CP17 Sports Provision and detailed SPD (SPD11 and SPD06).</p> <p><b>2) One criteria based policy addressing the different nature conservation designations, species protection and Green Infrastructure</b></p> <p>3) Have a number of policies in CPP2 so that there is one for each of the different designations, one for species protection and also one for Green Infrastructure</p>
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Summary	All options have potential for positive impacts across related objectives. However options 2 and 3 have greater potential for more significant positive impacts on the key objectives for this topic area, which are the objectives for biodiversity and open space due to the greater detail provided with these approaches.
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Policy Appraisal	<table border="1"> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td> </tr> <tr> <td>++</td><td>++</td><td>+</td><td>0</td><td>0</td><td>+</td><td>+</td><td>+</td><td>+</td><td>+</td><td>0</td><td>0</td><td>+</td><td>0</td><td>0</td><td>+</td><td>0</td><td>0</td><td>0</td> </tr> </table>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	++	++	+	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	0
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19																					
++	++	+	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	0																					

Summary	<p>The policy should have <u>significant positive impacts</u> on the biodiversity objective. The policy should lead to the protection and potential enhancement of a range of biodiversity including the NIA, protected and notable species which includes BAP species, important trees and all designated nature conservation sites. The policy should ensure that both non-designated and designated sites are protected and provides clear requirements regarding mitigation. The policy recognises the importance of the ecosystem services that green infrastructure provides. The policy should also have <u>significant positive impacts</u> on the open space objective. Protection for biodiversity purposes will also lead to the protection of the open space as many sites with a nature conservation designation, as well as those without a nature conservation designation but with biodiversity importance are also a designated open space.</p> <p>The policy should also have a range of <u>positive impacts</u> on objectives that relate to the ecosystem services provided by green infrastructure. This includes absorbing air pollutants, reducing noise, absorbing water, reducing flood risk and maintaining urban temperatures, having positive impacts for the objectives for air quality, water quality, flood risk, and climate change adaptation.</p> <p>The policy should also have additional <u>positive impacts</u> by helping to mitigate against climate change, as requires developments within nature conservation designations to achieve greater reductions in CO2 emissions, should help to make the best use of land available, through the requirement to retain ecosystem services, and could positively impact upon the SDNP through the protection of sites of nature conservation importance located within the SDNP that may also contribute to its landscape value.</p> <p>The policy should also have <u>positive impacts</u> for health, through protection of areas that provide opportunities for physical activity, through the improvement in environmental quality and due to the link between accessing the natural environment and good mental health and well-being.</p>
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DM38 - Local Green Spaces and Gateways																			
Options	<p>1) No policy framework to designate Local Green Space (LGS) sites in the City Plan</p> <p><b>2) Policy designating the four urban fringe sites: Hollingbury Park, Three Cornered Copse, Ladies' Mile and Benfield Valley; which received significant support from respondents to the City Plan Part Two Scoping Paper.</b></p> <p>3) Policy designating all the sites promoted by more than one individual in response to the City Plan Part Two Scoping Paper.</p>																		
Summary	<p>Option 2 is the preferred approach. In particular this option should have a significant positive impact on the key objective for this topic area: open space. This option provides greater protection of open spaces designated as LGS and may lead to open space improvements on these sites, but also should not significantly increasing the risk of development on a smaller number of open spaces without an LGS designation, due to the amount designated, as could be the case with option 3. Option 2 should also result in a significant positive impact for biodiversity, as the four sites all contain areas of ecological value, and the LGS designation may lead to greater ecological considerations. Other impacts are broadly similar to the other options and largely stem from the various benefits and environmental roles performed by open space.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	++	+	+	0	0	0	+	0	+	0	0	0	?	0	+	0	0	0
Summary	<p>The policy should have <u>significant positive impacts</u> for the objectives for open space. The policy should provide greater recognition of the importance of the open space, and may lead to improvements in the open space offer.</p> <p>The policy should have <u>positive impacts</u> for the objectives for biodiversity, SDNP, heritage assets, flood risk, climate change adaptation and health. All the sites designated contain elements of natural/semi-natural open space and some have an ecological designation, therefore the LGS designation may lead to greater consideration of ecological features of the sites. All sites are in close proximity to the SDNP and could act as potential gateways or result in improved links to the SDNP. Some sites contain or may be within the setting of heritage assets and therefore could result in protection or greater consideration of the assets.</p> <p>Protection of open space has indirect benefits due to their environmental function such as absorption of water, reduction of flood risk, and maintenance of urban temperatures. Access to open space contributes towards good physical health and mental wellbeing.</p> <p>The policy has <u>uncertain impacts</u> on the objective for housing delivery, as although the sites will be protected as a green space through the LGS designation, some of the sites have been identified as having potential for housing.</p>																		

DM39 - Development on the Seafront	
Options	<p>1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)</p> <p><b>2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated</b></p> <p>3) Develop further guidance on development within the seafront through a masterplan/ SPD</p>
Summary	<p>Option 2 is considered to be the preferred approach as through site allocations, has potential for more significant positive impacts than option 1 across certain site-based objectives, as site allocations may provide the opportunity to address site specific issues, e.g. biodiversity and heritage considerations. This will depend on the location of the sites. Site allocations may also have greater benefits for economic development, as could provide certainty for developers</p>

	and may help to bring forward development. They may also provide the opportunity to make the best use of land, through requirements relating to the mix of uses and densities.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	0	-	0	0	0	++	0	++	0	0	+	0	+	+	0	+	+
Summary	<p>The policy has potential to have <u>significant positive impacts</u> for the objectives for reducing flood risk and increasing climate change resilience. The policy should lead to improvements in coastal defences where needed, should help to prevent against flood risk through directing most seafront development away from area at highest risk of flooding, and should also result in development that is safe and prepared for the possible consequences of climate change, for example severe storms and flooding.</p> <p>The policy has potential to have <u>positive impacts</u> on the objectives for biodiversity, open space, access, health, equalities, best use of land and economic development. The policy should support the protection of coastal and marine biodiversity and should help to safeguard the open spaces of the beach and seafront. The policy should help to improve access to the beach for all people, including those with protected characteristics and will potentially facilitate physical activity. The policy may help to regenerate certain areas of the seafront and should also contribute towards supporting tourism-based economic activity.</p> <p>The policy could have <u>adverse impacts</u> on heritage assets, due to the range of heritage designations that are located along the seafront.</p>																		

<b>DM40 - Protection of Environment and Health – Pollution and Nuisance</b>	
Options	<p><i>(nb 3 sets of options covering different topics were originally assessed)</i></p> <p><i>Air quality:</i></p> <p><b>A1)Detailed policy on transport/travel and air quality and noise issues</b></p> <p>A2)No additional policy – rely on Policy CP9 of the City Plan Part One</p> <p>Light pollution:</p> <p>B1) No specific policy. Rely on NPPF (paras 109-125) and high level policies CP16 Open Space and CP8 Sustainable Buildings in CPP1 and more detail in an SPD</p> <p>B2) Have a single policy in CPP2 just covering lighting and floodlighting</p> <p>B3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief</p> <p><b>B4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail</b></p> <p>Pollution and nuisance:</p> <p>C1) No specific policy. Rely on NPPF (paras 109-125) and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 and provide detail in SPD</p> <p>C2) Have a single policy in CPP2 just covering pollution and nuisance control</p> <p>C3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief</p> <p><b>C4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail</b></p>
Summary	<p>Option A1 has greater potential for more significant positive impact on the key objectives associated with this policy area: air and noise quality, and health.</p> <p>Options B3 and B4 have potential for a positive impact across a greater range of objectives than options B1 and B2. However this is due to B3 and B4 covering a wider range of topics and therefore makes it difficult to compare. Although there is some merit in combining issues into one policy, there is concern that the issues may not be covered as adequately or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.</p> <p>Both options C2 and C4 had potential for significant positive impacts against key objectives for</p>

	this subject matter. There is some merit in combining issues into one policy, however there is concern that the issues may not be covered as adequately or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Appraisal	+	0	+	0	0	+	+	0	0	0	+	0	0	0	0	+	+	0	0
Summary	<p>The policy should have <u>positive impacts</u> on the following objectives: biodiversity, SDNP, air quality, water quality, soil quality, health and safety. The policy should ensure that new development does not give rise to any form of pollution such as air, noise, and light pollution, that will cause harm to various receptors, including people and the various aspects of the natural environment, such as biodiversity, water and land, nor to designations such as the SDNP Dark Skies Reserve. Where development may cause pollution or nuisance, evidence must be submitted to show that pollution will be minimised, measures to improve problems will be incorporated and that cumulative impacts have been considered.</p> <p>In particular, the policy has specific requirements relating to air pollution from various sources which should have <u>positive impacts</u>, including those that are not transport related, which should help meet Air Quality Action Plan targets and lead to improvements in air quality, as well as light pollution which should ensure that a safe level of lighting is provided whilst minimising impacts on the environment.</p>																		

<b>DM41 - Polluted Sites, Hazardous substances and Land Stability</b>	
Options	<p><i>(nb 3 sets of options covering different topics were originally assessed)</i></p> <p>Polluted Land:</p> <p>A1) No specific policy. Rely on NPPF (paras 109-125) and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 and provide detail in SPD</p> <p>A2) Have a single policy in CPP2 just covering pollution and nuisance control</p> <p>A3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief</p> <p><b>A4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail</b></p> <p>Hazardous Substances:</p> <p>B1) No specific policy. Rely on NPPF (paras 109-125 esp. 120, 121, 122 &amp; 123)</p> <p>B2) Have a single policy in CPP2 just covering hazardous substances and high pressure pipelines</p> <p>B3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters, including hazardous substances and high pressure pipelines in overview/brief</p> <p><b>B4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including hazardous substances and high pressure pipelines in detail</b></p> <p>Land Stability:</p> <p>C1) No specific policy. Rely on NPPF (paras 109-125), CPP1 SA1 The Seafront, and provide detail in SPD</p> <p>C2) Have a single policy in CPP2 just covering land stability</p> <p>C3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in overview/brief</p> <p><b>C4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in detail</b></p>
Summary	<p>Both options A2 and A4 had potential for significant positive impacts against key objectives for this subject matter. There is some merit in combining issues into one policy, however there is concern that the issues may not be covered as adequately or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.</p> <p>Options B2 and B 4 have the most potential for significant positive impact. Option 4 becomes</p>

	<p>more uncertain as the length of a policy could affect its usability and ultimately could affect how well the issue is addressed.</p> <p>Options C3 and C4 have potential for a positive impact across a greater range of objectives than options C1 and C2. However this is due to C3 and C4 covering a wider range of topics and therefore makes it difficult to compare. Both C2 and C4 had potential for significant positive impact against the key objective for this topic.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	0	0	0	0	0	+	0	0	0	++	0	++	+	0	+	0	0	0
Summary	<p>The policy should have <u>significant positive impacts</u> on the objective relating to making the best use of land available. The policy supports the remediation of contaminated sites and buildings. This will help bring land back into active uses and make the best use of previously developed land and sites in the city.</p> <p>The policy should have <u>positive impacts</u> for the environmental objectives relating to improving water quality and improving soil quality. The policy supports the remediation of contaminated land and buildings, which will directly improve soils and also requires that any future leaching is prevented, helping to protect groundwater quality.</p> <p>The policy should have <u>positive impacts</u> on the biodiversity objective. The policy should ensure that any proposals for hazardous substances are suitably located to avoid sensitive environments, and should also result in remediation of contaminated land which could have benefits to biodiversity through improved ground conditions.</p> <p>The policy should have <u>positive impacts</u> on the health objective. The policy should lead to improved environmental quality, having benefits for health, and should ensure that proposals for hazardous developments take measures which limit any potential for adverse health impact.</p> <p>The policy could also have <u>indirect positive impacts</u> on the housing and economic development objectives. Remediation of contaminated land and buildings will help to increase the availability of sites in the city, which could be used to increase housing or employment land supply.</p>																		

<b>DM42 - Protecting the Water Environment</b>																			
Options	<p>1) No detailed development management policy instead rely on NPPF and CPP1 (Policy CP7 Infrastructure and Developer Contributions and CP8 Sustainable Buildings) and DA policies.</p> <p><b>2) Detailed development management policy that combines the policy issues of protection of water resources and water/ waste water infrastructure.</b></p>																		
Summary	<p>Both options resulted in fairly similar results, with both likely to have significant positive impacts on the key objective for this policy area: water quality. Option 2 may have potential to have a positive impact on the SDNP through the protection of important source protection zones located there and may have greater potential for more significant positive impact on the water quality objective as the policy would enable greater consideration of local circumstances affecting water quality.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	0	0	0	0	0	++	+	0	+	0	0	0	0	0	+	0	0	0
Summary	<p>The policy should have <u>significant positive effects</u> on the water quality objective, with all policy requirements contributing towards protecting and improving water quality.</p> <p>The policy should have <u>positive effects</u> for the biodiversity objective through the requirement for development to protect and improve water quality, including seawater quality benefiting marine ecology; and for flood risk and climate change adaptation, through the requirements which should help to reduce the risk of sewer flooding, such as ensuring sufficient, or improving, sewerage capacity.</p> <p>The policy should also have a <u>positive impact</u> on health, through the protection and</p>																		

	improvement of water resources that supply drinking water.
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<b>DM43 - Sustainable Urban Drainage</b>																			
Options	<p>1) No detailed development management policy framework to guide urban drainage solutions for new development instead rely on NPPF and City Plan Part One policies (CP7 Infrastructure and Developer Contributions, CP8 Sustainable Buildings; CP11 Managing Flood Risk).</p> <p><b>2) Detailed development management policy to guide urban drainage solutions for new development to be supported by technical guidance provided in a Sustainable Urban Drainage SPD.</b></p>																		
Summary	Both options resulted in fairly similar results across key objectives for this topic area, with both likely to have significant positive impacts on the objectives for water quality and flood risk. However, option 2 may have greater potential for more significant positive impact than option 1 for these objectives, as it provides the opportunity to add information on local circumstances which could result in more effective water management. Option 2 also resulted in more significant positive impacts than option 1 on some other environmental objectives.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	+	+	0	0	++	++	0	++	+	0	+	0	0	+	0	+	0
Summary	<p>The policy should have <u>significant positive impacts</u> for objectives relating to water quality, flood risk and climate change adaptation. The policy should help to manage surface water on site, should reduce the risk of surface water flooding on site as well as elsewhere, and should also prevent the risk of future groundwater flooding events in new developments. The policy should result in SUDS that are suitable to the site, which would also help to protect quality of groundwater, and should also support climate change adaptation through reducing the risk of flooding and through increasing green infrastructure.</p> <p>The policy should have <u>positive impacts</u> on objectives relating to: biodiversity, as could result in SUDS measures comprising biodiversity features or habitats; open space as could result in improved open spaces provided in developments; SDNP as could result in sensitively designed SUDS which could enhance landscape; heritage assets/townscape as could help new development integrate into the existing built environment and ensure that townscape is enhanced through SUDS; soil quality, through filtering of surface water that may contain contaminants; best use of land through provision of SUDS which have multi-functional benefits; and health and equalities as could reduce the risk of health impacts associated with flooding/risk of flooding, including for more vulnerable groups.</p>																		

<b>DM44 - Energy Efficiency and Renewables</b>																			
Options	<p>1) No Energy Efficiency and Renewables policy within development management policy framework to guide application of energy policy for development. Instead rely on NPPF and City Plan Part One policies (CP8 Sustainable Buildings).</p> <p><b>2) Development management policy on Energy Efficiency and Renewables to guide application of energy policy for development.</b></p>																		
Summary	Option 2 had greater potential for more significant positive impact on the key objective for this policy area, climate change mitigation, as this option would ensure that all types and scales of development, and not just new build or development over a certain size, have to achieve a certain reduction in CO2 emissions, and may also encourage installation of renewables in certain locations. This option would also have more significant implications for addressing fuel poverty and health inequalities through greater delivery of homes with a higher energy efficiency.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-?	0	-?	-?	0	-	0	0	++	0	0	0	0	0	0	++	0	+	0



Summary	<p>The policy should have potential for <u>significant positive impacts</u> for the objective for reducing greenhouse gas emissions. The policy would ensure that all types and scale of development, and not just new build, would have to meet certain standards in terms of CO2 emissions and should lead to greater reductions in CO2 emissions from the energy consumption. The policy also actively encourages incorporation of renewables in certain areas.</p> <p>The policy was also found to have potential for <u>significant positive impacts</u> for objectives for health, through the health benefits that energy efficient homes have and the potential to reduce the risk of fuel poverty and health inequalities</p> <p>The policy was found to have potential for <u>positive impacts</u> for the objective for deprivation, through the potential for the policy to address fuel poverty, which affects people on lower incomes who may also have protected characteristics, and address health inequalities.</p> <p>The policy was found to have potential for <u>adverse uncertain impacts</u> on the objective for noise quality, due to the potential for certain types of renewables technologies to generate noise which can affect occupier amenity. There could also be potential adverse effects on the objectives for biodiversity, as some types of renewables can impact upon ecology, and also the SDNP and the historic built environment as the policy encourages renewables infrastructure within urban fringe locations, which are all within the setting of the SDNP, and within Development Areas, some of which have heritage constraints, however is uncertain as would depend on the type of technology and location.</p>
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DM45 - Community Energy																			
Options	<p>1) No community energy policy within development management policy framework to guide application of energy policy for development instead rely on NPPF and City Plan Part One policies (CP8 Sustainable Building</p> <p><b>2) Development management policy on Community Energy to guide application of energy policy for development.</b></p>																		
Summary	<p>Both options resulted in fairly similar results, with both likely to have significant positive impacts on the key objective for this policy area: reduction in greenhouse gases. Option 2 may have greater potential for more significant positive impact on this objective, as a policy on this topic area could help to bring forward applications for this type of development.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-?	0	-?	-?	0	-?	0	0	++	0	0	0	+	0	0	-/+?	0	+	+
Summary	<p>The policy has potential for <u>significant positive impacts</u> for the objectives relating to reducing greenhouse gas emissions as should result in renewable energy infrastructure on new developments.</p> <p>The policy has potential for <u>positive impacts</u> for making the best use of land, increasing equality and economic development, as will make good use of land available e.g. through siting solar PV arrays on rooftops, may help to reduce health-based deprivation through schemes delivered by community energy partners and may support new and emerging local low-carbon businesses.</p> <p>The policy has potential for <u>mixed (positive/adverse)</u> for the health objective. Certain types of renewable energy infrastructure could have adverse health or amenity impacts, e.g. noise nuisance or air quality impacts. However, schemes delivered through community energy partners can help to improve fuel security and reduce fuel poverty which would have positive health effects.</p> <p>The policy has potential for <u>adverse impacts</u> for the objectives relating to biodiversity, landscape, heritage and air/noise quality. Installation of renewable energy technology could have adverse impacts on certain species, could have visual impacts and could produce emissions or noise nuisance, depending on the location, scale and type of technology delivered. Solar PV, which is the predominant form of community energy installation locally is</p>																		

	not considered to have any adverse impacts on these objectives.
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<b>DM46 - Heating and cooling network infrastructure</b>																			
Options	<p>1) No policy framework to manage standards for Communal and District Heating in the City Plan (CPP1/NPPF)</p> <p><b>2) Criteria based policy to manage standards in Communal and District Heating in the City Plan</b></p> <p>3) Develop supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (SPD only)</p> <p>4) Develop policies in the city plan and supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (CPP2 + SPD)</p>																		
Summary	<p>The key objectives for this policy area is objective 9, to reduce the emissions of greenhouse gases, and objective 16, to improve health. The impacts arising from option 2 for both these objectives were either more significantly positive than other options, or had less potential for adverse or uncertain impacts than other options. Option 2 should provide policy which provides clarity to developers, potentially helping to bring forward CHP, will also ensure that certain standards of quality are achieved and will ensure that customers are protected from high heat prices, helping to reduce the risk of fuel poverty.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	+	0	-?	0	0	++	0	0	+	0	0	0	+	0	0	0
Summary	<p>The policy has potential to have <u>significant positive impacts</u> for the objectives relating to reducing greenhouse gas emissions as the policy promotes and should help support delivery of quality CHP systems, as well as ensuring delivery and future connectivity of heat networks, all of which will help to reduce carbon emissions.</p> <p>The policy also has potential for <u>positive impacts</u> for heritage, minimising waste and health. Heat networks could indirectly help protect the historic built environment as they offer an in-obtrusive way of incorporating low/zero carbon technology into the historic built environment. CHP makes use of waste heat as a resource. In addition, the policy requirements should also protect customers from fluctuations in price, therefore potentially benefiting health through reducing risk of fuel poverty and making heating more affordable.</p> <p>The policy has potential to have <u>adverse uncertain impacts</u> on the objective relating to air quality. Some forms of CHP can have localised air quality impacts, although it is recognised that some do not, e.g. heat pump technology. The level of the effect will depend on the type of fuel/system used and whether the development is located within or near to an area with existing air quality issues.</p>																		

#### 5.4 Special Areas policies

<b>SA7 - Benfield Valley</b>	
Options	<p>Option 1) No detailed policy framework and site allocations to guide new and appropriate development on the city's Urban Fringe sites (rely on market to bring forward)</p> <p>Option 2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations</p> <p><b>Option 3) Bespoke criteria-based policies for each urban fringe site allocated</b></p>
Summary	<p>Both options 2 and 3 have merits as both will provide the opportunity to include greater consideration of certain issues, particularly where there is background evidence to support this, for example biodiversity, landscape, heritage and archaeology. Also, both provide the opportunity to include some more generic criteria with regards to some issues, e.g. transport and making the best use of land. Although option 3 may result in more significant positive</p>

	<p>effects, the level of detail provided in a site specific policy may not be required for all sites, for instance, smaller site with less housing potential, or those with less on-site considerations/constraints and may result in unnecessary repetition. It is recommended that both options 2 and 3 could be pursued, with less complex sites being included in a generic urban fringe policy, and that any sites which are more complex could have their own stand-alone policy.</p> <p>(Nb: option 3 applies to this policy)</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	--	+	-	--	0	0	0	-	0	+	+	++	+	+	+	+	+
					/+					/+									
Summary	<p>The policy was found to have potential for <u>significant positive effects</u> for housing as should lead to provision of a significant amount of housing, including affordable housing and may also deliver some family type-housing.</p> <p>The policy was found to have potential for <u>positive effects</u> for biodiversity and open space. Whilst the policy supports housing delivery on two parts of the site, the policy was found to have overall benefits these objectives, as it seeks to secure funding to protect and enhance the remainder of the site for nature conservation and open space purposes. It is also noted that the areas for development have been assessed as having lower ecological value than other parts of the site which should help to minimise ecological losses.<sup>10</sup></p> <p>The policy was also found to have <u>potential for positive effects</u> for heritage, waste, best use of land, access, health, community safety, equalities and economic development. The policy should lead to the repair and restoration of the Benfield Barn listed building, also helping to preserve resources and reduce waste, and should result in development that is sensitive to the settings of the historic built environment. The delivery of 100 homes would help to make good use of the two sites for development, and would also help to improve the surrounding site through securing ongoing maintenance and management, improving the open space offer. The policy should lead to improved public access to and through the site, including for pedestrians and cyclists, also having health benefits in combination with the delivery of housing which is a wider determinant of health. Delivery of housing will also increase active uses in the area, which could help contribute towards community safety as would bringing back into use the derelict Benfield Barn. Delivery of housing, particularly affordable housing can help reduce housing-based deprivation and also contributes towards economic growth.</p> <p>The policy was found to have potential for <u>significant adverse</u> for landscape in the short term, although impacts should improve over time, as the areas of the site suitable for housing have been assessed as having potential for significant landscape effect<sup>11</sup> based on a lower amount than proposed in the policy and therefore a higher amount could have a greater significant landscape effect particularly in the short term whilst any screening mitigation is ineffective. Impacts become less significantly adverse in the longer term as mitigation becomes more effective. There could also be positive impacts in the long term due to support for delivery of a SDNP interpretation facility as well as improvements to access to the site which could help improve access to and understanding of the National Park.</p> <p>The policy was found to have potential for <u>significant adverse impacts</u> for air and noise quality. The site suffers from road noise, which could impact upon occupier amenity and which could worsen through any increase in transport movements. Although outside the AQMA, delivery of 100 dwellings on the site could result in an increase in vehicle movements that has a significant effect on air quality.</p> <p>The policy was found to have <u>mixed impacts</u> for transport and climate change adaptation. Residential development on the site is likely to increase vehicle movements around the site,</p>																		

<sup>10</sup> Urban Fringe Assessment 2015

<sup>11</sup> Urban Fringe Assessment 2015

	<p>and it is recognised that some services are located more than preferred maximum walking distance from the site which could influence travel choice. However the policy should result in improved access, including for pedestrians and cyclists. Residential development will result in loss of open space which provides natural functions, including contributing to climate change adaptation. Loss may therefore inhibit climate change adaptation although it is recognised that a significant proportion of the site will remain in a natural form.</p> <p>The policy was also found to have <u>no impacts</u> on water quality, soil quality and flood risk, as the site is not within a GSPZ, is unlikely to be contaminated, and the two areas allocated for development do not have any risk of flooding.</p>
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## 5.5 Strategic Site Allocations

SSA1 - Brighton General Hospital site																			
Options	<p>1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)</p> <p>2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites</p> <p><b>3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site</b></p>																		
Summary	<p>Option 3 has the greatest potential for significant positive impact against the widest range of objectives. Although the results for options 2 and 3 were fairly similar and had positive effects across the same sustainability objectives, overall option 3 had more potential for significant positive impact against these objectives when compared with option 2, including making the best use of land, providing housing, access, health and economic development. In particular, the key benefits of option 3 over other options is that it provides the opportunity to address any site specific considerations as well as set out more specific land use requirements and should therefore result in a better balance of uses where needed across the city. There was more uncertainty with option 1, particularly for the site-based objectives due to the uncertainty with regards to where development may come forward, and more potential for adverse impacts against some objectives including for economic development as this option may result in an imbalance of uses, and less likely to meet citywide development needs.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	+	0	+	-	-	0	+	0	+	0	+	+	++	+	++	+	+	+
					/+	/+													
Summary	<p>The policy was found to have potential for <u>significant positive effects</u> for the housing and health objectives. The policy should lead to provision of a significant amount of housing, including affordable housing. The policy should help to deliver some of the wider determinants of health, should improve access to modernised health facilities, may encourage active travel and should provide opportunities for physical activity and community interaction, all supporting health.</p> <p>The policy was found to have potential for <u>positive effects</u> for the open space, heritage, flood risk, climate change adaptation, waste, best use of land, access to services, community safety, equalities and employment objectives. The policy should lead to protection and improvement of existing on site open space and improve access to children’s play-space within the area; should lead to the preservation and enhancement of on-site heritage assets; should retain open space which can help manage flood risk as should SUDS; should lead to protection of areas of green infrastructure that support climate change adaptation; should help to conserve resources and reduce waste through conversions; and should deliver a wide range and amount of uses and make better use of the site. The policy should deliver improved/modernised health and care facilities as well as new community facilities, may provide opportunities for community interaction and opportunities for passive surveillance, as</p>																		

	<p>well as improve safety for pedestrians and cyclists accessing the site. The policy should deliver a proportion of affordable housing and should secure training for locally education/employment deprived communities., supporting equalities. The policy should enable provision of jobs in various sectors on site.</p> <p>The policy was found to have potential for <u>mixed (adverse and positive) effects</u> for the transport and air quality objectives. The policy should lead to improvements in sustainable transport which may influence travel choice. However, the amount and types of development proposed is likely to result in an increase in vehicle movements in the area, compared with existing amounts, and this may also impact upon air quality.</p> <p>The policy currently has <u>no impacts</u> on some objectives including biodiversity, SDNP, water quality, energy consumption and soil quality due to lack of site constraints relating to these objectives.</p>
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SSA2 - Combined Engineering Depot, New England Road																			
Options	See generic options for Strategic Allocations as described under Brighton General Hospital above.																		
Summary	See summary of Strategic Allocations options as described under Brighton General Hospital above.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	+	0	+	-	-	0	0	0	+	0	0	+	++	+	+	+	+	++
					/+	/+													
Summary	<p>The policy was found to have potential for <u>significant positive effects</u> for the housing and employment objectives. The policy should lead to provision of new housing, including affordable housing. The policy should contribute towards increasing supply of employment space through provision of new B1 employment floorspace that can better meet modern employment needs, including some start-up units. The policy should also support local people to gain training and skills, thus improving local employability.</p> <p>The policy was found to have <u>positive effects</u> for the biodiversity, open space, heritage, climate change adaptation, best use of land, access, health, community safety and equalities objectives. The policy should result in enhanced green infrastructure and biodiversity, including the Brighton Station Greenway impacting positively on biodiversity, open space and also climate change adaptation. The policy should result in development of an appropriate scale that respects nearby heritage assets. The policy should lead to delivery of increased amounts of development on the site, helping to make better use of land available. The policy should lead to improved pedestrian and cyclist access to the site, helping to improve access to the wider area and also potentially benefiting health, as does the delivery of housing and employment opportunities which are wider determinants of health, and should help to minimise any railway noise impacts which could adversely affect health. Delivery of mixed uses can help increase opportunities for passive surveillance, and the policy requirements for improvements along New England Road, including measures such as lighting, contribute towards community safety. Delivery of affordable housing and training opportunities could help reduce deprivation.</p> <p>The policy was found to have <u>mixed adverse/positive impacts</u> for the objectives for transport and air/noise quality. It is recognised that the policy should result in measures such as improved sustainable transport infrastructure, safe pedestrian and cyclist access and improvements to the adjacent pedestrian environment leading to the site, all of which could influence travel choice. However the amounts of development could result in an increase in transport movements in this location, which already suffers from congestion. The policy requires development to address any noise/vibration issues from the adjacent rail-track which should ensure future occupants' amenity is protected having positive impacts on the air/noise quality objective, however the amount of development may lead to an increase in vehicle</p>																		

	movements which could significantly impact upon air quality within the AQMA.
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SSA3 - Land at Lyon Close, Hove																			
Options	See generic options for Strategic Allocations as described under Brighton General Hospital above.																		
Summary	See summary of Strategic Allocations options as described under Brighton General Hospital above.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	+	0	+	-	-	0	-	0	+	0	0	+	++	++	++	+	+	+
					/+	/+													
Summary	<p>The policy was found to have potential for <u>significant positive effects</u> for the housing, health and access objectives. The policy should lead to provision of new housing, including affordable housing. The policy should result in an increase in some services/facilities, including health and community facilities, and improve pedestrian/cyclist access to the site. The policy should lead to delivery of housing and employment opportunities, which are wider determinants of health, should increase pedestrian and cyclist access to the site which could help facilitate active travel and should increase access to health provision.</p> <p>The policy was found to have potential for <u>positive impacts</u> for the open space, heritage (streetscape), climate change adaptation, community safety, best use of land, equalities and economic development objectives. The policy should result in delivery of amenity space, increasing provision of this type of open space. A more coherent redevelopment across the site should lead to improvements to townscape and streetscape. Planting of street-trees could help support climate change adaptation. Delivery of a mixed use scheme, as well as shared amenity space and community facilities could help increase passive surveillance, provide opportunities for community interaction and support community safety. The policy should result in a higher density development than currently exists on site and should exceed housing density targets, helping to maximise land use efficiency. Delivery of affordable housing and training opportunities could help reduce deprivation. The policy should contribute towards increasing supply of new employment floorspace more able to meet modern employment needs, and although it is recognised that there will be a net loss of employment floorspace on site, this should be mitigated by the potential to increase job density across the site.</p> <p>The policy was found to have <u>mixed adverse and positive impacts</u> for the objectives for transport and air/noise quality. The amounts of development could result in an increase in transport movements in this location, although it is recognised that the policy requires improvements to sustainable transport infrastructure, including pedestrian and cyclist access to the site, which could influence travel choice. The site is situated outside the AQMA however could result in an increase in vehicle movements which has a detrimental effect on local air quality. The site is situated adjacent to the railways lines, which produce a significant level of noise and could impact upon occupier amenity.</p> <p>The policy could have <u>adverse impacts</u> on flooding, as the site has risk of surface water and groundwater flooding.</p>																		

SSA4 - Sackville Trading Estate and Coal Yard, Hove	
Options	See generic options for Strategic Allocations as described under Brighton General Hospital above.
Summary	See summary of Strategic Allocations options as described under Brighton General Hospital

	above.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	+	0	0	-	-	+	-	0	0	+?	0	++	++	++	+	+	+	++
Summary	<p>The policy was found to have potential for <u>significant positive effects</u> for the housing, employment, best use of land and access objectives. The policy should lead to provision of new housing, including affordable housing. The policy should help to regenerate a partially vacant site and should significantly exceed density targets. The policy should result in an increase in some services/facilities and improve pedestrian access to the site. The policy should contribute towards increasing supply of employment space through provision of new B1 employment floorspace that should be able to meet modern employment needs and should help to increase skills and employment opportunities for local people.</p> <p>The policy was found to have potential for <u>positive impacts</u> for the open space, water quality, soil quality, health, community safety and equalities objectives. The policy should result in delivery of children’s playspace, increasing provision of this type of open space, as well as a public square and other mixed uses all of which could help increase passive surveillance, provide opportunities for community interaction and support community safety. The site is within Groundwater Source Protection Zones 1 and 2 includes a reference to protection of groundwater. The policy has potential to support remediation of a contaminated site and improve soil quality although this is fairly uncertain and will depend on site investigation. The policy should lead to delivery of housing and employment opportunities, which are wider determinants of health, should increase pedestrian access to the site which could help facilitate active travel and should help to minimise any railway noise impacts which could adversely affect health. Delivery of affordable housing could help reduce deprivation as could training opportunities.</p> <p>The policy was found to have <u>mixed adverse/positive impacts</u> for the objectives for transport and air/noise quality. It is recognised that the policy should result in measures such as improved pedestrian access which could influence travel choice. Following SA recommendation the policy also refers to improvements to other forms of sustainable transport. However despite policy measures, the amounts of development could result in an increase in transport movements in this location, which already suffers from congestion. The policy requires development to address any noise/vibration issues from the adjacent rail-track which should ensure future occupants’ amenity is protected having positive impacts on the air/noise quality objective. The policy does not include any reference to air quality and the amount of development may lead to an increase in daily vehicle movements which could significantly impact upon air quality within the AQMA.</p> <p>The policy could have adverse impacts on flood risk as small parts of the site have surface water flood risk, and the site could be at risk of groundwater emergence.</p>																		

<b>SSA5 - Madeira Terraces and Drive</b>	
Options	<p>1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)</p> <p><b>2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated</b></p> <p>3) Develop further guidance on development within the seafront through a masterplan/ SPD</p>
Summary	Option 2 is considered to be the preferred approach as through site allocations, has potential for more significant positive impacts than option 1 across certain site-based objectives, as site allocations may provide the opportunity to address site specific issues, e.g. biodiversity and heritage considerations. This will depend on the location of the sites. Site allocations may also

	have greater benefits for economic development, as could provide certainty for developers and may help to bring forward development. They may also provide the opportunity to make the best use of land, through requirements relating to the mix of uses and densities.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Appraisal	+	+	0	++	+	+	0	0	0	0	0	+	+	0	++	+	+	+	++
Summary	<p>The policy was found to have <u>significant positive effects</u> for the heritage, access and economic development objectives. The policy supports development that should lead to the repair and restoration of Madeira Terraces, a grade II listed structure which is currently degraded, and should help to bring the arches within it back into active uses. Any improvements to the terraces should also impact positively on the Conservation Areas within which the site is located. The policy should help to improve access to this part of the seafront, both through improvements to structures such as the lifts and esplanade, but also through improvements to sustainable transport, pedestrian facilities and public realm. The policy also supports delivery of a wide range of uses, which would increase provision of certain services in this location. The policy supports redevelopment of this eastern section of the seafront, through various uses such as retail, leisure and cultural, which should help to ensure the seafront continues to be a year-round destination for tourism, recreation and leisure use, having economic benefits.</p> <p>The policy was found to have <u>positive impacts</u> across all other relevant objectives including biodiversity, access to open space, transport, air/noise quality, waste, best use of land, health, community safety and equalities. The policy should lead to conservation and enhancement of biodiversity, including locally designated sites; should help to increase and improve access to this part of the seafront, which performs an important function in terms of open space; should provide improved sustainable transport and promotes active travel to and through the site, which can influence travel choice, also having benefits for health; should ensure that future noise issues do not arise through the clustering of potentially noisy uses together and away from residential development; promotes the repair and restoration of existing buildings, helping to make the best use of resources in the city; should result in improved public realm including lighting and delivery of a wide mix of uses could help provide footfall and passive surveillance at different times, supporting community safety; should lead to improved access to the beach for people with certain protected characteristics including disabled people and older people.</p> <p>The policy was found to have <u>no impacts</u> on certain objectives/issues which are of relevance to this site, such as climate change adaptation and flood risk. This is because the policy does not include any specific references to these issues as they are addressed through other existing or emerging policy.</p>																		

<b>SSA6 - Former Peter Pan Leisure Site (adjacent Yellow Wave), Madeira Drive</b>																			
Options	See options as described under SSA5 Madeira Terraces above.																		
Summary	See summary above.																		
Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Appraisal	+	+	0	+	+	+	0	0	0	0	0	0	+	0	+	+	+	0	+
Summary	<p>The policy was found to have <u>positive impacts</u> across all relevant objectives including biodiversity, open space, heritage, transport, noise quality, making the best use of land, access to services, health, community safety, and economic development. The policy requires biodiversity to be conserved and enhanced; should help to increase and improve access to this part of the seafront, which performs an important function in terms of open space and also will not result in any loss of the actual beach; the policy should result in improved sustainable transport and promotes active travel to and through the site, which can influence travel choice, also having benefits for health; the policy should ensure that future noise issues do not arise through the clustering of potentially noisy uses together and away from residential</p>																		



	development; the policy should help bring a derelict piece of land back into use; the policy should increase and improve access to the area, as well as result in an increase in provision in this location, also having community safety benefits through increasing footfall; and should help to ensure the seafront continues to be a year-round destination with a wide offer, having economic benefits.
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<b>SSA7 - Land Adjacent to American Express Community Stadium, Village Way</b>																			
Options	See generic options for Strategic Allocations as described under Brighton General Hospital above.																		
Summary	See summary of Strategic Allocations options as described under Brighton General Hospital above.																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+	0	+	+	+	+	+	-	0	+	0	0	+	0	+	+	0	+	++
Summary	<p>The policy was found to have potential for <u>significant positive impacts</u> for the economic development objective as the policy may help to increase employment land supply in the city and thus contributes towards meeting development needs of employment sectors. The policy may also help to increase land supply for education and health purpose, which are also both significant employers in the city.</p> <p>The policy was found to have potential for <u>positive impacts</u> for the objectives for biodiversity and climate change adaptation as although development on the site could result in loss of a landscaped bund, policy requirements relating to provision of green infrastructure and achieving biodiversity action plan objectives should mitigate any adverse impacts.</p> <p>The policy was found to have potential for <u>positive impacts</u> for the objectives for the SDNP and heritage, as the policy requires for development to enhance the surrounding landscape and heritage assets.</p> <p>The policy was also found to have potential for <u>positive impacts</u> for the objectives for sustainable transport and air quality, as although new development can increase journeys to a location, the site has good existing access to sustainable transport and the policy requires sustainable transport infrastructure improvements to be provided; and requires development to address noise issues.</p> <p>The policy was found to have potential for <u>positive impacts</u> for water quality, making the best use of land, access to services, health and equalities. The policy requires groundwater sources to be protected; could help bring forward development on an un-used piece of land and make good use of the site; could help to increase access to meaningful employment which is a wider determinant of health as well as increase provision of health facilities; access to training could reduce employment-deprivation through increasing skills, although would be dependent on take-up by deprived communities.</p> <p>The policy could have <u>adverse impacts</u> on the flood risk objective. The site has a low to medium risk of flooding across the majority of the site and development in this location could increase flood risk.</p>																		

## 5.6 Housing Sites

### H1 Housing & Mixed Use Sites

This assessment is based on an amalgamation of the of the individual sites assessments undertaken for each site allocated for housing and mixed use, as well any policy requirements within H1. Individual site assessments can be found in the Appendix F.

H1 - Housing and Mixed Use Sites																			
Options	<p>1) Do not allocate any sites for housing. Rely on market to bring forward suitable sites.</p> <p>2) Allocate all sites in SHLAA that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.</p> <p><b>3) Allocate sites in the SHLAA capable of delivering 10+ units, that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.</b></p>																		
Summary	<p>Overall, Option 3 had more potential for positive impacts across a greater range of sustainability appraisal objectives, and less potential for adverse impacts than the two other options, including potential for positive impact for biodiversity, landscape, housing, best use of land, access, health and economic development.</p> <p>Although Option 2 had greater potential for more significant positive impacts for housing delivery when compared with options 1 and 3, the flexibility of Option 3 for smaller sites could result in greater citywide benefits, e.g. for making the best use of land, for economic development, and for access to services, as this would allow other uses to come forward in response to market conditions, whilst still allowing residential uses to come forward. Overall, Option 2 was found to be too prescriptive and lacked flexibility, particularly for smaller sites. Option 1 was found to be very flexible, however lacked certainty for developers and may inhibit overall housing delivery, and when Option 3 is compared with Option 1, the certainty of allocating larger SHLAA sites was considered to be more positive for housing delivery.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	+/0	0	0	- /+/0	+	- /+	0	- /+	- /+	+	0/+	-	+	++	+	+	+	+	-/+/0
Summary	<p>The policy was found to have potential for <u>significant positive impacts</u> for the housing objective as allocates 45 sites that could deliver over 1,600 dwellings, including sites which will deliver 100% affordable rented accommodation, and larger sites that should deliver 40% affordable housing.</p> <p>The delivery of homes, particular affordable homes has <u>positive impacts</u> for the equalities and social inclusion objective, through helping to reduce housing inequalities. The policy also allocates some sites which are likely to deliver housing for certain people with protected characteristics, including young people and people requiring emergency temporary accommodation.</p> <p>The policy was found to have <u>positive impacts</u> for making the best use of land through maximising land-use efficiency with higher-density schemes and through the redevelopment of vacant/derelict sites. This also has positive impacts for community safety as can help reduce the fear of crime, in addition the policy will increase opportunities for passive surveillance and community activity through mixed use schemes, which also supports community safety.</p> <p>On balance, the policy was found to have <u>positive impacts</u> for reducing the need to travel and access, as most of the sites allocated had good access to public transport and were considered to be within walking distance from some essential services such as schools, shops and health facilities which can influence travel choice.</p> <p>On balance, the policy was found to have <u>positive impacts</u> for health, due to proximity to services and the delivery of housing and opportunities for employment both of which are wider determinants of health. However it is recognised that some sites have either air and/or noise issues which could impact upon occupier amenity and health if not considered at the design stage.</p> <p>On balance, the policy was also found to have <u>positive impacts</u> for supporting climate change adaptation, as most of the sites are previously developed sites and would not involve a loss of green infrastructure.</p> <p>The policy was found to have <u>mixed impacts</u> (neutral/adverse/positive impacts) for the economic development objective. Almost half the sites have a neutral effect as will neither result in a loss or gain in employment floorspace; some of the sites will result in a net gain in</p>																		

employment floorspace or improve the quality of employment floorspace having a positive effect; however some of the sites will result in a net loss in employment floorspace having adverse effects.

On balance, the policy was found to have mixed impacts (neutral/positive impact) for the biodiversity objective reflecting the fact that most of the sites are previously developed sites with limited potential for ecological interest and none of the sites have a nature conservation designation therefore having a neutral effects; development of these sites could result in net gain in biodiversity. It is recognised that some of the sites could have ecological interest due to their more natural form, or have TPOs in place.

The policy was found to have mixed impacts (neutral impact/positive impact) for the soil quality objective reflecting the fact that more than half the sites are unlikely to be contaminated, therefore having no impact on the objective, whereas some have potential for contamination based on current or former uses, which would require remediation in order to provide housing having a positive effect.

The policy was found to have mixed impacts (positive/adverse/neutral) for heritage/archaeology, as some sites have heritage/archaeological constraints and could result in adverse impacts, some do not and would have neutral impacts, and some of the approved schemes have been assessed as having positive impacts for heritage, e.g. through converting and bringing back into use a heritage asset.

The policy was found to have mixed impacts (positive/negative) for flood risk, as over half the sites have a risk of surface water flooding, and some sites have a risk of groundwater flooding. 19 sites (42%) have no flood risk.

The policy was found to have mixed impacts (positive/negative) for the air quality and noise quality objective, as some of the sites are within the AQMA and could worsen air quality and some of sites suffer from high levels of road/rail noise, which would require mitigation. However some sites do not have air or noise quality issues and are unlikely to worsen air or noise quality having a positive effect.

The policy was found to have mixed impacts (positive/negative) for reducing greenhouse gas emissions. The potential impact was based on whether sites were located within a heat cluster opportunity area. 29 were located within a cluster area and therefore have greater potential to reduce greenhouse gas emissions when compared with those that are not.

The policy was found to have an overall adverse effects for the waste objective as more than half the sites will result in completion demolition and redevelopment, will therefore result in production of construction and demolition waste, and will not provide the opportunity to conserve resources.

The policy was found to have neutral impacts for the open space objective, reflecting the fact that the majority of sites had no open space designation and would therefore not result in any losses in open space having no impact, with only small losses in designated open space taking place in total.

The policy was found to have neutral impacts for SDNP, as although a few of the sites could be within the setting of the SDNP, the majority are within the central built up areas or situated within an existing urban context, having a neutral effect.

The policy was found to have neutral impacts for water quality, as although some of the sites are within a groundwater source protection zone, the majority are not, having an overall neutral effect.

## H2 – Urban Fringe Housing Sites

This assessment is based on an amalgamation of the of the individual sites assessments undertaken for each site allocated for housing, as well any policy requirements within H2. Individual site assessments can be found in the Appendix F.

**H2 - Urban Fringe Housing Sites**

Options	<p>In addition to the options discussed under H1, the following options were also considered:</p> <ol style="list-style-type: none"> <li>1) No detailed policy framework and site allocations to guide new and appropriate development on the city’s Urban Fringe sites (rely on market to bring forward)</li> <li>2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations</li> <li>3) Bespoke criteria-based policies for each urban fringe site allocated</li> </ol>																		
Summary	<p>In summary both Options 2 and 3 were found to have merit as both would provide the opportunity to include specific consideration of particular issues, e.g. biodiversity, landscape, heritage and archaeology. Although Option 3 could result in more significant positive effects, the level of detail provided in a site specific policy may not be required for all sites, for instance, smaller sites with less housing potential, or those with less on-site considerations/constraints and may result in unnecessary repetition. It was recommended that both Options 2 and 3 could be pursued, with all sites being included in a generic urban fringe allocation policy with specific site considerations clearly identified for each.</p> <p>These recommendations have been taken forward via Policy H2. The site at Benfield Valley is specifically addressed by Policy SA7 due to its cross-cutting policy and delivery issues.</p> <p>Sites with capacity for fewer than 10 units were discounted from consideration for allocation in line with the overall approach to site allocations following the SA options for housing sites outcome.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-/+	- /+	-/0	- /0	-	- /+	- /0	- /0	+	-	-/+ /0	-/0	+	++	-/+	-/+	+	+	0
Summary	<p>The policy was found to have potential for <u>significant positive impacts</u> for housing as should result in more than 850 dwellings, including a proportion of affordable housing and family (3+ bedroomed) dwellings.</p> <p>The policy was found to have potential for <u>positive impacts</u> for the objectives for reducing greenhouse gas emissions, through the requirement for development to consider incorporating renewable energy technologies; making the best use of land as will help to deliver housing and make good use of the sites whilst retaining greenfield functions across non-developed parts of the sites; community safety, through the potential to increase activity and passive surveillance; and equalities, through the delivery of affordable housing, and also through the potential to address the risks of fuel poverty.</p> <p>The policy was found to have potential for <u>adverse impacts</u> for transport/travel, as some of the sites had poor access to public transport and other services and their location on the fringes of the city may influence car ownership and travel choice. The policy is considered to have potential for adverse impacts for climate change adaptation as development will result in partial loss of sites that provide natural functions, such as temperature regulation and water absorption, which will become increasingly important with climate changes.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/adverse) for access and health, as some sites have poor access to services and facilities, although some have good access; some sites suffer from high road noise, whereas others do not; some sites may worsen local air quality, whereas others are unlikely to; and development will result in delivery of housing which is a wider determinant of health however may result in loss of space to carry out physical activity having different health impacts.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/adverse) for biodiversity, as some sites contain nature conservation designations and ecological interest and could result in losses, whereas others do not and offer potential for nature conservation enhancement.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/adverse) for open space, as some sites contain publically accessible open space and would result in a net loss, whereas others are privately owned and may result in a net gain in accessible open space through the policy</p>																		

	<p>requirements to secure additional or improvements to open space.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/neutral) for SDNP, as all sites are within the setting of the SDNP and have landscape sensitivities, becoming more neutral in the longer term as mitigation measures become more effective.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/neutral) for heritage/archaeology, as some sites have heritage/archaeological constraints and could result in adverse impacts, whereas some do not and would have neutral impacts.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/positive) for air/noise quality, as although none of the sites are within the AQMA reducing the risk of a worsening of air quality where it is particularly poor, some of the sites delivering more than 100 dwellings could worsen localised air quality; and some of sites suffer from high levels of road noise which could impact upon occupier amenity, although some do not.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/neutral) for water quality, as some of the sites are within a groundwater source protection zone and could impact upon water quality, whereas some are not, having a neutral effect.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/neutral) for flood risk, as some of the sites have a risk of flooding, whereas some do not, having a neutral effect.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse, neutral, positive) for soil quality, as some of sites are classified as grade 3 agricultural land and would result in loss of this resource, most are considered to have low potential for contaminated land having neutral impacts, and some are considered to have potential for contamination and would provide the opportunity to improve soil quality.</p> <p>The policy was found to have <u>neutral impacts</u> for economic development, as will not result in any gains of employment land and the potential impacts of loss of some businesses are considered to be outweighed by the economic benefits of housebuilding.</p>
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<b>H3 - Purpose Built Student Accommodation Sites</b>																			
Options	1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA 2) Criteria based policy with no preferred sites identified 3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.																		
Summary	<p>Overall Option 3 had the most potential for positive impacts across the greatest range of sustainability objectives, in particular for housing as it provides greater certainty where PBSA would be supported which may help to bring forward development and reduce reliance on the HMO market, and also for access to services and making the best use of land as could help to ensure the competing development needs of the city are met.</p> <p>All options were found to have potential for adverse impacts against some of the environmental site-based objectives although Options 2 and 3 would provide the opportunity to address any site specific considerations. Option 2 was considered to offer greater flexibility and the ability to respond to changing markets when compared with Option 3. However this approach lacked certainty for developers with the risk that suitable sites may not come forward resulting in continued reliance on the HMO market to meet students' housing needs.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	0	0	0	-	+	+	-	-	+	0	0	0	+	++	+	-	0	0	0
																/+			
Summary	<p>The policy was found to have potential for <u>significant positive effects</u> for the housing objective. The policy should lead to delivery of student accommodation, directly helping to meet their housing needs, and may also have positive effects on the local housing market, as could reduce the need to provide student accommodation in HMOs, thus potentially freeing up family-type housing or reducing the amount of housing that is changed to this use.</p> <p>The policy was found to have potential for <u>positive effects</u> for the objectives for travel,</p>																		

	<p>air/noise quality, greenhouse gas emissions, best use of land, and access. The location of the sites along sustainable transport corridors should help to minimise the need to travel by car, also having air quality benefits, and it is anticipated that any increase in daily vehicle flow would be lower than the amount above which air quality can be significantly affected, due to other policy requirements that prevent car ownership. The type of development could provide opportunities to maximise energy efficient heating, such as communal heating, helping to minimise any increases in greenhouse gas emissions, particular for the site within a heat network cluster area. The developments could help to make the best use of land, through minimising the need for additional land-take, or through redeveloping redundant land. The sites help to facilitate good access to various services and public transport due to their locations.</p> <p>The policy was found to have potential for <u>mixed impacts</u> on the health objective. The delivery of PBSA on both sites could help to promote active travel and the accommodation provided should be a good quality in accordance with other policy requirements, benefiting health, however it is recognised that the sites suffer from high levels of road noise which could impact upon occupier amenity, as well as being a producer of noise issues and both are within the AQMA.</p> <p>The policy was found to have potential for <u>adverse impacts</u> on the water quality and flood risk objectives. One of the sites is within a Groundwater Source Protection Zone 1 and therefore development poses a risk to water quality. Both sites have a risk of surface water flooding and development could be at risk or increase the risk of flooding elsewhere.</p>
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## 5.7 Other Site Allocations

<b>E1 Opportunity site for new business and warehouse uses</b>																			
Options	<p>1) Do not allocate new sites for employment uses. Allow market to decide.</p> <p>2) Allocate new sites for employment uses</p> <p>3) Bring forward employment allocations as part of Strategic Mixed Use sites</p>																		
Summary	<p>Although option 2 has potential for positive impacts for the economic development objective, which is the main objective relating to this policy area, option 3 is considered to have potential for more significant positive impact for this objective as could result in employment development coming forward more readily through mixed use schemes which contain an element of housing, helping to increase employment land supply. This could have wider benefits, such as reducing the risk of long-term vacancy of sites, helping to make the best use of land available, which also indirectly helps to reduce the fear of crime or opportunities for crime. Option 3 will also have positive impacts for housing, through housing delivery on mixed use sites, and helps to deliver the housing and employment determinants of health. Positive impacts on the site based objectives will largely be gained through avoiding more sensitive sites, and this option would need to ensure compatibility between uses in mixed use schemes in order to avoid potential for amenity impacts.</p>																		
Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	-	-	-	0	-	-	0	-	0	-	0	+	+	0	0	+	0	+	++
Summary	<p>The policy was found to have potential for <u>significant positive impacts</u> for the economic development objective as the policy may help to increase employment land supply in the city and thus contributes towards meeting development needs of various employment sectors. The policy was found to have potential for <u>positive impacts</u> for the objectives for waste, making the best use of land, health, and equalities. The policy clearly refers to the need to ensure development does not prejudice any future waste development; the policy could help bring forward development on an un-used piece of land and make better use of the site; the policy could help to increase access to meaningful employment which is a wider determinant</p>																		

<p>of health; employment-based development could help to reduce employment-deprivation through increasing access to opportunities, although would be dependent on take-up by deprived communities.</p> <p>The policy was found to have potential for <u>adverse impacts</u> for the objectives for biodiversity, open space, SDNP, travel, flood risk and climate change adaptation. The site comprises open space which could have potential for biodiversity and open space would be lost to development. The site is adjacent to the SDNP and could have landscape sensitivities. The site is likely to be accessed by car due to its location and does not have particularly safe access to public transport currently. The site could be at risk of groundwater emergence. Development of the site is likely to result in loss of green infrastructure, which would otherwise contribute to adapting to climate change through absorption of water and temperature regulation.</p> <p>The policy was found to have <u>mixed impacts</u> for the air/noise quality objective. The site is outside the AQMA, however without knowing the amounts of development to be delivered it is difficult to gauge whether there would be a significant increase in vehicle movements and whether this would adversely affect air quality. The site suffers from high levels of road noise, however this may make it more suitable for some employment uses, which could be noisy and therefore less compatible with other uses, for example housing.</p>
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## Section 6 Site Appraisals of Site Allocations

### 6.1 Introduction

This section summarises the methodology relating to identification and appraisals of sites.

### 6.2 Methodology - Housing and mixed use sites in the built-up-area (H1)

A long list of sites was initially developed through a range of evidence, including the SHLAA, call for sites carried out at scoping stage 2016, planning applications, commercial property database and information from other council departments.

Some sites were then excluded from the long list, as they were already allocated in City Plan Part 1, or sites had a planning permission which had already commenced and therefore were not considered for allocation any further.

Additional sites were then excluded from the long list following the sustainability appraisal of options (see section 5) which recommended that sites providing less than 10 units should not be allocated. Sites not capable of being delivered in the plan period were also excluded and sites considered inappropriate for housing allocation were also excluded, including sites with potential for other uses, such as those for employment of student housing.

Further sites were then excluded following conclusions of the Housing and Employment Land Study 2017 (HELA) based on new evidence of predicted long-term use.

Following this stage, site appraisals were carried out using the Sites Sustainability Appraisal Framework (see section 3) on the sites identified in table 6.1. The purpose of these site appraisals was to assess the likely effects of the type of development identified for each site, and summarised where development was unlikely to have any issues on SA objectives, where development could have adverse effects on SA objectives, and where development could have positive effects on SA objectives. To assist this process, the SA made use of the information presented in the site profiles<sup>12</sup> which identified constraints and opportunities, as well as other publically available GIS data.

The SA site appraisals were not used as part of the process to discount or reject sites, e.g. if they were found to be less sustainable when compared with other sites, as all sites at this stage were considered to have potential for allocation. This reflects the high level of development needs in the city, the constrained nature of the city, and the lack of available sites which leads to the need to allocate all suitable sites.

**Table 6.1 Proposed sites (H1)**

Site name and address
Former St Aubyn's School, 76 High Street, Rottingdean, Brighton, BN2 7JN
Land between Marina Drive and rear of 2-18 The Cliff, Brighton
25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton
46-54 Old London Road, Patcham BN1 8XQ
60-62 & 65 Gladstone Place, Brighton
76-79 & 80 Buckingham Road, Brighton, BN1 3RJ
87 Preston Road, Brighton, BN1 4QG
251-253 Preston Road, Brighton, BN1 6SE
Eastergate Road Garages, Moulsecoomb, Brighton, BN2 4PB
Land between Manchester Street/Charles Street, Brighton, BN2 1TF

<sup>12</sup> Site Profiles are located within the Site Allocations Topic Paper



Baptist Tabernacle, Montpelier Place, Brighton, BN1 3BF
Preston Park Hotel, 216 Preston Road, Brighton, BN1 6UU
George Cooper House, 20-22 Oxford Street, Brighton
Old Ship Hotel (garage), 31-38 Kings Road Brighton
Saunders Glassworks, Sussex Place, Brighton, BN2 9QN
Selsfield Drive Housing Office, Selsfield Drive, Brighton, BN2 4HA
Tyre Co, 2-16 Coombe Road, Brighton, BN2 4EA
Whitehawk Clinic, Whitehawk Road, Brighton
Buckley Close garages, Hangleton, BN3 8EU
Former playground, Swanborough Drive, Whitehawk
Former Hollingbury Library, Carden Avenue
29-31 New Church Road, Hove, BN3 4AD
189 Kingsway, Hove, BN3 4GU
Kings House, Grand Avenue, Hove, BN3 2LS
Land at and surrounding Downsman Pub, Hangleton Way, Hove, BN3 8ES
Victoria Road Former Housing Office (adjacent Portslade Town Hall), Victoria Road, Portslade
Land at the corner of Fox Way and Foredown Road, Mile Oak
Smokey Industrial Estate, Corner of Church Road, Lincoln Road & Gladstone Road, Portslade
Land south of Lincoln Street Cottages, 15-26 Lincoln Street, Brighton BN2 9UJ
Belgrave Centre and ICES, Clarendon Place, Portslade BN41 1DJ (Site SP2 in JAAP)
Wellington House, Portslade (Site SP3 in JAAP Policy CA3)
Kings School Site, Portslade
Land rear of 62-68 Beaconsfield Road, Brighton
Land west of Homeleigh, Patcham
City College, Pelham Tower (and car-park), Pelham Street, BN1 4FA
71 - 76 Church Street, Brighton
The Astoria, 10-14 Gloucester Place, Brighton, BN1 4AA
Post Office site, 62 North Road, Brighton
Former Brewery site, South Street, Portslade BN41 2LX
27-31 Church Street (corner with Portland Street), Brighton
Former Dairy Crest Site, 35-39 The Droveway, Hove, BN3 6LF
270 Old Shoreham Road, Hove
Kingsway/Basin Road North (Site AB4 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA2)
Prestwich House, Portslade (Site SP1 in JAAP Policy CA3)
Regency House, Portslade (Site SP4 in JAAP Policy CA3)
Former Flexer Sacks, Portslade (Site SP5 in JAAP Policy CA3)
Church Road/Wellington Road/ St Peter's Road (Site SP6 in JAAP Policy CA3)
Station Road, Portsalde (Site SP7 in JAAP Policy CA3)

Site assessments for these sites can be found in Appendix F

A further stage of review and refinement of sites took place following the SA site appraisals based on information including the likelihood of sites coming forward within the plan period. This led to some sites being excluded as shown in table 6.2. Site assessments for these sites can also be found in Appendix F.

**Table 6.2 Rejected sites following further review**

Site name
Kings School Site, Portslade
Land rear of 62-68 Beaconsfield Road, Brighton
Land west of Homeleigh, Patcham

The individual site assessments for all H1 sites allocated formed the basis of the assessment for policy H1.

### 6.3 Methodology - Housing sites in the urban fringe (H2)

Site allocations in the urban fringe have been largely informed by two assessments. The Urban Fringe Assessment (2014) identified potential for residential development across a number of sites where it was considered significant effects could be overcome and recommended areas for potential development. The Urban Fringe Assessments (2015) further refined this study by carrying out more detailed landscape, ecology and archaeology assessments on certain sites. Following these studies, 33 sites within 19 clusters were considered to have potential for housing development. In addition, development on the urban fringe was tested as part of the Spatial Strategy during preparation of City Plan Part 1.

3 sites were then excluded from this list following the sustainability appraisal of options (see section 5) which recommended that sites providing less than 10 units should not be allocated.

As above with H1, following this stage, site appraisals were carried out using the Sites Sustainability Appraisal Framework on the sites identified in table 6.3 in order to identify issues and opportunities, however was not used as a way of discounting sites.

**Table 6.3 Proposed urban fringe site**  
(nb – site clusters identified)

Site number	Site name
1	Land at Oakdene, Southwick Hill / Land West of Mile Oak Road
2	
4	Land at Mile Oak Road, Portslade.
4a	
4b	
5	
5a	
6	
11	Benfield Valley
12	
16	Land at and adjoining Horsdean Recreation Ground, Patcham
17	Land at Ladies Mile, Carden Avenue
21	Land to northeast of Coldean Lane/Land north of Varley Halls/Land south of Varley Halls
21a	
21c	
30	Land at and adjoining Brighton Race Course
31	Land east of Whitehawk Hill Road
32	Land at South Downs Riding School and Reservoir Site
32a	
36	Land south of Warren Road, (Lawns Memorial Park)
37	Roedean Miniature Golf Course
38	Land at Ovingdean Hall Farm & Land at Bulstrode / Ovingdean Farm
38a	
39	
42	Land adjacent to Ovingdean and Falmer Road, Ovingdean
46a	Land at Former Nursery, Saltdean
48	Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue North, Saltdean
48a	

Site number	Site name
48b	
48c	
50	Land west of Falmer Avenue, Saltdean

Site assessments for these sites can be found in Appendix F

Further consideration to site allocations including whether sites would be available for development within the plan period, availability of the site, potential impacts upon adjoining uses and representations submitted during the scoping consultation were then considered. This led to 2 sites being excluded as shown in table 6.4. Site assessments for these sites can also be found in Appendix F

Table 6.4 Rejected urban fringe sites following further review

Site number	Site name
31	Land east of Whitehawk Hill Road
37	Roedean Miniature Golf Course

The individual site assessments for all H2 sites allocated formed the basis of the assessment for policy H2 as well as policy SA7 – Benfield Valley.

#### 6.4 Methodology – Purpose Built Student Accommodation (H3)

A number of locations/sites were put forward for new PBSA as part of the CPP2 ‘call for sites’ exercise conducted in 2016, however only one of these was considered to have potential for PBSA. An additional site came forward after the call for sites, which was also considered to have potential for PBSA.

The SA of options for student housing recommended that a policy should identify sites as allocations.

A site assessment was carried out for both sites against the SA Framework, to identify constraints and opportunities, and was used to form the basis of policy H3.

Table 6.5 Proposed PBSA

Site name and address
Lewes Road Bus Garage, Lewes Road
118-132 London Road (currently Boots / Co-op)

Site assessments for these sites can be found in Appendix F

#### 6.5 Methodology – Strategic Site Allocations (SSA1-SSA7)

Strategic sites were identified through the 2016 call for sites, through recent planning applications and through officer knowledge of forthcoming development potential.

The SA of options for mixed use strategic allocations recommended that there should be a detailed policy for each proposed strategic site allocation; the SA of options for seafront development recommended that there should be a detailed development management policy with remaining sites allocated.

A site assessment was carried out for all seven sites against the SA Framework to identify constraints and opportunities and was used to form the basis of policies SSA1 to SSA7.

**Table 6.6 Proposed Strategic Site Allocations**

<b>Site name and address</b>
Brighton General Hospital site, Elm Grove, Brighton (Policy SSA1)
Combined Engineering Depo, New England Road, Brighton (Policy SSA2)
Land at Lyon Close, Davigdor Road, Hove (Policy SSA3)
Sackville Trading Estate and Coal Yard, Hove (Policy SSA4)
Madeira Terraces and Drive, Brighton (SSA5)
Former Peter Pan Leisure site, Madeira Drive (SSA6)
Land adjacent to American Express Community Stadium, Village Way (SSA7)

Site assessments for these sites can be found in Appendix F.

### **6.6 Methodology – Opportunity area for new business and warehouse uses (E1)**

Only one site was identified as having potential for new business and warehouse uses.

The SA of options for employment site allocations found that to bring forward employment allocations as part of strategic mixed use sites would be the preferred option, however despite this the one site was proposed to be allocated as shown in table 6.7.

A site assessment was carried out for this site against the SA Framework to identify constraints and opportunities and was used to form the basis of policy E1.

**Table 6.7 Proposed employment/warehouse allocation**

<b>Site name and address</b>
Land at Hangleton Bottom, Hangleton Link Road, Hove

The site assessment for this site can be found in Appendix F

Further and more detailed information on the site allocation process can be found in the site allocations topic paper.

## Section 7 Mitigation

### 7.1 Introduction

This section summarises the various mitigation that would be required in order to reduce the likelihood or significance of adverse effects arising from CPP2. This includes cross references to various CPP1 and emerging CPP2 policies where these are considered to provide mitigation.

### 7.2 Mitigation

The requirement for mitigation is discussed in detail within individual policy assessments within Appendix G. Table 7.1 summarises the mitigation for the Plan as a whole.

**Table 7.1 Potential impact and mitigation required**

SA Objectives	Impact	Mitigation
Biodiversity	Development could increase recreational pressure on nearby sites of nature conservation importance.	<ul style="list-style-type: none"> <li>• CPP1 CP10 provides for protection of biodiversity.</li> <li>• CPP2 DM37 seeks to protect and prevent damage to designated sites.</li> <li>• CPP2 DM37 should ensure that development retains ecosystem services and contribute to the wider green network.</li> <li>• CPP1 DM37 requires development to protect protected species, habitats and trees</li> </ul>
	Development within the seafront could impact on nearby sites of nature conservation importance.	
	Hotel development within certain Development Areas could impact upon nearby sites of nature conservation importance.	
	Maximising development on site to make the most efficient use of land could result in greater ecological losses on site.	
	Certain types of renewable energy technologies can have adverse impacts on ecology.	
	Development on some urban fringe sites could have adverse ecological impacts.	
Open Space	Development on some sites could result in loss of open space	<ul style="list-style-type: none"> <li>• CPP1 CP16 requires some open space is retained on site if losses occur.</li> <li>• CP16 also requires development to provide and improve open space.</li> </ul>
SDNP	PBSA within university campuses could have landscape impacts.	<ul style="list-style-type: none"> <li>• CPP1 SA5 should ensure that development within the setting of the SDNP contributes towards protecting the special qualities of the landscape.</li> <li>• CPP1 CP15 and DM18 should ensure design is of a high quality.</li> <li>• CPP2 DM37 should ensure that</li> </ul>
	New employment floorspace, particularly within existing industrial estates could have landscape impacts.	
	Maximising development on	

SA Objectives	Impact	Mitigation
	<p>site to make the most efficient use of land could result in landscape impacts.</p> <p>Certain types of renewable energy technologies can have adverse impacts on landscape.</p> <p>Development on some urban fringe sites could have adverse landscape impacts.</p>	<p>development retains ecosystem services and contribute to the wider green network.</p> <ul style="list-style-type: none"> <li>• CPP2 SA7 and H2 require LVIA to inform development.</li> </ul>
Heritage	<p>Possible impacts on listed buildings through conversion of C3 house into HMO.</p> <p>Possible impacts on Conservation Areas through market development within retail areas and through development on the seafront, and through housing development on some sites.</p> <p>Hotel development within Development Areas could impact upon adjacent heritage designations.</p> <p>Maximising development on site to make the most efficient use of land could result in landscape impacts.</p> <p>Certain types of renewable energy technologies can have adverse impacts on heritage.</p> <p>Development in some locations could have adverse impacts on archaeology.</p>	<ul style="list-style-type: none"> <li>• CPP2 DM27 should ensure that change of use does not harm special interest of the building.</li> <li>• CPP2 DM26, DM27, DM28 and DM29 should ensure that development preserves or enhances the character of the various heritage asset or its setting.</li> <li>• CPP1 CP12 and CP13 should also ensure development conserves the city's built heritage.</li> <li>• CPP2 DM31 should ensure that archaeological interest is not harmed.</li> </ul>
Travel by car / transport	<p>New employment floorspace could increase transport movements.</p> <p>Development within the seafront could increase attractiveness of the area and add to existing congestion issues.</p> <p>Park &amp; Ride schemes may lead to displacement rather than reduction in car movements</p> <p>New housing development could increase transport movements, particularly sites which do not have good access to services.</p>	<ul style="list-style-type: none"> <li>• CPP1 Spatial Strategy directs the majority of development to areas within the city which benefit from existing sustainable transport provision.</li> <li>• CPP1 CP9 Sustainable Transport sets the strategy relating to promoting sustainable travel.</li> <li>• CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised.</li> <li>• CPP2 DM35 requires larger developments to submit a transport assessment which also considers cumulative impacts from other developments and required development to help minimise the use of private car.</li> </ul>

SA Objectives	Impact	Mitigation
		<ul style="list-style-type: none"> <li>• CPP2 DM34 requires consideration of impacts on traffic flows and city centre parking provision.</li> <li>• Strategic site allocation policies all require sustainable transport infrastructure improvements.</li> </ul>
Air/noise quality	New employment floorspace could increase transport movements and impact upon air quality.	<ul style="list-style-type: none"> <li>• CPP1 Spatial Strategy directs the majority of development to areas within the city which benefit from existing sustainable transport provision.</li> <li>• CPP1 CP9 Sustainable Transport sets the strategy relating to promoting sustainable travel.</li> <li>• CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised.</li> <li>• CPP2 DM40 should ensure that any noise impacts arising from development are acceptable.</li> <li>• CPP2 DM35 requires larger developments or those within the AMQA to submit a transport assessment which also considers cumulative impacts from other developments and requires development to help minimise the use of private car.</li> <li>• CPP1 CP8 requires development to address air quality.</li> </ul>
	Development within the seafront could increase attractiveness of the area and result in increased traffic and congestions and associated problems.	
	Certain types of renewable energy technologies can have adverse impacts on noise quality.	
	New housing development could increase transport movements having air quality impacts, particularly larger sites or sites within the AQMA.	
Water Quality	Conversion of C3 house into HMO could result in increases in resource consumption compared to individual dwellings	<ul style="list-style-type: none"> <li>• CPP1 CP8 should ensure high standards of water efficiency are achieved.</li> <li>• CPP1 CP8 requires development to safeguard groundwater within sensitive GSPZs.</li> <li>• CPP2 DM42 should ensure that water quality is protected.</li> <li>• Some SSA policies include requirements to protect water quality.</li> </ul>
	Development within GSPZ could have adverse impacts upon water quality	
Flood Risk	Development could be at risk of surface water flooding in certain areas, due to risk of flooding in the area or could increase the risk elsewhere.	<ul style="list-style-type: none"> <li>• CPP1 CP11 requires development to consider previous flooding events and incorporate appropriate mitigation.</li> <li>• CPP2 DM43 requires development to incorporate SUDS and ensure that water run-off is not increased elsewhere.</li> <li>• CPP2 H2 requires development to consider various flood risks.</li> </ul>
	Transport interchanges could result in urbanisation of land and increase risk of surface water flooding/run-off.	
Greenhouse Gas emissions	Conversion of C3 house into HMO could result in increases in resource consumption compared to individual	<ul style="list-style-type: none"> <li>• CPP2 DM44 requires conversions and changes of use to achieve certain energy efficiency standards</li> <li>• CPP1 CP8 requires certain standards of</li> </ul>

SA Objectives	Impact	Mitigation
	dwelling	energy efficiency to be achieved.
Climate Change adaptation	Transport interchanges could result in urbanisation of land and increase risk of surface water flooding/run-off.	<ul style="list-style-type: none"> <li>• CPP2 DM43 requires development to incorporate SUDS and ensure that water run-off is not increased elsewhere.</li> <li>• CPP2 DM37 should ensure that development retains ecosystem services and contribute to the wider green network.</li> <li>• H2 requires green infrastructure to be provided on urban fringe sites.</li> <li>• CPP1 CP8 requires development to address climate change adaptation</li> </ul>
	Development on sites of a natural form could result in an increase in urbanised land, reduction in green infrastructure and increase flood risk.	
Soil Quality	Employment uses could result in an increase in contaminated land.	<ul style="list-style-type: none"> <li>• CPP1 CP8 expects development to reduce land pollution.</li> <li>• CPP2 policies on polluted sites and protection of the environment should minimise this risk.</li> </ul>
Waste	Conversion of C3 house into HMO could result in increases in resource consumption and waste compared to individual dwellings.	<ul style="list-style-type: none"> <li>• CPP1 CP8 requires development to minimise waste and facilitate recycling.</li> <li>• WMLP policies should ensure that construction and demolition waste is minimised and disposed of in accordance with the waste hierarchy.</li> </ul>
	Redevelopment on certain sites will involve demolition and production waste.	
Best use of land	Local Centre policy could result in temporary vacancies in order to prove change of use required.	<ul style="list-style-type: none"> <li>• Vacancies would be of a temporary nature and is not considered to require mitigation.</li> <li>• CPP1 DA policies indicate locations where higher density development would be acceptable; CP12 Urban Design sets out the 9 areas with potential for taller developments; CP14 Housing Density provides policy guidance on expected densities.</li> </ul>
	Protection of amenity could prevent certain types of development from being acceptable including higher density schemes.	
Access	Housing development on some of the urban fringe sites does not have good access to certain services.	<ul style="list-style-type: none"> <li>• H2 requires development to consider the need for community facilities.</li> </ul>
Health	Maximising development on site to make the most efficient use of land could result in increased amenity impacts.	<ul style="list-style-type: none"> <li>• CPP2 DM20 should ensure that impacts on amenity is acceptable.</li> <li>• CPP2 DM40 should ensure developments are designed to alleviate any existing problems.</li> <li>• CPP1 CP16 requires some open space is retained on site if losses occur.</li> </ul>
	New development within areas of high road/rail noise could result in occupier amenity impacts.	



SA Objectives	Impact	Mitigation
	Some urban fringe sites may result in loss of open space which could impact upon physical and mental health and well-being.	<ul style="list-style-type: none"> <li>• CP16 also requires development to provide and improve open space.</li> <li>• H2 may result in improved access to the SDNP which could be used for recreation purposes.</li> </ul>
Community safety	Local Centre policy could result in temporary vacancies which may increase fear of crime.	<ul style="list-style-type: none"> <li>• Vacancies would be of a temporary nature and is not considered to require mitigation.</li> </ul>
Economic Development	Housing development on some sites could result in loss of employment floorspace	<ul style="list-style-type: none"> <li>• CPP2 SSA policies allocate new land for employment uses.</li> <li>• E1 allocates land for employment uses.</li> <li>• DM11 requires new employment floorspace to be flexible.</li> </ul>

## Section 8 Cumulative and Significant Effects

### 8.1 Introduction

The SEA Directive requires an assessment of additional impacts in addition to direct impacts arising from individual policies. These are specified as “secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative”.

The policy appraisals incorporated some consideration of effects over different time-scales, as well as whether effects would be permanent or temporary, positive or negative, and direct or indirect (secondary). These can therefore be found in Appendix G. This section therefore concentrates on cumulative and synergistic effects.

### 8.2 Cumulative Effects and Synergistic Effects

The following situations could give rise to cumulative effects:

- Two or more different sources having the same insignificant effect, which then combines to have a more significant cumulative effect (e.g. two different developments both increasing local transport movements having a combined greater transport effect)
- Different effects acting together on a receptor (e.g. development on open space, which leads to an increased local population and loss of open space resulting in greater pressure on existing open space)

Synergistic effects are a type of cumulative effect and are where the cumulative effect may be greater or smaller than the sum of the separate effects. For example, separate policies within a plan may have their own individual effects including significant effects, however the total combined effect could be less significant, e.g. where policies reduce the risk of adverse impacts.

Cumulative and synergistic effects of CPP2 are considered in this appraisal in two ways. Firstly by looking at the cumulative effects of all DM policies and the Site Allocation policies separately against the SA objectives; secondly by considering the cumulative effects of all the policies within the plan together.

Table 8.1 brings together the short term effects of the DM policies. Table 8.2 brings together the short term effects of the Site Allocations policies. Table 8.3 brings together the short term effects of all policies within CPP2. This allows an overview of the impact of the plan’s policies against the SA objectives. An overall effect for each of the sustainability appraisal objectives is indicated in the bottom row.

A discussion of the effects follows the tables and is separated into effects upon each of the sustainability objectives, or groups of related sustainability objectives for the Development Management policies, Site Allocations policies and CPP2 as a whole. This discussion also helps to highlight potential significant effects.

**Table 8.1 Table to show cumulative effect of DM policies against SA objective**

	1 biodiversity	2 open space	3 SDNP	4 Heritage	5 Travel	6 Air/noise	7 Water	8 Flooding	9 Carbon em.	10 CC Adapt	11 Soil	12 Waste	13 Land use	14 Housing	15 Access	16 health	17 Crime	18 Equalities	19 Ec. Dev.
DM1	+?	0	0	0	0	0	0	0	0	0	0	0	-	++	0	++	0	+	+
DM2	0	0	0	+	0	0	0	0	0	0	0	0	+	++	+	+	0	0	0
DM3	0	0	0	+	0	0	0	0	0	0	0	0	++	++	0	+	0	+	0
DM4	0	+	0	0	+	+	0	0	0	0	0	0	0	++	+	++	+?	++	0
DM5	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+	++	0	++	0
DM6	0	0	0	0	+	0	0	0	0	0	0	0	0	++	0	++	0	++	+
DM7	0	0	0	-/+?	+	+	-/+	0	-/+	0	0	-/+	+	+?	+	++	0	+?	?
DM8	-	-	0/-	+	++	++	0	-	0	-	0	0	+	++	+	+	+	0	+
DM9	0	0	0	+?	++	+	0	0	0	0	0	0	+	0	++	++	+?	+	+
DM10	0	0	0	+?	+	0	0	0	0	0	0	0	+	0	++	++	+	+?	+
DM11	0	0	-/+?	0	-/+	-/+	0	0	0	0	-?	+	++	0	0	+	0	+	++
DM12	0	0	0	+	+	+	0	0	0	0	0	0	-/+	0	++	+	-/+	+	++
DM13	0	0	0	+	+	+	0	0	0	0	0	0	+	0	++	+	+	+	+
DM14	0	0	0	0	+	0	0	0	0	0	0	0	+	0	++	+	+	0	++
DM15	-	+	0	+	-	-/+	0	+	0	0	0	0	+	0	+	+	+	0	++
DM16	0	0	0	-/+	+	+	0	0	0	0	0	0	?	0	++	+	?	0	++
DM17	-	0	0	-	+	+	-/0	-	0	0	?	-	+	0	0	0	+	0	++
DM18	0	+	+	++	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DM19	-/+?	+	-/+?	-/+?	0	0	0	0	0	0	0	+	++	++	+	-/+	0	0	++
DM20	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	++	+	0	0
DM21	0	0	+	+	0	0	+	0	+	0	0	0	+	+	0	+	0	0	+
DM22	++	+	+	+	0	+	+	++	0	++	0	0	+	0	0	++	0	0	0
DM23	0	0	0	++	0	0	0	0	0	0	0	0	0	0	+	0	+	+	+
DM24	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
DM25	+	0	+	++	0	0	0	0	0	0	0	0	+	0	+	0	0	0	+
DM26	+	+	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
DM27	0	0	0	++	0	0	0	0	0	0	0	+	+	+	0	0	0	0	+
DM28	+	++	0	++	0	0	0	+	0	+	0	+	+	0	0	+	0	0	0
DM29	+?	+?	+	++	0	0	0	+?	0	+?	0	0	0	0	0	+?	0	0	+
DM30	+	+	+	++	0	0	0	+	0	+	0	0	+	0	0	+	0	0	+
DM31	0	+	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
DM32	+	+	0	++	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+
DM33	0	?	?	0	++	++	0	0	+	0	0	0	0	0	+	++	++	++	+
DM34	0	0	+	+	-/+?	+?	-?	-?	+	-?	?	0	0	0	+	+	+	+	+
DM35	0	0	0	0	++	++	0	0	+	0	0	0	+	0	+	++	+	+?	+
DM36	0	0	0	0	++	++	0	0	+	0	0	0	+	0	+	+	+	+	+
DM37	++	++	+	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	0
DM38	+	++	+	+	0	0	0	+	0	+	0	0	0	?	0	+	0	0	0
DM39	+	+	0	-	0	0	0	++	0	++	0	0	+	0	+	+	0	+	+
DM40	+	0	+	0	0	+	+	0	0	0	+	0	0	0	0	+	+	0	0
DM41	+	0	0	0	0	0	+	0	0	0	++	0	++	+	0	+	0	0	0
DM42	+	0	0	0	0	0	++	+	0	+	0	0	0	0	0	+	0	0	0
DM43	+	+	+	+	0	0	++	++	0	++	+	0	+	0	0	+	0	+	0
DM44	-?	0	-?	-?	0	-	0	0	++	0	0	0	0	0	0	++	0	+	0
DM45	-?	0	-?	-?	0	-?	0	0	++	0	0	0	+	0	0	-/+?	0	+	+
DM46	0	0	0	+	0	-?	0	0	++	0	0	+	0	0	0	+	0	0	0
All	+	+	+	+	+	+	+	+	+	+	+	+/0	+	++	+	++	+	+	++

**Table 8.2 Table to show cumulative effect of Special Area and Site Allocation policies against SA objectives**

	1 biodiversity	2 open space	3 SDNP	4 Heritage	5 Travel	6 Air/noise	7 Water	8 Flooding	9 Carbon em..	10 CC Adapt	11 Soil	12 Waste	13 Land use	14 Housing	15 Access	16 health	17 Crime	18 Equalities	19 Ec. Dev.
SA7	+	+	-	+	-/+	-	0	0	0	-/+	0	+	+	++	+	+	+	+	+
SSA1	0	+	0	+	-/+	-/+	0	+	0	+	0	+	+	++	+	++	+	+	+
SSA2	+	+	0	+	-/+	-/+	0	0	0	+	0	0	+	++	+	+	+	+	++
SSA3	0	+	0	+	-/+	-/+	0	-	0	+	0	0	+	++	++	++	+	+	+
SSA4	0	+	0	0	-/+	-/+	+	-	0	0	+?	0	++	++	++	+	+	+	++
SSA5	+	+	0	++	+	+	0	0	0	0	0	+	+	0	++	+	+	+	++
SSA6	+	+	0	+	+	+	0	0	0	0	0	0	+	0	+	+	+	0	+
SSA7	+	0	+	+	+	+	+	-	0	+	0	0	+	0	+	+	0	+	++
H1	+/0	0	0	- /+/0	+	-/+	0	-/+	-/+	+	0/ +	-	+	++	+	+	+	+	- /+/ 0
H2	-/+	-/+	-/0	-/0	-	-/+	-/0	-/0	+	-	- /+ /0	-/0	+	++	-/+	-/+	+	+	0
H3	0	0	0	-	+	+	-	-	+	0	0	0	+	++	+	-/+	0	0	0
E1	-	-	-	0	-	-/+?	0	-	0	-	0	+	+	0	0	+	0	+?	++
All	-/+	+	-/+/0	-/+	-/+	-/+	-/+	-/+	+	-/+	+	-/+	++	++	++	++	+	+	++

**Table 8.3 to show cumulative effects of all policies within CPP2 against SA objectives**

	1 biodiversity	2 open space	3 SDNP	4 Heritage	5 Travel	6 Air/noise	7 Water	8 Flooding	9 Carbon em..	10 CC Adapt	11 Soil	12 Waste	13 Land use	14 Housing	15 Access	16 health	17 Crime	18 Equalities	19 Ec. Dev.
DM	+	+	+	+	+	+	+	+	+	+	+	+/0	+	++	+	++	+	+	++
S Alls	-/+	+	-/+	-/+	-/+	-/+	-/+	-/+	0/+	-/+	+	-/+	++	++	+	++	+	+	++
CPP2	+	+	+	+	+	+	+	+	+	+	+	0	++	++	+	++	+	+	++

### 8.3 Discussion of Effects

#### Biodiversity

##### DM policies

Overall, the cumulative impact of the DM policies should lead to the enhancement of local biodiversity<sup>13</sup>. DM22 and DM37 in particular should ensure appropriate consideration of existing biodiversity features and important ecological sites, and should ensure developments contribute to the green network. Policies such as DM38, DM39, DM40, DM41, DM42 and DM43 should all also have positive effects for biodiversity either directly through specific requirements, e.g. on the seafront, or indirectly e.g. through SUDS which can also have benefits for biodiversity.

##### Site allocation policies

Overall, the cumulative impact of the site allocations policies is mixed for local biodiversity. Most of the policies could have positive impacts for biodiversity, such as H1 either due to the lack of biodiversity on site and the opportunities for enhancement, or through specific policy requirements such as with SSA2, SSA5 and SSA6. However H2 could have mixed impacts for biodiversity, particularly in the short term and will depend on the ecology on-site

<sup>13</sup> "Local biodiversity" refers to biodiversity within the city. Effects of CPP2 on European sites of nature conservation importance outside the city boundary are being assessed through the Habitat's Regulations Assessment process. See Section 3 for further details.

and how any potential adverse effects are mitigated. Any adverse impacts on biodiversity should improve/reduce in the longer term.

#### CPP2 overall

Overall, the cumulative impact of CPP2 should be **positive** for local biodiversity, particularly in the longer-term. The DM and Site Allocations policy requirements should combine to ensure that ecology and biodiversity is adequately considered and protected, that any potential adverse effects are mitigated or compensated where appropriate, and should lead to net gains overall, particularly in combination with CPP1. However, at this stage it is not possible to ascertain what the cumulative effects of transport movements and air quality on biodiversity outside the local area would be, particularly on the Ashdown Forest SAC/SPA. This will be confirmed once the full Habitats Regulations Assessment, which will assess the transport and air quality impacts arising from CPP2 alone and in combination with other plans and programmes, has taken place. Therefore, at this stage the cumulative effects on the Ashdown Forest are **uncertain**.

#### Open Space

##### DM policies

Policy CPP1 CP16 is the strategic policy that seeks to ensure retention of and incorporation of open space. Overall, the cumulative effect of DM policies should result in provision of open space including specific requirements in DM4 Housing for older people, DM19 should ensure that open space provided is usable across all sites, and DM37 supports protection of open space particularly where it has an ecological designation.

##### Site allocation policies

Overall, the cumulative impact of the site allocations policies is positive for open space. Most of the strategic mixed use site allocations policies have specific requirements either relating to protection of existing, or creation of new open space. Overall H1 in general directs development to areas which do not contain open space, although it is recognised that there are some losses. Although H2 will result in some losses in open space, not all sites are publically accessible and the policy itself specifically requires new or improved accessible open space to be incorporated within schemes.

#### CPP2 overall

Overall, the cumulative impact of CPP2 should be **positive** for open space, particularly in combination with CPP1. The DM and Site Allocations policy requirements should combine and result in provision of new and usable and publically accessible areas of open space.

#### SDNP

##### DM policies

Policy CPP1 SA5 is the strategic policy that seeks protection of the special qualities of the SDNP, including its setting. Overall the cumulative effect of the DM policies should also support protection of and access to the SDNP, and should help to mitigate the risk of impacts on certain sites that are adjacent to the SDNP, such as industrial estates and PBSA or that arise through certain types of development, such as energy infrastructure. In particular, DM18 and DM21 should result in good quality design, policies DM25 and DM34 include specific references to protect the landscape through design, and DM38 seeks to protect certain areas as Local Green Space which includes areas within the setting of the SDNP or those that have a wider landscape role.

##### Site allocation policies

Overall, the cumulative impact of the site allocations policies is mixed for landscape. The majority of the strategic mixed use site allocations and H1 and H3 allocations do not have any impact upon this objective, mainly due to their location within the city, or their existing urban context. However SA7 and some of the H2 allocations could have adverse or mixed impacts due to their proximity to the SDNP and/or the wider landscape role of the sites, although it is acknowledged that H2 sets out landscape as a specific site consideration. Adverse impacts on landscape should improve/reduce in the longer term with appropriate mitigation.

#### CPP2 overall

Overall, the cumulative impact of CPP2 should be **positive** for landscape, particularly in the longer-term. The DM and Site Allocations policy requirements should combine to ensure that the surrounding landscape is protected,

including through good design, and that any potential adverse effects are mitigated through on-site considerations such as screening.

### Heritage

#### DM policies

Overall, the cumulative impact of the DM policies should be the enhancement and conservation of heritage assets, in particular DM26, DM27, DM28, DM29, DM30, DM31 and DM32 should ensure development does not harm the special historic interest of various heritage assets and seek to preserve and increase understanding of archaeology. Other policies also combine to have a positive effect on heritage including DM18 and DM21 that should result in good quality design, policies that allow change of use which could have heritage benefits through preventing neglect such as DM2, DM3, DM7, DM9, DM10 and the retail policies DM12 and DM13.

#### Site allocation policies

Overall the cumulative impact of the site allocations is mixed for heritage. The majority of the strategic mixed use site allocations have positive impacts on this objective, mainly due to specific policy requirements relating to the proximate heritage assets as well as requirements relating to improving townscape and public realm. However all of the housing site allocations policies (H1, H2 and H3) could have mixed including adverse impacts due to on-site or adjacent heritage constraints.

#### CPP2 overall

Overall, the cumulative impact of CPP2 should be **positive** for heritage assets. The DM and Site Allocations policy requirements should combine to ensure that heritage and archaeological assets are enhanced and conserved, and should result in developments that are well-designed, that contribute towards improving the streetscape and that can be integrated into the built environment.

### Reducing the need to travel, improving accessibility, and improving air quality

#### DM policies

Overall, the cumulative impact of the DM policies should encourage travel by sustainable and active means and help to reduce the need to travel by car, particularly through implementation of transport policies DM33, DM35 and DM36. Other policy requirements relating to the location of certain types of development may also help to reduce the need to travel by car, including housing for older people, supported accommodation, PBSA and hotels, as well as policies DM9, DM10, DM12, DM13, DM14, DM16 which should all ensure various community facilities and retail provision continue to be accessible and therefore also reduce the need to travel.

These policies also work together to achieve air quality benefits through reducing the need to travel, and the overarching policy DM40 should ensure that new developments do not worsen local air quality and seek to improve local air quality conditions.

#### Site allocation policies

Overall the cumulative impact of the site allocations policies is mixed for reducing the need to travel by car and improving air quality. The strategic mixed use site allocations are considered to have mixed impacts based on the amount of development proposed and the risk that this could increase congestion and worsen air quality, with some being within the AQMA, however acknowledging that these policies all require sustainable transport infrastructure to be provided. The H2 site allocations are all considered to have adverse impacts for reducing the need to travel by car, due to their location which could promote travel by car and also due to lack of access to some services. The H1 sites however were found to be largely positive due to the availability of existing sustainable transport for most sites and good existing access to most services which may reduce the need to travel by car.

All the site allocations policies, with the exception of H2, were found to have positive impacts for access, mainly based on the location of the site having good access to local services and facilities, but also through some of the strategic mixed use site allocations which have specific requirements in terms of providing services, including retail or health uses.

## CPP2 overall

Overall the cumulative impact of CPP2 should be **positive** for reducing the need to travel by car, increasing and improving accessibility and improving air quality. The DM and Site Allocations policy requirements should combine to promote sustainable transport use and seeks to reduce private car use through the delivery of infrastructure to support and encourage sustainable modes of transport, and allocates sites which predominantly have good access to most services as well as public transport provision. However the risk remains that there could be an increase in transport movements resulting from the amount of development which could **worsen** congestion and air quality.

## Improving water quality

### DM policies

Overall, the cumulative impact of the DM policies should protect the water environment, particularly through policies DM42 and DM43 and also through policy DM40 which seeks to prevent pollution to water. These policies should ensure that development which is located within sensitive groundwater protection zones, or development which would result in a significant change from a natural to a more in urbanised form do not adversely affect the quality of water resources. Strategic policy CPP1 CP8 seeks to ensure water consumption associated with new development is minimised, also supporting this objective by minimising water consumption.

### Site allocation policies

Overall, the cumulative impact of the site allocations policies is mixed for water quality. The majority of the strategic mixed use sites have no effects as they are not located within a groundwater source protection zone, and those which are include a reference to protecting sensitive water resources, thereby having positive effects. H1 was found to have an overall neutral effect as the majority of sites are not within a GSPZ; H2 has mixed effects as more than half of the site allocations are located within a GSPZ although it is acknowledged that H2 sets out aquifer impacts as a specific site consideration.

## CPP2 overall

Overall the cumulative impact of CPP2 should be **positive** for water quality. The DM and Site Allocations policy requirements should combine to ensure that sensitive groundwater protection zones are protected, through on-site considerations and that development does not lead to the pollution of these resources. Any increase in water consumption associated with new development is not addressed in CPP2 as this is addressed through strategic policy CPP1 CP8 Sustainable Buildings.

## Reducing flood risk and climate change adaptation

### DM policies

CPP1 Policy CP11 sets the strategic approach to reducing flood risk and has strong links to climate change adaptation. Overall, the cumulative impact of the DM policies should also help to reduce flood risk, particularly through policy DM43 on SUDS and helps to mitigate against possible risks associated with certain types of development in certain locations such as with DM8 and DM17, but also certain types of development that may increase the amount of urbanised form, such as DM34 Transport Interchanges. DM39 also has specific references relating coastal protection which should help reduce tidal flooding. In addition, policies which protect areas of open space, including some of the heritage policies, and those which should result in increases in green infrastructure, such as DM22 and DM37 also help to reduce flood risk and help support climate change adaptation through temperature regulation.

### Site allocation policies

Overall, the cumulative impact of the site allocations policies is mixed for reducing flood risk and largely depends on whether the sites have an on-site risk of flooding. Many have a risk of flooding particularly from surface water but also from groundwater emergence. The cumulative impact is also mixed for climate change adaptation, however this mainly relates to whether development of a site would result in losses of green infrastructure. Therefore the strategic sites allocations and H1 sites are considered to have more positive effects for this objective compared with SA7 and H2 which will result in losses in green infrastructure, although it is recognised that H2 includes flooding as an on-site consideration where relevant and the policy itself specifically requires green infrastructure to be provided.

## CPP2 overall

Overall the cumulative impact of CPP2 should be **positive** for reducing flood risk and supporting climate change adaptation. The DM and Site Allocations policy requirements should combine to ensure that the risk of flooding is assessed and that appropriate measures are taken to reduce flood risk on-site as well as elsewhere, which also supports climate change adaptation, as do policy requirements that will result in protection of or increases in green infrastructure.

### Reducing greenhouse gas emissions

#### DM policies

CPP1 Policy CP8 sets the strategic approach to minimising consumption of energy through standards for new-build developments. Overall, the cumulative impact of the DM policies build upon CP8 and should also help to minimise energy consumption and reduce greenhouse gas emissions, particularly through DM44 which will ensure that energy consumption from conversions and changes of use is minimised and exceeds building standards requirements through measures which improve energy efficiency, as well as seeks to gain higher standards of energy efficiency in certain areas of the city. In addition, DM45 and DM46 should also help to reduce greenhouse gas emissions through support for community energy and integrated heat networks. The transport policies should also help to minimise transport based carbon emissions.

#### Site allocation policies

None of the strategic mixed use site allocations policies included any additional requirements relating to energy consumption, as this is already addressed through strategic policy. The housing site allocations policies were found to be positive/mixed towards this objective, however this is largely based on some sites being located within or near to heat cluster opportunity areas.

#### CPP2 overall

Overall, the cumulative effect of CPP2 should be **positive** for minimising greenhouse gas emissions, in particular through implementation of the DM policies which build upon strategic policies contained within CPP1 and should ensure higher energy efficiency standards are achieved in conversions and changes of use. However, it is recognised that any increase in development will result in an overall net increase in carbon emissions from energy consumption.

### Improving soil quality

#### DM policies

Overall, the cumulative impact of the DM policies should lead to the improvement of soil quality through both of the remediation of contaminated land (DM41), and through policy requirements which should prevent pollution to land (DM40).

#### Site allocation policies

Overall, the cumulative impact of the site allocations policies is positive for improving soil quality, based on the assumption that some of the sites have potential for contamination and development will therefore facilitate remediation. Some of the H2 sites were found to have adverse effects for this objective. This is based on some of the sites containing land that is designated as grade 3 agricultural land, however it is noted that none of this land designated is in active agricultural uses.

#### CPP2 overall

Overall, the cumulative effect of CPP2 should be **positive** for improving soil quality as could help to remediate contaminated sites and should prevent further contamination of land.

### Minimise Waste

#### DM policies

CPP1 Policy CP8 sets the strategic approach in relation to provision of adequate facilities for waste storage and recycling within new development and the Waste & Minerals Local Plan sets the strategic approach in relation to waste reduction, e.g. associated with construction and demolition. Overall, the cumulative impact of the DM policies is minimal in relation to waste minimisation, however some policies could have positive effects, such as DM7 which could reduce waste production associated with individual dwellings through support for conversion from HMOs to



single dwellings; and through policies which support change of use which indirectly enable better use of existing resources. Some adverse impacts are associated with types of development which may result in demolition.

#### Site allocation policies

As the WMLP sets the strategic approach to waste reduction, the strategic mixed use site allocations did not include any additional requirements relating to demolition or construction waste and impacts are therefore considered to be largely neutral. Some opportunities for positive impacts arise where the policy requires restoration of certain buildings, e.g. listed building, which will therefore preserve resources and reduce waste. Impacts for H1 and H2 site allocations are found to be adverse overall, however this is based on individual site assessment which assesses the need to demolish and redevelop the site as having an adverse impact and did not take into consideration the strategic policy framework. Again, as the WMLP sets the strategic approach, impacts arising from site allocations policies are considered to be largely neutral.

#### CPP2 overall

Overall the cumulative effect of CPP2 policies for waste minimisation, in combination with the policies contained within WMLP, is considered to be **neutral**, as any waste arising from the demolition and construction phases should be minimised in accordance with adopted policy. Any resources saved, e.g. through the preservation of listed buildings associated with site allocations is considered to be minimal overall. It should also be noted that the potential for an overall net increase in waste production associated with new development has not been considered in this assessment, as this was considered within CPP1.

### Making the best use of land

#### DM policies

Overall, the cumulative impact of the DM policies should help to make good use of the land available in the city. In particular, DM19 seeks to maximise the efficient use of individual sites, DM41 should result in the remediation of contaminated sites and therefore increases land available for development for certain uses, DM11 should result in provision of employment floorspace that is flexible and be used for a variety of needs, and DM3 supports delivery of additional housing within the existing housing stock, which also helps to make better use of land resources. Many of the other DM policies were also found to have indirect positive impacts on this objective particularly policies which allowed changes of use, which could help to bring vacant premises back into use, and also through policies which supported multi-functional features e.g. landscaping, as these help making better use of building stock and land available.

#### Site allocation policies

Overall, the cumulative impact of the site allocations is positive for making the best use of land. All of the site allocations policies should lead to provision of various amounts and types of development, increasing development densities on individual sites and helping to meet citywide needs. In the majority of cases, the minimum density targets outlined within CPP CP14 should be met on all site allocations, unless there are constraints which results in a lower amount of development to ensure any potential for adverse site-based impacts is avoided.

#### CPP2 overall

Overall, the cumulative effect of CPP2 should be **significantly positive** for making the best use of land in the city. The DM and Site Allocations policy requirements should combine to ensure that each site within the city has its development potential maximised, through the various requirements for types and amounts of development on each site allocated and through various policies that should ensure a balance of uses is maintained.

### Providing housing

#### DM policies

Overall, the cumulative impact of the DM policies should have positive impacts for housing provision and should deliver a range of good quality housing that meets a variety of needs. DM1 should ensure that housing is of a good quality and standard; DM2 seeks to retain housing and helps to ensure that housing is retained as a C3 use; DM3 helps to ensure that a range of housing sizes is maintained to help meet the needs of different sized households; DM4 and DM5 supports provision of housing for people with certain housing needs, including older and vulnerable people; DM6 provides support for build to rent housing; and DM8 provides support for purpose build student accommodation which helps to meet the needs of students as well as reducing the pressure on existing housing

market. Although DM7 supports provision of new HMOs and conversion from HMO back into C3 use, there is some uncertainty with regards to how readily new HMOs will come forward with the policy due to the various policy criteria that need to be met.

#### Site allocation policies

Overall, the cumulative impact of the site allocations is positive for housing, with strategic mixed use sites including provision of housing and 54 sites within the built up area and on the urban fringe being allocated for housing development.

#### CPP2 overall

Overall, the cumulative effect of CPP2 should be **significantly positive** for housing. The allocation of sites for housing, including Purpose Built Student Housing, provides a clear and direct indication that housing will be supported on these sites and could help to bring development forward, and the DM policies should ensure that a high quality and appropriate mix and type of housing is delivered across the city.

### Improving health

#### DM policies

Overall, the cumulative impact of the DM policies should have positive impacts for improving health and well-being. The housing policies, DM1 to DM8, supports retention and delivery of a range of different type of housing to help meet various needs, with housing being one of the wider determinants of health, and should also ensure that all housing delivered is of a certain size and standard as well as contain private outdoor space. DM9 and DM10 support retention of community facilities and pubs which can help to support social interaction and supports well-being. The retail policies DM12 to DM16 help to maintain a balanced mixed of uses and support new market development, which can help communities access certain shops and services locally, including access to food. DM18 should help to facilitate sustainable access around new developments, which can support healthy lifestyles. DM20 and DM21 should help to protect amenity of existing and future residents. DM22, DM37 and DM38 all support retention and provision of green infrastructure and spaces as well as sites with ecological importance, which can provide opportunities for physical activity and helps to support and improve environmental quality, having health and well-being benefits. The transport policies DM33 to DM36 work together to facilitate active travel, should help to provide sustainable transport measures and therefore minimise travel by car and reduce the adverse effects associated with congestion and transport movements including noise and air pollution. DM40, DM41, and DM42 should help to reduce the likelihood of various types of environmental pollution as well as lead to improved environmental quality, including water quality. DM43 helps to reduce the risk of flooding, and therefore helps to protect mental well-being. The energy policies DM44 to DM46 could all help to deliver energy efficient homes and potentially reduce the risk of fuel poverty and health inequalities.

#### Site allocation policies

Overall, the cumulative impact of the site allocations policies should have positive impacts for improving health. The Special Area and Strategic Mixed Use sites should help to deliver new housing and employment opportunities, both of which are wider determinants of health, should help to facilitate active travel and improve accessibility to various sites, should help facilitate delivery of various community uses, as well as public spaces which can facilitate social interaction as well as address certain site based impacts which can impact upon health such as noise pollution. Site allocations should also provide opportunities for employment and training which can help to reduce health inequalities. The H1 and H2 sites should also help to deliver new housing and some employment floorspace, however although the H1 sites generally had good access to services, some of the H2 sites did not, which could affect health and inclusion. In addition, some H1 and H2 sites were either within the AQMA, were subject to high levels of road noise, or had both issues, which would need to be addressed through appropriate design.

#### CPP2 overall

Overall, the cumulative effect of CPP2 should be **significantly positive** for health and well-being. The DM and Site Allocations policy requirements combine to help deliver numerous health determinants in particular housing and employment opportunities, should help to facilitate active lifestyles and opportunities for social interaction, should help to provide a healthy urban environment, should help to facilitate access to various services and are considered to provide a framework which addresses and reduces the likelihood of site based impacts that could impact upon health, such as environmental pollution.

## Improving community safety

### DM policies

Overall, the cumulative impact of the DM policies should have positive impacts for community safety. DM4, DM9 and DM10 all support opportunities that allow greater community interaction, such as through provision of shared community space or protection of uses, such as pubs, that provide for a local community's needs. The retail policies allow for changes of uses, which can help to reduce the risk of vacancies and therefore minimise opportunities for crime and reduce the fear of crime. DM24 should ensure that public safety is not compromised through poor design and siting of advertisements. The transport policies should ensure that developments are safe, in terms of road safety.

### Site allocation policies

Overall, the cumulative impact of the site allocations is positive for community safety. Some of the sites allocated are currently vacant and therefore development can help reduce any crime or fear of crime associated with these premises and delivery of mixed uses on sites can help to increase passive surveillance at different times of the day. Some of the sites allocated are in areas with a high crime deprivation, however all developments are required to incorporate features that design out crime, in accordance with CPP1 CP12 Urban Design.

### CPP2 overall

Overall, the cumulative effect of CPP2 should be **positive** for community safety. The allocation of sites for mixed uses in particular can help increase passive surveillance, the allocation of sites that are currently vacant or derelict can help to increase footfall and reduce the fear of crime, and the various DM policies should contribute towards community safety in various ways such as helping to minimise vacancy in retail centres, by providing opportunities for community interaction within local areas, and by ensuring developments contribute towards improving road safety.

## Increasing equalities and social inclusion

### DM policies

Overall, the cumulative impact of the DM policies should support equalities with some policies particularly supporting people with protected characteristics. DM1 should ensure a proportion of housing delivered is suitable for wheelchair users, as well as deliver accessible and adaptable homes that could support younger, older and ambulant disabled people. DM4 and DM5 are aimed specifically at providing quality housing for both older people and people with specialist housing needs, including disabled people. DM6 helps to reduce housing based deprivation through increasing the availability of rented housing. DM7 enables new HMOs to come forward in certain circumstances, again helping to meet the accommodation needs of people requiring low-cost housing although there is a degree of uncertainty with regards to how readily new HMOs will come forward with this policy due to the various criteria. The retail policies should ensure there is a balanced mix of uses in retail centres which can be of benefit to those who cannot travel further afield, such as younger, older and disabled people. DM23 should help to improve access into shops, DM32 should help to improve access to the Pavilion Estate, and DM39 should help to improve access to the seafront for all people, but would be of particular benefit to wheelchair users or those with particular access needs. DM34 has a particular requirement that transport interchanges must include provision for people with mobility difficulties and DM36 refers to the need for disabled parking provision. Policies on improving energy efficiency could help reduce the risk of future fuel poverty, which would be of particular benefit for the socio-economic deprived as well as older people who are more at risk of winter mortality.

### Site allocation policies

Overall, the cumulative impact of the site allocations should support equalities and social inclusion. All of the strategic mixed use sites require development to secure training for local people which could help to improve skills and employment prospects of socio-economic deprived and support social inclusion depending on take-up. Delivery of housing, including affordable housing can also help to reduce housing-based deprivation and any improvements that result in improving accessibility of the wider public realm can help improve access for all people, but particularly benefits those who are older, younger or who have mobility difficulties.

### CPP2 overall

Overall, the cumulative effect of CPP2 should be **positive** for equalities and social inclusion. The DM and Site Allocations policy requirements should combine and are considered to be inclusive for all communities, but will particularly benefit individuals who are older, younger and disabled through various improvements to access to public realm, shops, certain heritage assets and the seafront and through the protection of certain uses within retail centres; will benefit older, disabled and people with specialist housing needs through the provision of specialist housing types; and will benefit the socio-economic deprived through opportunities for training and employment.

#### Contributing towards economic development

##### DM policies

Overall, the cumulative impact of the DM policies should support economic growth. DM11 in particular should ensure that any new employment floorspace delivered is suitable for modern employment needs and is flexible to respond to changing markets. The retail policies DM12, DM13, DM14, and DM15 should ensure there is a balanced mix of uses in retail centres, promotes footfall and therefore supports vitality and viability in centres and special retail areas. DM16 supports new markets within retail centres which can also contribute towards increasingly vibrancy, vitality and footfall, having economic benefits. DM17 recognises the importance of attracting new visitors to the city, contributing towards the tourist economy and also safeguards conference facilities, again which play an important role in the local economy. Other policies that also have economic benefits include DM23, DM24 and DM25 by supporting business needs; all of the heritage policies, recognising the role that the city's built heritage assets plays in attracting tourists to the city; and all of the transport policies recognising the importance in tackling congestion and the local economy.

##### Site allocation policies

Overall, the cumulative impact of the site allocations is positive for economic development, with strategic mixed use sites including delivery of employment floorspace, and one site allocated for new business and warehouse uses. In addition, 13 of the H1 housing site allocations are allocated as mixed use sites with employment floorspace required. It is noted that some of the H1 allocations are where the existing or previous use is an employment use and will result in a net loss of employment floorspace, however the majority of these are where the building is vacant or not fit for modern employment needs, and therefore should not result in a loss of jobs or have significant effects on the local economy.

##### CPP2 overall

Overall, the cumulative effect of CPP2 should be **significantly positive** for economic development. The allocation of sites for employment uses provides a clear and direct indication that employment uses will be supported on these sites and could help to bring development forward; and the DM policies should ensure that any new floorspace delivered is flexible and can respond to future market changes, should ensure that retail centres remain attractive, vibrant and viable, and should ensure that the city remains an attractive place to visit for business or leisure purposes.

## **8.4 Overall Summary**

The cumulative impacts of the DM policies are considered to be positive overall.

Some of the cumulative impacts of the Site Allocations policies when looked at alone are more mixed overall particularly for some of the environmental objectives. Some sites have the potential to have multiple site-based effects around the site itself depending on the site, which together could combine to have cumulative adverse effects such as loss of biodiversity, landscape impacts, heritage impacts, increased congestion, reduced air/noise quality, risk of pollution to water, risk of surface water flooding, and loss of green infrastructure reducing the city's ability to adapt to climate change. With regards to the social and economic objectives, the Special Area and Site Allocation policies combine to provide an overall positive cumulative effect, through increasing housing provision, supporting delivery of the wider determinants of health, improving or increasing access to services, providing measures that could support community safety, supporting equalities and social inclusion and supporting economic growth. Some of the effects are likely to be significantly positive, including for housing, health, and economic development

When the DM and Site Allocation policies are considered together, the DM policies are considered to provide a policy framework which addresses and reduces the likelihood of potential adverse effects arising from development

on individual sites allocated across the site allocation policies, having a combined cumulative positive or neutral effect overall. Any effects arising from CPP2 on the Ashdown Forest SAC/SPA will be considered following completion of the Habitats Regulations Assessment.

## Section 9 How the SA has influenced CPP2

### 9.1 Introduction

This section summarised how the SA process has fed into the preparation of the CPP2.

### 9.2 Options Stage

Through the appraisal of alternative options, the SA helped to identify the most sustainable approach to policy development and should result in a Plan that achieves the widest range of sustainability benefits.

All options considered, and the outcome of the SA process at options stage can be found in detail in Appendix D.

### 9.3 Policy Stage

The appraisal at policy stage helped to identify whether impacts were likely to be beneficial or adverse. At this stage the SA helps to refine the policies by making recommendations either to reduce the likelihood of adverse effects or to maximise or strengthen positive effects. The SA also makes recommendations for mitigation, which in most cases should be addressed through implementation of other policies within CPP1 or CPP2.

The following table indicates where the SA made a recommendation to amend the policy when assessed at draft policy stage, and the officer response. All policies were reappraised following any changes and the SA revised where relevant.

**Table 9.1 Recommended Changes to Policies**

Policy	SA Recommendation	Officer Response
Private Outdoor Amenity Space (nb: within DM1 Housing Quality, choice and mix policy)	The impact on the objective relating to increasing equality is uncertain. The score for this objective could be made more positive if the supporting text included a paragraph which referred to ensuring the outdoor space provided meets the requirements of the intended occupier of the dwelling, e.g. in the case of specialist housing for disabled people.	Supporting text amended as suggested.
DM3 Residential Conversions	The impact on the objective relating to increasing equalities is uncertain. In order to provide clarity, the supporting text could provide further information in relation to “special housing needs”, e.g. who/what constitutes a special housing need.	Amended wording to be consistent with national policy e.g. specialist housing needs.
DM23 Shop Fronts	The impact on the objective relating to increasing equalities could be further strengthened by including a reference in the supporting text that links back to the requirements around accessibility. Suggest change to supporting text as follows: “There are usually sound reasons why a replacement shop front may be proposed. The existing one may be in poor condition, visually unattractive, unsuitable for the proposed use or may suffer from poor accessibility, <u>for example for</u>	Additional text added as recommended.

Policy	SA Recommendation	Officer Response
	<u>people with protected characteristics as defined by the Equalities Act 2010.</u>	
DM25 Communications Infrastructure	Policy requires for there to be no adverse or unacceptable effect on areas of ecological interest. Recommended to add a definition of “areas of ecological interest” within supporting text for clarity.	Policy text and supporting text changed and now refers to “Local Wildlife Sites”
DM28 Locally Listed Assets	The policy states that applications for demolition or substantial alteration will be expected to demonstrate that retention or reuse has been fully explored. The supporting text could provide further definition on what an applicant would need to submit in order to demonstrate this.	Additional paragraph added to supporting text to clarify.
DM34 Transport Interchanges	The policy could be strengthened further by including a specific reference to the SDNP. E.g. c) appropriate design and landscape measures are incorporated to minimise the visual and amenity impact, <u>particularly on areas of landscape importance and their setting including the setting of South Downs National Park;</u> Policy could include criteria that supported or prioritised development coming forward on brownfield sites or sites with contamination issues to maximise beneficial effects on protecting water quality/reducing flood risk/improving soil quality objectives. Could the supporting text have further information / justification on need for freight consolidation? E.g. reference to Strategic Transport Assessment or other evidence?	Change not implemented. Emerging CPP2 policy on designated sites will address this issue. Change not implemented. CPP1 SA5 Setting of the SDNP will address this issue.  Not included.
DM35 Travel Plans and Transport Assessments	It is noted that the DoT guidance on Transport Assessments (Appendix B) suggests that any development located within or adjacent to an AQMA should have a Transport Assessment. This could be referred to in the policy or supporting text to further strengthen the policy.	New policy point requiring TA when development situated adjacent or within an AQMA.
DM42 Protecting the Water Environment	Both the quantity and quality status of Brighton Chalk Aquifer are “poor”, therefore there is a need to improve both statuses. Suggest change to supporting text 2 <sup>nd</sup> sentence as follows: “There is a need to improve groundwater quality <u>and quantity</u> status.” Or “ <u>There is a need to improve groundwater status</u> ”.	Additional text added as recommended.
DM43 SUDS	The policy (paragraph three) requires SUDS” to promote an enhanced landscape where possible”. Could this be amended to also refer to “townscape” e.g. “an enhanced landscape/ <u>townscape</u> ...	Policy text amended as suggested.

Policy	SA Recommendation	Officer Response
	This would further strengthen the positive impacts on SA objective 4.	
DM46 Heating and Cooling Networks	It is recommended that the policy links to the emerging CPP2 policy on pollution and nuisance control, which should ensure that air quality impacts of CHP systems are considered and addressed.	Added as suggested
SA7 Benfield Valley	<p>Policy/supporting text could refer to opportunities to incorporate biodiverse SUDS as part of biodiversity mitigation, as this would have additional wider benefits in terms of supporting climate change adaptation and flood prevention. However it is recognised that emerging CPP2 policy on SUDS will require this.</p> <p>Policy/supporting text could refer to opportunities to reduce road noise impacts through design, to help mitigate against amenity/health impacts. However it is recognised that emerging CPP2 policy on Protection of the Environment and Health should ensure this issue is addressed.</p>	<p>Not included as addressed by other policy.</p> <p>Not included as addressed by other policy.</p>
SSA1 Brighton General Hospital	<p><u>7. To improve water quality (ecological, chemical and quantity status) &amp; 9. To reduce emissions of greenhouse gases that cause climate change</u> The policy does require a “high quality of design and sustainability” however it is not clear whether this relates to sustainable building standards such as water consumption/energy consumption for example and this could be clarified further in the supporting text.</p> <p><u>8. To reduce the risk from all sources of flooding to and from development</u> Low to medium risk of SW flooding on parts of site. Mitigation would be provided by emerging CPP2 policy on SUDS which requires there to be a reduction in surface water leaving a site. Could the supporting text refer to opportunities to incorporate SUDS within the open space and landscaping improvements?</p> <p><u>18. To increase equality and social inclusion</u> The site is located within the 10% most deprived SOA (employment and education domains). Development could provide training opportunities to increase skills locally. The policy could secure training for local people which would support access to training and employment and further strengthen positive impacts for this objective. E.g. see other strategic allocation requirements</p>	<p>Text relating to “sustainability” deleted from policy for clarity, as this paragraph deals more with design and impacts upon the listed building.</p> <p>Added as suggested.</p> <p>Added as suggested.</p>



Policy	SA Recommendation	Officer Response
	<p>“The developer will enter into a training place agreement to secure training for local people”.</p>	
<p>SSA2 Combined Engineering Depot</p>	<p><u>Objective 6:</u> It is recognised that policy DA4 includes the overarching requirement in relation to improving air quality through the area. However, as the site is within the AQMA and development could result in an increase in vehicle movements which could affect air quality, and as the site is adjacent to a streetscape which could suffer from the canyon effect, it is suggested that the policy could incorporate a reference relating to addressing air quality to highlight the importance of this issue in this area.</p>	<p>Added as suggested</p>
<p>SSA3 Land at Lyon Close</p>	<p><u>Objective 6 &amp; 16:</u> The northern part of the site is occupied by premises on the Peacock Industrial Estate and some retail units. This part of the site suffers from noise levels from the adjacent railway of more than 60dbcls. Noise levels above 55dbcls are considered to have a detrimental effect on health. It is recommended that the policy is amended to incorporate a requirement for development to respond to this, similarly to other strategic mixed use site allocations, e.g. “achieve a high quality of design and amenity which responds to the close proximity of the railway lines”</p>	<p>Added as suggested</p>
<p>SSA4 Sackville Trading Estate &amp; Coalyard</p>	<p><u>Objectives 5 and 16:</u> The policy requires pedestrian links to be provided however does not make any other reference to other forms of sustainable transport infrastructure. In accordance with other strategic mixed use site allocations, it is recommended the policy refer to securing improvements in sustainable transport infrastructure, including that for cyclists e.g: “Sustainable transport infrastructure improvements that provide and promote public and sustainable transport in particular safe pedestrian and cyclist access to the site will be required to support the mixed use development”. This should be in addition to requirements that improve pedestrian permeability.</p> <p><u>Objective 6:</u> There is no overarching priority with regards to air quality within DA6. It is recommended to include a reference to air quality similar to that found in DA4. E.g. Ensure improvements to local air quality through the</p>	<p>Added as suggested.</p> <p>Change not implemented. Requirements of emerging CPP2 policy on pollution control, as well as CPP1 CP9</p>

Policy	SA Recommendation	Officer Response
	<p>implementation of the council’s Air Quality Action Plan. Ensure new development proposals take into account impact upon local air quality and that improvements and/or mitigation are sought wherever possible.</p> <p><u>Objective 7:</u> It is recommended to add a reference to the GSPZ within the supporting text. E.g. The site is located within a Groundwater Source Protection Zone (zones 1 and 2). Development in this location will need to ensure that groundwater resources are protected from pollution.</p> <p><u>Objective 18 and 19:</u> It is recommended to include a policy reference which requires development to enter into training place agreements, to ensure consistency with other strategic mixed use policies and to strengthen positive impacts for equalities and social inclusion e.g. “The developer will enter into a training place agreement to secure training for local people”.</p>	<p>Sustainable Transport should address air quality issues.</p> <p>Added as suggested.</p> <p>Added as suggested</p>
SSA5 Madeira Terraces and Drive	The supporting text could include a reference to supporting implementation of the England Coast Path which would further strengthen the positive impact for promoting sustainable travel and supports sustainable access through the seafront.	Added to supporting text as suggested.
SSA6 Former Peter Pan site	Biodiversity - Although it is recognised that other overarching policy will apply in this area, the supporting text could refer to the need for development to protect ecological assets, reflecting the fact the site is adjacent to a designated site of nature conservation importance.	<p>Supporting text amended to refer to adjacent Volks’ Railway designation.</p> <p>New requirement to conserve and enhance biodiversity also added to policy text.</p>
SSA7 Land adjacent to AMEX stadium	<p>The site suffers from high levels of road noise and noise from the adjacent railway. Supporting text could cross reference to emerging CPP2 policy on noise nuisance to ensure that noise impacts are addressed.</p> <p>The site is within a GSPZ2. To reflect other Strategic Allocations within the DA3 area, the policy or supporting text could include a reference to this. E.g. “ Development must ensure that groundwater sources are protected, to the satisfaction of the Environment Agency” or include a cross reference to relevant CPP2 policy within supporting text to ensure impacts on the water environment are considered.</p>	<p>Requirement to address noise quality issues added to supporting text.</p> <p>New requirement added to policy text.</p>

Policy	SA Recommendation	Officer Response
H2 Housing on Urban Fringe	<p>Add to table to show key site considerations:</p> <ul style="list-style-type: none"> <li>• Archaeology: site 50</li> <li>• Surface water flood risk: site 50</li> <li>• Aquifer: sites 17, 42, 46a, 48 cluster and 50</li> </ul> <p>Amend policy point c) as follows to further support climate change adaptation:</p> <ul style="list-style-type: none"> <li>• <u>c. Green infrastructure</u> and local food growing opportunities are incorporated within the proposed scheme</li> </ul>	<p>All added as suggested.</p>          <p>Amended as suggested.</p>

## Section 10 Monitoring

### 10.1 Proposals for monitoring

As required by the SEA Regulations, the SEA should help to identify monitoring indicators to monitor the likely significant effects of CPP2.

A number of monitoring sustainability indicators were proposed to monitor the effects of CPP1, and as CPP2 leads builds upon and is intrinsically linked to CPP1, it is not suggested at this stage to add any additional indicators. The monitoring indicators therefore cover the sustainability effects of CPP1 and CPP2 and are set out in Table 10.1. These monitoring indicators will be reviewed at later stages of plan production if considered necessary.

In addition, a Monitoring & Implementation Framework is being proposed which sets out proposals for monitoring for a number of policies and is one of the documents published as part of the draft plan documents.

An Annual Monitoring Report will be produced to monitor the implementation of the CPP2 which will monitor progress and effects of CPP2.

**Table 10.1 Monitoring Indicators for CPP1 and CPP2**

SA Objective / Topic Area	Indicator
1) Biodiversity	Number and area of designated sites (SAC, SSSI, SNCI, LNR, AONB, RIGS).
	Percentage of area of SSSI land in <ul style="list-style-type: none"> <li>(a) favourable condition</li> <li>(b) unfavourable recovering condition</li> <li>(c) unfavourable no change condition</li> <li>(d) unfavourable declining condition</li> <li>(e) area part destroyed / destroyed</li> </ul>
	SQM of habitat or biodiversity features added or lost (citywide) as a result of development
2) Open Space	Amount of open space created or lost (citywide) as a result of development
3) SDNP	Number of bus services that operate to the South Downs from Brighton & Hove
	Amount of land under: <ul style="list-style-type: none"> <li>1) Entry level</li> <li>2) High level environmental stewardship schemes</li> </ul>
4) Heritage	Number and % of Listed Buildings that are Grade 1 and 2* <ul style="list-style-type: none"> <li>(a) on at risk register</li> <li>(b) subject to demolition</li> </ul>
5) Reduce need to travel	Car ownership per household
	Annual average daily traffic flow:

SA Objective / Topic Area	Indicator
	(a) Outer cordon sites: 5, 22, 608 and 620
	(b) City centre cordon sites: 74, 800, 809, 813
	Annual average daily cycle flow:
	(a) National Cycle Route 2 sites: 951, 967
	(b) National Cycle Route 90 sites: 960, 961
	Percentage of development where parking is provided for bicycles.
6) Air/noise quality	The area of the city in km <sup>2</sup> where the annual mean for nitrogen dioxide (calendar year) exceeds the national legal limit of >40 µg/m <sup>3</sup> (monitored and modelled NO <sub>2</sub> ).
	Improvement in levels of air quality in London Road, Lewes Road and Rottingdean areas.
7) Water	Status of the groundwater resource as measured by the requirements of the Water Framework Directive.
	Quality of bathing water
	Domestic consumption of water (litre of water per day per household)
	Percentage of new residential development achieving the water efficiency standard of 110litres/person/day.
8) Flood risk	Number of developments in a flood risk area granted contrary to the advice of the Environment Agency
	Percentage of new development incorporating SUDS within the development or beyond the development area.
9) Reduce greenhouse gas emissions	Kt of CO <sub>2</sub> per capita emitted from domestic sources for energy provision
	Average annual domestic consumption of gas and electricity
	Average annual commercial and industrial consumption of gas and electricity
	% of new residential development achieving the 19% carbon reduction improvement over Part L as required by CP8
	% of development with low/zero carbon energy proposed
10) To ensure developments have taken into account the	Percentage of new development incorporating green infrastructure such as green walls/roofs.

SA Objective / Topic Area	Indicator
changing climate	
11) Soil quality	Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act.
12) Waste	Residual household waste per household
	Percentage of household waste: <ul style="list-style-type: none"> <li>(a) recycled</li> <li>(b) composted</li> <li>(c) used to recover heat, power, and other energy sources</li> </ul>
	Percentage of development providing facilities for recycling.
13) To make the best use of land	Percentage of new and converted dwellings on Previously Developed Land
	Percentage of new employment land on Previously Developed Land
	Percentage of development situated on Greenfield land.
14) Housing	Net additional housing completions
	Net affordable housing completions
	House price to income ratio
	% of households considered to be suffering from over-crowding (having one less bedroom than required)
15) Access	Percentage of development that is within 500 m of the following: Doctors, accessible open space, bus stop/rail station, infant junior or primary school, retail provision.
16) To improve health	Life expectancy at birth (males, females - years)
	Obesity among primary school in year 6 (percentage)
	Adults achieving more than 150 minutes physical activity a week
	Percentage of population living in 20% most deprived Super Output Areas (health domain)
17) Community Safety	Number of total police recorded crimes.
	People killed or seriously injured in road traffic accidents
18) Equalities and social inclusion	Percentage of population living in the 20% most deprived super output areas in the country
	Percentage of population over 60 who live in households that are income

SA Objective / Topic Area	Indicator
	deprived
	Tackling fuel poverty - Percentage of people living in fuel poverty
	Percentage of young people who are not in employment, education or training (NEET);
	Percentage of non-decent council homes
19) Economic Development	Amount (£) of developer contributions secured for training for local residents, through the Local Employment Scheme
	Number and percentage of in-commuters compared to out-commuters
	Level of GVA per head
	Proportion of VAT registered businesses per 10,000 population
	Percentage population that are in employment

## Appendices



## Appendix A Review of Plans, Programmes and Guidance

The following documents were reviewed at Scoping Stage 2016.

<b>Biodiversity</b>
Birds Directive (79/409/EEC)
Habitats Directive (92/43/EEC)
Natural Environment and Rural Communities Act (2006)
The Natural Environment White Paper – The Natural Choice: securing the value of nature (NEWP, 2011)
The Wildlife and Countryside Act (1981)
Countryside and Rights of Way Act (2000)
Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services (Defra, 2011)
NPPF (2012)
ODPM Circular 06/2005
Biodiversity – Code of practice for planning and development
City Sustainability Action Plan (2015)
Sustainable Community Strategy (2014)
Local Biodiversity Action Plan v.4 BHCC (2013)
A Green Network for Brighton & Hove (2009)
Brighton & Lewes Downs Biosphere Management Strategy 2014-2019 (2013)

<b>Water Quality &amp; Resources</b>
Water Framework Directive (2000/60/EC)
A Blueprint to safeguard Europe’s Water Resources (EC, 2012)
Water for Life (White Paper) DEFRA Dec 2011
Future water: the Government's water strategy for England DEFRA Feb-08
NPPF (2012)
Water for people and the environment: Water Resources Strategy for England and Wales: Environment Agency Mar-09
The Flood and Water Management Act: 2010 HMSO 2010
Adur and Ouse Catchment Abstraction Management Strategies (CAMS) Environment Agency 2005

River Basin Management Plan for the South East. Environment Agency Dec-09
Water Resources Management Plan 2015-2040 (2014) Southern Water
Soil, Waste and Land Resources
Waste Framework Directive (2008/98/EC)
European Thematic Strategy for Soil Protection 2006
NPPF (2012)
Safeguarding our Soils: A Strategy for England (Defra, 2009)
Waste Management Plan for England (Defra 2013)
Government Review of Waste Policy in England Defra 2011
City Sustainability Action Plan 2015
Sustainable Community Strategy 2014
Brighton & Hove Municipal Waste Management Strategy (2010)
East Sussex, South Downs and Brighton & Hove Waste & Minerals Local Plan (2013)
Brighton & Hove's Contaminated Land Strategy BHCC Updated Sep '05

Ambient Air Quality and Cleaner Air for Europe 2008/50/EC European Parliament and Council 2008
EU Directive 2002/49/EC relating to the assessment and management of environmental noise
European Whitepaper 2011: Roadmap to a Single European Transport Area - Towards a competitive and resource efficient transport system (EC, 2011)
The Environment Act 1995 Part IV CLG HMSO 1995
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 (DfT2011)
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 (DfT 2013)
BH Air Quality Action Plan (2015)
City Sustainability Action Plan (2015)
Sustainable Community Strategy (2014)
BH Local Transport Plan 4 (2015-2019)

Noise Action Plan Brighton Agglomeration (DEFRA) 2010
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<b>Climate Change and Flooding</b>
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Kyoto Protocol to the United Nations Framework Convention on Climate Change Dec-97
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Renewable Energy Directive 2009/28/ec
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Energy Efficiency Directive (2012/27/EU
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EU Flood Risk Directive (2007/60/EC)
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Energy Act 2011
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Renewable Energy Strategy DECC 2009
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Climate Change Act HMSO 2008
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The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)
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The Flood and Water Management Act: 2010 HMSO 2010
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The National Flood and Coastal Erosion Risk Management Strategy for England (Defra and Environment Agency, 2011)
--

National Planning Policy Framework (CLG, 2012)
--

City Sustainability Action Plan (2015)
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Sustainable Community Strategy (2014)
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Climate Change Strategy BHCC 2011
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Renewable & Sustainable Energy Study AECOM 2012
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Shoreline Management Plan – Beachy Head to Selsey Bill First Review South Downs Coastal Group 2006
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Brighton Marina to River Adur Strategy 2012
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Brighton Marina to Saltdean Strategy 2001
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Brighton & Hove Strategic Flood Risk Assessment update JBA Consulting 2012
--

BH Surface Water Management Plan (2013)
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BHCC Flood Risk Management Strategy 2015
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<b>Cultural Heritage, Landscape and Open Space</b>
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European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)
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The European Landscape Convention (2000)
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National Parks & Countryside Act 1949 and Environment Act 1990
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Government's Statement on the Historic Environment for England (HM Gov, 2010)
National Planning Policy Framework (CLG, 2012)
Conservation Principles, Policies and Guidance (Historic England 2008)
Streets for All - South East English Heritage/DoT 2005
A Strategy for the Conservation of Brighton & Hove's historic built environment BHCC 2015
The Downland Initiative (BHCC) 2006
South Downs Landscape Character Assessment 2011
South Downs Green Infrastructure Framework Consultation Draft (Jan 2016)
Urban Characterisation Study BHCC 2009
Public Space Public Life Study BHCC 2008
Streetscape Design Guidelines (2010)
Open Space Sport and Recreation Study and Update (2009) (2011)
Allotment Strategy 2014-2024 BHCC 2014
Draft Seafront Strategy BHCC 2012
Food Strategy & Action Plan (2012)
Green Network for Brighton & Hove 2009
Public Rights of Way Improvement Plan 2007-2017
Indoor Sports Facilities Plan 2012-2022
Joint Health & Wellbeing Strategy 2015

<b>Population, Health and Inequalities</b>
European Health Strategy 'Together for Health: A Strategic Approach for the EU 2008- 2013' (2007)
NPPF 2012
Health & Social Care Act 2012
The Marmot Review: Implications for Spatial Planning (The Marmot Review Team, 2011)
Healthy Lives, Healthy People: Our Strategy for Public Health in England (HM Gov, 2010)
Equality Act 2010
City Sustainability Action Plan 2015
Sustainable Community Strategy (2014)
Strategy to Reduce Health Inequalities in Brighton & Hove Public Health Directorate 2005
Joint Strategic Needs Assessment 2013-2015

Joint Health & Wellbeing Strategy 2015
A Food Strategy and Action Plan for Brighton and Hove and update, Dig Deeper 2011 Brighton & Hove Food Partnership 2006 2012
Children & Young People's Plan 2009-2012 BHCC2009
Reducing Inequality Review OCSI and Educe Ltd for BHCC 2008
Annual Report of the Director of Public Health: Look Inequality (2015) (and updates)

<b>Housing</b>
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
Student Accommodation Study (2016)

<b>Local Economy, Employment, Skills and Education</b>
Europe 2020
Fixing the Foundations: Creating a more prosperous nation (HM Treasury) (2015)
The Plan for Growth (HM Treasury and BIS, 2011)
NPPF 2012
Regional Economic Strategy for South East England 2006 – 2016 SEEDA 2006
Coast to Capital: Strategic Economic Plan:Skills for Growth 2014
Coastal West Sussex and Greater Brighton Local Strategic Statement for Delivering Sustainable Growth 2015-2031
Brighton & Hove Economic Strategy 2013-2018 Economic Partnership and BHCC
Sustainable Community Strategy 2014
City Sustainability Action Plan 2015

Creative Industries in Brighton and Hove Report and Strategy BHCC2000
City Employment & Skills Plan 2016-2020
Employment Land Study NLP for BHCC 2012
A Refreshed Visitor Strategy 2008-2018 BHCC 2008
Retail Study Update BH 2011
BH Schools Organisation Plan 2013-2018

## Appendix B Baseline Information

(nb: baseline data taken from 2016 Scoping Report and shows the most recent data available at that time)

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"> <li>• Protect and enhance international and national designated sites (e.g. SAC, SSSI, NNR, LGS, MCZ).</li> <li>• Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species.</li> <li>• Protect and prevent the loss of irreplaceable habitats such as Ancient Woodland.</li> <li>• Recognise the contribution towards biodiversity from various types of open space</li> <li>• Increase understanding and access to biodiversity/nature for local people.</li> <li>• Provide opportunities to achieve a net gain in biodiversity</li> <li>• Recognise the importance of linear features for biodiversity connectivity and movement</li> <li>• Recognise the multi-functional benefits of ecosystem services provided by biodiversity and green infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Reported condition of international/national sites (% of area)</li> <li>• Area (ha) of sites subject to nature conservation designations</li> <li>• SQM habitat features added/lost (including net gains)</li> <li>• Number and percentage of sites where positive conservation management is being or has been implemented in the last five years.</li> </ul>	<ul style="list-style-type: none"> <li>• Castle Hill SAC: 43% favourable, 57% unfavourable recovering (2009-2015)</li> <li>• Marina to Newhaven Cliffs: 91% favourable, 9% unfavourable recovering (2014)</li> <li>• SAC/SSSI: 71.2ha (2 sites)</li> <li>• LNR/PLNR: 690ha (8 sites)</li> <li>• LWS/SNCI: 578ha (62 sites)</li> <li>• New Residential Developments in 2014/15 provided: 7.8 m<sup>2</sup> Open Water, 1109 m<sup>2</sup> Chalk/flower rich grassland, 200 m<sup>2</sup> Other (195 m<sup>2</sup> Green Wall/ 5 m<sup>2</sup> Reptile Hibernacula/refugia)</li> <li>• 50% of local sites were in positive conservation management (2013/14)</li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	<ul style="list-style-type: none"> <li>Improve links between existing and/or new biodiversity and the Green Network/Nature Improvement Area</li> </ul>		
<p>2. To protect and improve open space and green infrastructure and improve sustainable access to it</p>	<ul style="list-style-type: none"> <li>Contribute to meeting the city's open space, sports and recreation requirements</li> <li>Improve the quality and/or make better use of existing open space</li> <li>Replace existing open space with improved quality or quantity</li> <li>Improve sustainable access to existing or new open space</li> <li>Increase opportunities for use of open spaces, including the seafront</li> <li>Recognise the importance of the seafront, beach and sea</li> <li>Consider a landscape scale approach to open space and green infrastructure</li> <li>Protect and enhance public rights of way</li> <li>Encourage the incorporation/creation of various types of open space within development, including opportunities for food growing</li> </ul>	<ul style="list-style-type: none"> <li>Amount and type of open space/1,000 population</li> <li>Area of open space created or lost as a result of development</li> <li>Number of people on waiting list for an allotment</li> <li>Amount of all developer contributions/CIL provided towards open space enhancement/improvement</li> </ul>	<ul style="list-style-type: none"> <li>2.8ha/1,000 natural/semi-natural</li> <li>0.047ha/1,000 children's &amp; YP</li> <li>0.92ha/1,000 parks &amp; gardens</li> <li>0.59ha/1,000 amenity</li> <li>0.23ha/1,000 allotments (all 2009)</li> <li>New residential developments submitting a SC in 2014/15 created 1,945m2 open space</li> <li>1,265 people on waiting list for an allotment (2016)</li> <li>£401,611 collected in 2013/14</li> </ul>
<p>3. To protect, conserve and enhance the South Downs National Park and its</p>	<ul style="list-style-type: none"> <li>Protect the landscape character and special characteristics of the SDNP and its setting</li> <li>Protect and enhance important views to and from the SDNP</li> </ul>	<ul style="list-style-type: none"> <li>Number of applications permitted contrary to comments received by the SDNPA</li> <li>Number of sustainable routes</li> </ul>	<ul style="list-style-type: none"> <li>No consents granted (2014/2015)</li> <li>There are 33 bus routes that run from Brighton &amp; Hove covering access to various points and towns</li> </ul>



Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
setting, and improve sustainable access to it	<ul style="list-style-type: none"> <li>Encourage sustainable access to the SDNP</li> <li>Promote sustainable tourism to the SDNP</li> <li>Limit the impact of light pollution on the SDNP</li> <li>Protect and enhance public rights of way</li> </ul>	available to access the SDNP	in the Downs
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"> <li>Protect, conserve and enhance listed buildings, registered parks &amp; gardens, conservation areas and scheduled ancient monuments and their settings.</li> <li>Take account of assets on the Local List</li> <li>Recognise the potential for undesignated archaeological assets.</li> <li>Support the integration of new development into the built and historic environment</li> <li>Respect, maintain and strengthen local character and distinctiveness</li> <li>Promote high quality design that establishes a strong sense of place</li> <li>Take into account the existing character of adjacent communities and neighbourhoods.</li> </ul>	<ul style="list-style-type: none"> <li>Number of Grade I and II* Listed Buildings</li> <li>Number and % of Grade I and II* Listed Buildings on Historic England at risk register</li> <li>Number and % of Conservation Areas on Historic England at risk register</li> <li>Number of Conservation Areas de-designated, or parts, as a result of loss of historic or architectural detail</li> <li>% of Conservation Areas where the loss of historic detail is considered to be significant or very significant</li> </ul>	<ul style="list-style-type: none"> <li>479 Grade I and II* Listed Buildings</li> <li>9 LB (1.9%) on at risk register (2016)</li> <li>6 CA (17%) on at risk register (2016)</li> <li>No CA de-designated (2014/15)</li> <li>11.8% of CA: loss of detail significant/very significant (2014/2015)</li> </ul>
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve	<ul style="list-style-type: none"> <li>Encourage mixed-use development and sustainable communities that reduce the need to travel</li> <li>Encourage the location of development close to where use of sustainable transport</li> </ul>	<ul style="list-style-type: none"> <li>Car ownership/household</li> <li>% households with no car</li> <li>CO2 emissions from transport (kt/capita)</li> <li>% residential development with</li> </ul>	<ul style="list-style-type: none"> <li>0.86 cars/household (2011)</li> <li>38% households have no car (2011)</li> <li>1.1 tonnes/capita (2013)</li> <li>96% of the residential applications permitted with a Sustainability</li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
travel choice	<p>can be maximised</p> <ul style="list-style-type: none"> <li>• Improve public and sustainable transport infrastructure including links and access</li> <li>• Increase permeability and provide other measures to encourage health-beneficial forms of travel including cycling and walking</li> <li>• Promote low-carbon forms of transport</li> <li>• Improve road safety to encourage cycling and walking</li> <li>• Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations</li> <li>• Protect and enhance public rights of way</li> </ul>	<p>good access to local facilities</p> <ul style="list-style-type: none"> <li>• % development where cycle parking provided</li> <li>• % residents who travel to work by bus, cycle, on foot, by train, by car</li> <li>• % housing developments that are car free</li> </ul>	<p>Checklist in 2014/15 stated they allowed good, safe and direct access between the development and local facilities (2014/2015)</p> <ul style="list-style-type: none"> <li>• 92% of the residential applications permitted with a sustainability checklist including cycle parking</li> <li>• Census 2011: 24% bus/train; 37% car; 5% bike; 20% on foot</li> <li>• Data available from 2016</li> </ul>
6. To improve air and noise quality	<ul style="list-style-type: none"> <li>• Minimise the causes of air pollution</li> <li>• Reduce congestion</li> <li>• Reduce the need to travel by car</li> <li>• Support the development of cleaner technologies (e.g. low-emission vehicles)</li> <li>• Take account of Air Quality Management Areas, where relevant.</li> <li>• Support measures that reduce road related noise</li> </ul>	<ul style="list-style-type: none"> <li>• Change in size of AQMA</li> <li>• Annual mean concentration of PM10 at Beaconsfield Road and North Street locations</li> <li>• Annual mean concentration of PM2.5 at North Street &amp; Lewes Road continuous analyser</li> <li>• Annual mean concentrations (<math>\mu\text{g}/\text{m}^3</math>) of NO2 at North Street monitoring sites.</li> <li>• Annual mean concentrations (<math>\mu\text{g}/\text{m}^3</math>) of NO2 at London Road monitoring sites.</li> </ul>	<ul style="list-style-type: none"> <li>• 2013 AQMA designation unchanged.</li> <li>• Beaconsfield Road PM10: <math>28\mu\text{g}/\text{m}^3</math> (2012)</li> <li>• North Street PM10: <math>26\mu\text{g}/\text{m}^3</math> (2013)</li> <li>• Data to be reported from 2016 onwards</li> </ul> <p><u>London Road NO2 2015:</u></p> <ul style="list-style-type: none"> <li>• C18: <math>62.1\mu\text{g}/\text{m}^3</math></li> <li>• C19: <math>43.2\mu\text{g}/\text{m}^3</math></li> <li>• C20: <math>39.7\mu\text{g}/\text{m}^3</math></li> <li>• C23: <math>43.9\mu\text{g}/\text{m}^3</math></li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
		<ul style="list-style-type: none"> <li>• Annual mean concentrations (<math>\mu\text{g}/\text{m}^3</math>) of NO<sub>2</sub> at Rottingdean monitoring sites.</li> <li>• Annual mean concentrations (<math>\mu\text{g}/\text{m}^3</math>) of NO<sub>2</sub> Lewes Road continuous analyser.</li> </ul>	<p><u>North Street NO<sub>2</sub> 2015:</u></p> <ul style="list-style-type: none"> <li>• C11-C12 (Clock Tower): 91.9 <math>\mu\text{g}/\text{m}^3</math></li> <li>• C11: (Middle) 68.3 <math>\mu\text{g}/\text{m}^3</math></li> <li>• C10-C12: (Ship Street) 47.1 <math>\mu\text{g}/\text{m}^3</math></li> </ul> <p><u>Rottingdean (2015)</u></p> <ul style="list-style-type: none"> <li>• E23: 37.7 <math>\mu\text{g}/\text{m}^3</math></li> <li>• E22: 31.6 <math>\mu\text{g}/\text{m}^3</math></li> <li>• E21: 26.4 <math>\mu\text{g}/\text{m}^3</math></li> </ul> <ul style="list-style-type: none"> <li>• Lewes Road: 48.7 <math>\mu\text{g}/\text{m}^3</math> (2014/2015)</li> </ul>
7. To improve water quality (ecological, chemical and quantity status)	<ul style="list-style-type: none"> <li>• Encourage remediation of despoiled, degraded or contaminated land</li> <li>• Ensure remediation of land protects and enhances water resources</li> <li>• Ensure appropriate sustainable drainage solutions are implemented in GSPZ</li> <li>• Encourage sustainable drainage solutions including green infrastructure</li> <li>• Ensure the timely and necessary waste water treatment infrastructure is provided</li> <li>• Maintain high standards of bathing water quality, e.g. through timely provision of waste-water infrastructure</li> <li>• Reduce the risk of surface water run-off</li> <li>• Encourage sustainable use of water</li> </ul>	<ul style="list-style-type: none"> <li>• Groundwater status</li> <li>• Bathing water quality</li> <li>• % of residential development that achieve CP8 minimum standards for water efficiency</li> <li>• Domestic consumption of water/capita</li> <li>• % of non-residential development that achieves CP8 minimum BREEAM standards</li> <li>• % of development incorporating SUDS</li> </ul>	<ul style="list-style-type: none"> <li>• Poor (2016)</li> <li>• Excellent Bathing Water Quality across all 4 beaches (2015)</li> <li>• Will be reported from 2016 onwards</li> <li>• 132l/person/day (metered) (2012/13)</li> <li>• Will be reported from 2016 onwards</li> <li>• In 2014/15 2 (2.5%) of the approved new build residential applications which submitted a Sustainability Checklist included SUDs.</li> </ul>

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

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
		standards <ul style="list-style-type: none"> <li>• Number of schemes incorporating low/zero carbon energy infrastructure</li> </ul>	Sustainability Checklist in 2014/15 proposed LZC technologies
10. To increase the city's resilience and ability to adapt to climate change	<ul style="list-style-type: none"> <li>• Considers and mitigates the potential risks and consequences of flood risk and does not increase flood risk elsewhere.</li> <li>• Incorporates sustainable drainage techniques, including those that have benefits for biodiversity.</li> <li>• Incorporates features that may help to maintain temperatures, such as green roofs and tree-planting and recognise the services provided by ecosystems.</li> <li>• Ensures the design of development considers the future impacts of climate change.</li> <li>• Incorporates features to maximise efficient use of resources.</li> <li>• Encourage the sustainable use of water</li> </ul>	<ul style="list-style-type: none"> <li>• % development incorporating green walls / green roofs</li> <li>• % development situated on greenfield land</li> <li>• % development incorporating SUDS</li> </ul>	<ul style="list-style-type: none"> <li>• 24% of residential development permitted with a Sustainability Checklist incorporated either a green roof or a green wall</li> <li>• 9% of residential development on greenfield (2014/2015)</li> <li>• In 2014/15 2 (2.5%) of the approved new build residential applications which submitted a Sustainability Checklist included SUDs.</li> </ul>
11. To improve soil quality	<ul style="list-style-type: none"> <li>• Promote sensitive management of land in open space or agricultural uses</li> <li>• Encourage remediation of despoiled, degraded or contaminated land</li> <li>• Ensure development is delivered in a way that does not result in further dispersal of</li> </ul>	<ul style="list-style-type: none"> <li>• Area (ha) of land under an environmental stewardship scheme</li> <li>• Number of sites of contaminated land that have been identified as having potential for contamination</li> </ul>	<ul style="list-style-type: none"> <li>• 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)</li> <li>• There are at least 2805 prioritised</li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	contaminants <ul style="list-style-type: none"> <li>Encourage sustainable drainage solutions</li> </ul>		sites under Part 2 A of the Environmental Protection Act 1990
12. To minimise and sustainably manage waste	<ul style="list-style-type: none"> <li>Promote waste reduction, re-use, recycling and recovery in line with the waste hierarchy</li> <li>Facilitate improved accessibility to recycling and other waste management facilities, including composting</li> <li>Promote building design that is resource efficient and minimises construction waste</li> <li>Promote the use of secondary and recycled materials including the re-use of existing materials and buildings.</li> </ul>	<ul style="list-style-type: none"> <li>Amount of LACW waste (ton/annum)</li> <li>Residential household waste (kg/household)</li> <li>% household waste reused, recycled, composted or recovered</li> </ul>	<ul style="list-style-type: none"> <li>107,182 tonnes/annum (2014/15)</li> <li>840kg (107,182tonnes/126,827 households)</li> </ul> In 2014/15: <ul style="list-style-type: none"> <li>Reused: 21%</li> <li>Recycled: 3%</li> <li>Composted: 3%</li> <li>Recovered: 69%</li> </ul>
13. To make the best use of land available	<ul style="list-style-type: none"> <li>Regenerate derelict areas and areas of previously developed land</li> <li>Help to reduce the number of vacant buildings through adaptive re-use</li> <li>Maximise the efficient use of land by high density development in suitable locations</li> <li>Encourage low-car/car-free developments in accessible locations</li> <li>Maximise the efficient use of land e.g. through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings.</li> <li>Promotes some retention of ecosystem</li> </ul>	<ul style="list-style-type: none"> <li>% of new and converted dwellings on PDL</li> <li>% of employment land on PDL</li> <li>% of development on greenfield land</li> <li>Number of empty properties brought back into use</li> </ul>	<ul style="list-style-type: none"> <li>91% of dwellings on PDL (2014/15)</li> <li>100% employment land on PDL (2014/2015)</li> <li>9% residential and 0% employment on greenfield land (2014/15)</li> <li>158 empty properties brought back into use (2014/2015)</li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	services on Greenfield sites with development potential		
<b>Social</b>			
14. To provide housing, including affordable housing, to contribute towards meeting local needs	<ul style="list-style-type: none"> <li>• Help to boost housing supply and help meet the housing target</li> <li>• Provide a wide mix of housing types, sizes and tenures.</li> <li>• Increase the availability of affordable housing</li> <li>• Address the housing needs for various sections of the community including students, older people, disabled people, families, gypsies and travellers, and smaller households.</li> <li>• Provide decent, high quality housing that can meet changing requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Net annual additional dwellings</li> <li>• Number of affordable housing completions: social rented/intermediate housing</li> <li>• Number student bedspaces delivered</li> <li>• House price to income ratio</li> <li>• Number of Gypsy and Traveller pitches delivered</li> <li>• Number of households on the housing register</li> </ul>	<ul style="list-style-type: none"> <li>• 581 dwellings (net) (2014/15)</li> <li>• 132 affordable dwellings of which 44 social rented and 88 intermediate housing (14/15)</li> <li>• 390 student bedspaces (14/15)</li> <li>• Ratio: 10.67 (income £28,204 to average price £301,356) (2016)</li> <li>• No new Gypsies and Travellers pitches delivered however development of 12 permanent pitches commenced in 2015</li> <li>• 21,042 households on the housing register (as at April 2015)</li> </ul>
15. To improve the range, quality and accessibility of services and facilities.	<ul style="list-style-type: none"> <li>• Increase provision of key local services and facilities, such as health, education, cultural, recreation, community and retail, including food</li> <li>• Ensure the vitality of town, district and local shopping centres</li> <li>• Improve access to local services and facilities by sustainable transport.</li> <li>• Enable communities to meet their day-to-day needs locally</li> </ul>	<ul style="list-style-type: none"> <li>• Number of approved Assets of Community Value</li> <li>• Net amount of "A" use floorspace approved (A-A5)</li> <li>• Net amount of "D" use floorspace approved (D1-D2)</li> <li>• Vacancy rates in Town Centres and District Centres</li> </ul>	<ul style="list-style-type: none"> <li>• 3 successful applications (2014/15)</li> </ul> <p>2014/2015:</p> <ul style="list-style-type: none"> <li>• A1: 2,357m<sup>2</sup></li> <li>• A2: -499m<sup>2</sup></li> <li>• A3: 903m<sup>2</sup></li> <li>• A4: -256m<sup>2</sup></li> <li>• A5: 116m<sup>2</sup></li> <li>• D1: 8,735m<sup>2</sup></li> <li>• D2: -1,395m<sup>2</sup></li> </ul> <p>2013/2014:</p>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
			<ul style="list-style-type: none"> <li>• Brighton: 5%</li> <li>• Hove TC: 3%</li> <li>• London Road TC: 9%</li> <li>• St James Street DC: 9%</li> <li>• Lewes Road DC: 9%</li> <li>• Boundary Road DC: 5%</li> </ul>
16. To improve health and well-being, and reduce inequalities in health	<ul style="list-style-type: none"> <li>• Encourage and facilitate walking and cycling</li> <li>• Facilitate opportunities that promote physical activity and supports mental well-being, e.g. through access to various types of open space.</li> <li>• Improve environmental quality and therefore minimise adverse impacts on health from various forms of pollution</li> <li>• Reduce the likelihood of health inequalities through improvements to the social determinants of health</li> <li>• Improve access to health facilities</li> <li>• Encourage the development of mixed and balanced communities with opportunities for community interaction.</li> </ul>	<ul style="list-style-type: none"> <li>• % population who travel to work on foot/by bike</li> <li>• % population who's day to day activities limited a little or a lot by health or disability</li> <li>• Male and female life expectancy</li> <li>• Male and female healthy life expectancy</li> <li>• % reception year children who are obese</li> <li>• % Adults achieving more than 150 minutes physical activity a week</li> <li>• Number of developments providing sports facilities or space on site</li> </ul>	<ul style="list-style-type: none"> <li>• 5% by bike; 20% on foot (2011)</li> <li>• 16.3% of population activities limited by health</li> <li>• Male: 78.8 (2011-2013)</li> <li>• Female: 83.1 (2011-2013)</li> <li>• Male: 62.8 (2014)</li> <li>• Female: 64.4 (2014)</li> <li>• 7.3% (2013/2014)</li> <li>• 56.2% (2014)</li> <li>• None (2014/2015)</li> </ul>
17. To improve community safety, and reduce crime and fear of crime	<ul style="list-style-type: none"> <li>• Promote design that facilitates greater community interaction</li> <li>• Provide opportunities for greater community interaction</li> </ul>	<ul style="list-style-type: none"> <li>• Number total police recorded crime</li> <li>• % residents who say they feel unsafe in their local area after dark</li> <li>• Numbers killed or seriously injured</li> </ul>	<ul style="list-style-type: none"> <li>• 23,372 recorded crimes (2015)</li> <li>• 11% feel unsafe after dark (City Tracker 2015)</li> <li>• 158 killed or seriously injured in</li> </ul>



Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
	<ul style="list-style-type: none"> <li>Seek to minimise crime and facilitates improvements in community safety</li> <li>Seek to improve road safety</li> <li>Encourage communities to value the local environment</li> </ul>	in road traffic accidents	2014/2015
18. To increase equality and social inclusion	<ul style="list-style-type: none"> <li>Consider the needs of all members of the community, particularly those with protected characteristics</li> <li>Improve access to education, life-long learning and training opportunities, especially</li> <li>Contribute towards reducing deprivation</li> <li>Improve access to employment</li> <li>Encourage the development of mixed communities.</li> </ul>	<ul style="list-style-type: none"> <li>% population that believe people from all backgrounds get on well together</li> <li>% population in fuel poverty (households spending more than 10% of income on fuel)</li> <li>% children in poverty (children living in families in receipt of out of work benefits)</li> <li>% and amount of LSOA in most 20% deprived (all domains)</li> <li>% and amount of LSOA in most 20% deprived (education domain)</li> <li>% and amount of LSOA in most 20% deprived (employment domain)</li> <li>% children achieving 5 GCSEs</li> <li>% children in receipt of Free School Meals achieving 5 GCSEs</li> </ul>	<ul style="list-style-type: none"> <li>91% - get on well (2015)</li> <li>11.9% - in fuel poverty (2013)</li> <li>17.5% children in poverty (2012)</li> <li>34 LSOA (21%) in 20% most deprived (all domains) IMD2015</li> <li>30 LSOA (18%) in 20% most deprived (education domain) IMD2015</li> <li>26 LSOA (16%) in 20% most deprived (employment domain) IMD2015</li> <li>61% attain 5 GCSEs (All) (2014/2015)</li> <li>33% attain 5 GCSEs (FSM) (2013/2015)</li> </ul>
<b>Economic</b>			
19. To contribute towards the growth of	<ul style="list-style-type: none"> <li>Help increase the supply of land in employment uses</li> </ul>	<ul style="list-style-type: none"> <li>GVA per head</li> <li>Average weekly wages (residents)</li> </ul>	<ul style="list-style-type: none"> <li>GVA/head £24,161 (2014)</li> <li>Residents annual earnings £28,444</li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
<p>a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>	<ul style="list-style-type: none"> <li>• Support existing, new and emerging sectors</li> <li>• Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace</li> <li>• Enable the growth of high value, low carbon business</li> <li>• Allow for flexible working practices</li> <li>• Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment.</li> <li>• Increase the quantity and quality of employment opportunities in a range of different sectors.</li> <li>• Enable local people to gain new skills to increase their employment opportunities</li> <li>• Facilitate access to employment by sustainable transport</li> </ul>	<p>and workplace)</p> <ul style="list-style-type: none"> <li>• Amount of money secured via Developer Contributions for training through the Local Employment Scheme</li> <li>• Net amount B use floorspace approved (B1-B8)</li> <li>• Amount of B uses floorspace lost to residential uses</li> <li>• % working age population in employment</li> <li>• % working age population unemployed</li> <li>• % working age population claiming out of work benefits</li> <li>• % population with no qualifications</li> <li>• Amount and % of people travelling out of the city for work</li> </ul>	<p>(2015)</p> <ul style="list-style-type: none"> <li>• Workplace annual earnings £26,728 (2015)</li> <li>• LES contributions £159,980 (2014/2015)</li> <li>• 2014/2015 overall net loss of - 4,098m2 as follows:</li> <li>• B1a: -3,486m2</li> <li>• B1b: -410</li> <li>• B1c: -181</li> <li>• B2: -394</li> <li>• B8: 373</li> <li>• 5,700m2 emp. floorspace lost to residential development via prior approval (2014/2015)</li> <li>• 71.1% of working age population in employment (2015)</li> <li>• 5.6% of working age population unemployed</li> <li>• 1.4% of the working age population claim out of work benefits (2015)</li> <li>• Census 2011 – working age population with no qualifications: 5.6%</li> <li>• 31,915 daily in-commuters</li> <li>• 37,310 daily out-commuters (19% of</li> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data
			working age population at time of Census)

## Appendix C Consultation Comments and Responses to Scoping Report 2016

### Written Responses

11 respondents indicated that they were submitting responses on the Sustainability Appraisal Scoping Report, however 2 of these respondents did not actually complete any questions.

The following 9 respondents provided a response to some of the questions. This includes a “don’t know/not sure” response.

- Respondent (50)
- Ovingdean Residents and Preservation Society (97)
- Respondent (104)
- Deans Preservation Group (108)
- Respondent (113)
- Respondent (152)
- Environment Agency (176)
- East Sussex County Council (178)
- Unknown respondent 3 (192)

The following 2 respondents did not provide any answers to any of the questions.

- Respondent (96)
- Unknown respondent 5 (195)

The following table includes the main comments received by respondents and the officer response where relevant. Some respondents only answered “don’t know/not sure” to all questions and this is indicated in the table.

Where a respondent has clearly denoted which section of the topic chapter the response refers to (e.g. baseline, sustainability issues) the relevant section is recorded at the beginning of the response. Where a respondent has not denoted which section the response refers to, the section considered to be of most relevant is recorded in brackets at the beginning of the response. Some comments are considered to be more general in nature and may not have a relevant section.

Respondent Number	Representation		Officer Response
	Topic section	Summary of Response/Comment	
50	Biodiversity & Geodiversity	Don't know/not sure response submitted to all questions.	N/A
	Cultural Heritage & Landscape	Don't know/not sure response submitted to all questions.	N/A
	Population & Human Health	Don't know/not sure response submitted to all questions.	N/A
	Housing & Community	Don't know/not sure response submitted to all questions.	N/A
96	Biodiversity & Geodiversity	No answers provided to any questions in this section.	N/A
97 Ovingdean Residents & Preservation Society	Biodiversity & Geodiversity	<p>General comments</p> <ul style="list-style-type: none"> <li>Concern that the identification of urban fringe sites as having development potential in CPP1 has given the signal that development can go ahead without a planning application having been submitted.</li> <li>Concern that there are no policies in</li> </ul>	<p>Comments not considered to be directly relevant to the Sustainability Appraisal.</p> <ul style="list-style-type: none"> <li>CPP1 Policy SA4 Urban Fringe sets out the policy with regards to urban fringe sites, however it is agreed that this policy is only applicable once a planning application has been submitted.</li> <li>There are certain situations whereby there is some</li> </ul>

		<p>place to protect these urban fringe sites prior to a planning application being submitted, e.g. clearing (of trees).</p> <p>Also, see note * and ** at the end of this table.</p>	<p>protection of some sites or elements of sites regardless of whether those sites are subject to a planning application. For instance, where a Tree Preservation Order is in existence, Planning Enforcement can investigate prohibited activity. Certain species are protected under the Wildlife &amp; Countryside Act and any prohibited activity is a criminal offence.</p>
Air Quality & Transport *	<p>Baseline Information section:</p> <ul style="list-style-type: none"> <li>This should include Brighton based data, rather than Sussex-wide data for both transport and pollution.</li> </ul> <p>(Baseline/Sustainability Issues sections)</p> <ul style="list-style-type: none"> <li>Details regarding transport infrastructure should be provided as should the strategic long term approach to traffic movement.</li> <li>Measures which address congestion issues on the A27, A259 and A23 should be considered.</li> <li>The current Park &amp; Ride facility does not work.</li> </ul>	<ul style="list-style-type: none"> <li>Brighton based air quality and transport data has been used within this section. No Sussex wide data has been used.</li> <li>The SA includes information on the strategic road network, the rail network, the bus network the cycle network and the PROW network. More information regarding coach travel will be provided under “Public Transport. The long term strategy for traffic movement is outlined in LTP4, which is referred to within Appendix A.</li> <li>The SA refers to issues of congestion on the A27, A259 and A23 however it is not the role of the SA to set out measures to address this issue.</li> <li>More information on the existing Park &amp; Ride will be added to the “Travel by Road” section.</li> </ul>	
Housing & Community **	<p>(Baseline/Sustainability Issues sections)</p> <ul style="list-style-type: none"> <li>More information on student accommodation including the future direction of student housing should be included.</li> <li>Query regarding whether student numbers will continue to rise based on</li> </ul>	<ul style="list-style-type: none"> <li>Paragraph 3.83.31 provides some baseline information with regards to students. Additional information regarding number of bed spaces in purpose built accommodation will be provided. The strategy for the future of student accommodation is set in policy CP21 of CPP1.</li> <li>The Universities have indicated that the numbers of</li> </ul>	

		the role that technology, home working and online learning has.	students is anticipated to increase in the future.
104	Air Quality & Transport	<p>Sustainability Appraisal Objectives</p> <ul style="list-style-type: none"> <li>• Comment regarding there being no agreed definition of sustainability and in its most common use is that “it should do no harm to the environment”.</li> <li>• Concern that development of urban fringe sites will harm the SDNP, will generate additional traffic and reduce air quality (particularly Rottingdean High Street).</li> </ul> <p>DMC:</p> <ul style="list-style-type: none"> <li>• DMC should allow more weight to be given to the views and comments of local communities.</li> </ul>	<ul style="list-style-type: none"> <li>• The definition of sustainability or sustainable development is established various international and national policy as development which meets the needs of the present within compromising the ability of future generations. The NPPF para 7 sets out the three dimensions to sustainable development as economic, social and environmental, and that gains in all three dimensions should be sought.</li> <li>• Concerns noted. The Sustainability Appraisal will play a role in helping to identify constraints that may not yet have been identified by the Urban Fringe Assessments (2014 and 2015) and further details and studies requesting at future planning application stage will assess more detailed matters.</li> <li>• DMC for the SA are not weighted. The comments and views of local communities are all considered equally at planning application stage.</li> </ul>
	Climate Change & Flooding	<p>DMC:</p> <ul style="list-style-type: none"> <li>• DMC should allow more weight to be given to the views and comments of local communities.</li> </ul>	<ul style="list-style-type: none"> <li>• DMC for the SA are not weighted. The comments and views of local communities are all considered equally at planning application stage.</li> </ul>
108 Deans Preservation Group	Biodiversity & Geodiversity	<p>Baseline section:</p> <ul style="list-style-type: none"> <li>• Species data held by the Sussex Biodiversity Records Centre should be referred to at all times in decision making and should be enshrined in policy.</li> </ul> <p>DMC (sites):</p>	<ul style="list-style-type: none"> <li>• A Biodiversity Data section will be added to the Current Baseline section to refer to the information held by the SBRC. Due to the wealth of data the SBRC holds, it will not be possible to summarise the data held in the SA. The SA site assessments will make use of the species inventory provided by the SBRC which includes a reporting of a BAP</li> </ul>

		<ul style="list-style-type: none"> <li>Concern that ecologically important sites could be overlooked and that sites without a designation should have recognition if they contain species or habitats listed in the LBAP.</li> </ul> <p>General comment:</p> <ul style="list-style-type: none"> <li>Suggestion that there should be a process for designating new sites as Local Wildlife Sites where new data is available.</li> </ul>	<p>species, bats, notable birds, protected species and rare species however does not provide details on the actual species reported.</p> <ul style="list-style-type: none"> <li>DMC site assessment criteria include consideration of BAP species. The SA site assessments will make use of the species inventory GIS data provided by the SBRC, which includes BAP species as noted above.</li> <li>Comment noted although not of direct relevance to the SA.</li> </ul>
113	Cultural Heritage & Landscape	Don't know/not sure response submitted to all questions.	N/A
	Population & Human Health	Don't know/not sure response submitted to all questions.	N/A
	Housing & Community	Don't know/not sure response submitted to all questions.	N/A
152	Biodiversity & Geodiversity	<p>General comment:</p> <ul style="list-style-type: none"> <li>SA4 is biased towards mitigating damage rather than avoiding damage to urban fringe sites.</li> </ul>	<ul style="list-style-type: none"> <li>This comment is not considered to be of relevance to the SA Scoping Report. "SA4" is the Urban Fringe policy in CPP1.</li> </ul>
	Water Quality & Resources	Don't know/not sure response submitted to all questions.	N/A
	Air Quality & Transport	Don't know/not sure response submitted to all questions.	N/A
	Cultural Heritage & Landscape	<p>Sustainability Issues section:</p> <ul style="list-style-type: none"> <li>Insufficient weight given to landscape.</li> </ul>	<ul style="list-style-type: none"> <li>Landscape character and a section on the SDNP is included within the Baseline Information section. Potential future issues are set out in the Likely Future Baseline section. Key</li> </ul>



			landscape issues are set out in the Sustainability Issues section. The SA includes a SA objective dedicated to protecting, conserving and enhancing the SDNP which will be considered equally alongside other SA objectives in future appraisals.
176 Environment Agency	Biodiversity & Geodiversity	SA Objectives: <ul style="list-style-type: none"> <li>SA objective for biodiversity supported</li> </ul>	<ul style="list-style-type: none"> <li>Comment noted and welcomed.</li> </ul>
	Water Quality & Resources	(Baseline and Sustainability Issues sections): <ul style="list-style-type: none"> <li>The Scoping Report covers the CHaMP project quite well.</li> </ul> SA Objectives: <ul style="list-style-type: none"> <li>SA objective for water quality supported.</li> </ul> DMC: <ul style="list-style-type: none"> <li>DMC could refer to appropriate SUDS measures to make sure the location of new development is considered and appropriate SUDS methods are implemented. This is especially important in GSPZ1.</li> <li>DMC could include the timely and necessary waste water treatment infrastructure to support new development. Adequate waste water management will help protect and improve water quality.</li> </ul>	<ul style="list-style-type: none"> <li>Comment noted and welcomed.</li> <li>Comment noted and welcomed.</li> <li>DMC for SA objective 7 will be amended as follows: <u>Ensure appropriate sustainable drainage solutions are implemented in GSPZ</u></li> <li>DMC for SA objective 7 will be added as follows: <u>Ensure the timely and necessary waste water treatment infrastructure is provided</u></li> </ul>
	Climate Change & Flooding	SA Objectives: <ul style="list-style-type: none"> <li>SA objective for flood risk reduction supported</li> </ul>	<ul style="list-style-type: none"> <li>Comment noted and supported</li> <li>Indicator will be added to Baseline Data table as follows: "Number of planning permissions granted contrary to the</li> </ul>

		<p>Baseline Data:</p> <ul style="list-style-type: none"> <li>Recommended to include an indicator which relates to decisions made in accordance with advice on surface water flooding from the Lead Local Flood Authority.</li> </ul>	<p>advice of the Lead Local Flood Authority on grounds of surface water flooding.”</p>
178 East Sussex County Council	Biodiversity & Geodiversity	<p>Introductory section:</p> <ul style="list-style-type: none"> <li>Para 3.11.1 should recognise the indirect impacts to habitats and species such as disturbance, increased recreational pressure and increased predation.</li> </ul> <p>Context Review:</p> <ul style="list-style-type: none"> <li>Include East Sussex GI Study; ODPM Circular 06/2005; and Biodiversity –Code of practice for planning and development.</li> </ul> <p>Baseline Data (Appendix):</p> <ul style="list-style-type: none"> <li>Indicator SQM of habitat gained/lost does not state how much was lost and therefore there is no figure for net gain.</li> </ul> <p>Baseline section:</p> <ul style="list-style-type: none"> <li>Para 3.13.21 RIGGS are now referred to as Local Geological Sites LGS.</li> </ul> <p>Likely future baseline section:</p> <ul style="list-style-type: none"> <li>The baseline review should recognise gaps in knowledge and understanding. Habitats and species surveys are not comprehensive and data is lacking with</li> </ul>	<ul style="list-style-type: none"> <li>Amend paragraph 3.11.2 to refer to indirect impacts as suggested and consider within appraisals.</li> <li>Add relevant documents to Context Review as suggested</li> <li>Add data to indicator as suggested.</li> <li>Amend incorrect references from RIGGS To LGS as suggested: paragraph 3.13.20 and .22, Sustainability Appraisal Framework pages 22 and 140, and Appendix B – Baseline Data table.</li> <li>Although there is a reference to lack of biodiversity data for some sites within the Data Limitations section, additional references on this matter will be added to the Data Limitations section as suggested,. and also to the Likely Future Baseline section to recognise there are gaps in knowledge and understanding and particularly that data</li> </ul>

		<p>respect to identifying trends over time.</p> <p>Sustainability Issues section:</p> <ul style="list-style-type: none"> <li>• Para 3.15 should recognise that not all sites that support priority habitats and species have a designation.</li> </ul>	<p>is lacking to allow trends over time to be identified.</p> <ul style="list-style-type: none"> <li>• A reference to the fact that not all sites that support priority species have a designation will be added to the Sustainability Issues section.</li> </ul>
	Cultural Heritage & Landscape	<p>Baseline section:</p> <ul style="list-style-type: none"> <li>• The baseline assessment covers all topics and issues relevant to landscape and open space in the city.</li> <li>• Para 3.63.12 incorrectly refers to “Historic Parks and Gardens” which should be referred to as Registered Parks and Gardens.</li> </ul> <p>SA Objectives:</p> <ul style="list-style-type: none"> <li>• SA objective for cultural heritage, SDNP and open space are supported and address the threats and opportunities of relevance to the Plan.</li> </ul> <p>DMC (policies):</p> <ul style="list-style-type: none"> <li>• DMC are thorough and comprehensive in terms of conservation and enhancement of landscape and townscape.</li> <li>• Amend incorrect reference to “Historic Parks and Gardens”</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted and welcomed</li> <li>• Amend incorrect references from Historic to Registered Parks &amp; Gardens as follows: para 3.63.12; para 3.64.3; DMC pages 84, 85, 141 and 146; and Baseline Data table page 194.</li> <li>• Comment noted and welcomed.</li> <li>• Comment noted and welcomed.</li> <li>• Amend DMC as suggested.</li> </ul>
192 Unknown Respondent 3	Biodiversity & Geodiversity	Don't know/not sure response submitted to all questions.	N/A
	Water Quality	Don't know/not sure response submitted to	N/A

	& Resources	all questions.	
	Soil, Waste & Land Resource	Don't know/not sure response submitted to all questions.	N/A
	Air Quality & Transport	Don't know/not sure response submitted to all questions.	N/A
	Climate Change & Flooding	Sustainability Issues section: <ul style="list-style-type: none"> <li>• Include more information on energy efficiency.</li> </ul> Don't know/not sure responses submitted to all other questions in this section.	
	Cultural Heritage & Landscape	Don't know/not sure response submitted to all questions.	N/A
	Population & Human Health	Don't know/not sure response submitted to all questions.	N/A
	Housing & Community	Don't know/not sure response submitted to all questions.	N/A
	Economy, Employment & Skills	Don't know/not sure response submitted to all questions.	N/A
195 Unknown Respondent 5	All	No answers provided to any questions in any sections.	N/A

\* and \*\* Ovingdean Residents and Preservation Society indicated that their response related to the Biodiversity section. However, as the comments received covered the issues of transport and housing, their comments have been noted under those sections.

## Workshop Comments

There was one consultation workshop to gather feedback on the proposed Sustainability Appraisal Framework. This was held as part of the Sustainability and Environment Consultation workshop, 9<sup>th</sup> September 2016.

Participants were asked to comment on the proposed 19 Sustainability Appraisal Objectives and proposed Decision Making Criteria that will be used for the policy assessments.

The following table shows the comments received on each of the SA Objectives and the officer response.

Comments	Officer Response
<b>SAO1 Biodiversity</b>	
<ul style="list-style-type: none"> <li>DMC should include protection and enhancement of a wider range of sites, including allotments.</li> </ul>	<ul style="list-style-type: none"> <li>DMC added as follows: <u>“Recognise the contribution towards biodiversity from various types of open space”</u></li> </ul>
<ul style="list-style-type: none"> <li>DMC should include enhancements to habitats or linear features to ensure connectivity and reduce breaks</li> <li>Non severance of linear features such as hedgerows of great importance to biodiversity (<i>put under 2 but also of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>DMC added as follows: <u>“Recognise the importance of linear features for biodiversity connectivity and movement”</u></li> </ul>
<ul style="list-style-type: none"> <li>Add protect and enhance marine water quality (<i>nb. Was put under SA2 but also of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC as follows: Protect and enhance international and national designated sites (e.g. SAC, SSSI, NNR, RIGS, <u>MCZ</u>)</li> </ul>
<ul style="list-style-type: none"> <li>Designations need to be linked with up to date information</li> </ul>	<ul style="list-style-type: none"> <li>No change to DMC or SA objective. Up to date information will be made use of during any site assessments, where relevant and available.</li> </ul>
<ul style="list-style-type: none"> <li>Net gains in biodiversity need to be more creative, and not just bat/bird boxes. Need to think about all supporting features. (<i>nb. No examples provided</i>)</li> </ul>	<ul style="list-style-type: none"> <li>No change to DMC or SA objective from this comment, however this can be considered at assessment stage.</li> </ul>
<b>SAO2 Open Space / GI</b>	
<ul style="list-style-type: none"> <li>Amend DMC “Improve the quality <u>and /</u> or make better use of existing open space”</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC as suggested: Improve the quality <u>and /</u> or make better use of existing open space</li> </ul>

<ul style="list-style-type: none"> <li>• Add protect and enhance marine water quality</li> </ul>	<ul style="list-style-type: none"> <li>• No change to DMC for this objective. Marine water quality better addressed under SA Ob 1 and SA Ob 7.</li> </ul>
<ul style="list-style-type: none"> <li>• Add protect and enhance marine recreation</li> </ul>	<ul style="list-style-type: none"> <li>• Add new DMC as follows: “<u>Recognise the importance of the seafront, beach and sea</u>”.</li> </ul>
<ul style="list-style-type: none"> <li>• Open space needs to include community food growing and allotments</li> </ul>	<ul style="list-style-type: none"> <li>• Opportunities for food growing e.g. allotments are included within the broader definition of open space however amend DMC as follows: Encourage the incorporation/creation of various types of open space within development, <u>including opportunities for food growing for example.</u></li> </ul>
<ul style="list-style-type: none"> <li>• Non severance of linear features such as hedgerows of great importance to biodiversity</li> </ul>	<ul style="list-style-type: none"> <li>• DMC added to SA 1 (biodiversity) as follows: “<u>Recognise the importance of linear features for biodiversity connectivity and movement</u>”</li> </ul>
<ul style="list-style-type: none"> <li>• Add reference to landscape scale approach and green infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Add new DMC as follows: “<u>Consider a landscape scale approach to open space and green infrastructure</u>”</li> </ul>
<ul style="list-style-type: none"> <li>• Extra assessment required for urban fringe sites – LVIA, dark night skies, GI opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• All sites which are considered for allocation will be subject to SA site assessment which will include broad consideration of impacts on landscape, SDNP and open space. Detailed assessments will be required as part of any planning application.</li> </ul>
SAO3 SDNP	
<ul style="list-style-type: none"> <li>• Extra assessment required for urban fringe sites – LVIA, dark night skies, GI opportunities (<i>was put under SA2 but also of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• All sites which are considered for allocation will be subject to SA site assessment which will include broad consideration of impacts on landscape, SDNP and open space. Detailed assessments will be required as part of any planning application.</li> </ul>
SAO4 Heritage	
<ul style="list-style-type: none"> <li>• No comments</li> </ul>	
SAO5 Travel reduction	
<ul style="list-style-type: none"> <li>• SA Objective – why do we need to “reduce the need to travel”?</li> </ul>	<ul style="list-style-type: none"> <li>• Amend SA Objective as follows: “to reduce the need to travel <u>by car</u>, encourage <u>travel by sustainable modes of transport</u> <del>modes of travel</del> <u>forms of transport</u>”</li> </ul>

	and improve travel choice”
<ul style="list-style-type: none"> <li>Reduce the need to travel (by providing services e.g. community infrastructure) <i>(under 15 but of relevance here)</i></li> </ul>	<ul style="list-style-type: none"> <li>No change. First DMC considered to reflect this point: “Encourage mixed use development and sustainable communities...”</li> </ul>
<ul style="list-style-type: none"> <li>Reduce car parking, stop car-parking in the city centre and highly accessible locations <i>(under 13 but of relevance here)</i></li> </ul>	<ul style="list-style-type: none"> <li>No change. 7<sup>th</sup> DMC considered to reflect this point: “Discourage car-ownership through car-free/low-car developments of other techniques in appropriate locations”.</li> </ul>
<ul style="list-style-type: none"> <li>Increase permeability for pedestrians and cyclists</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC as follows “<u>Increase permeability and provide other measures to encourage health-beneficial forms of transport travel including cycling and walking</u>”.</li> </ul>
<ul style="list-style-type: none"> <li>Current proposals which encourage bus use are poor. The following measures would encourage bus use e.g. signal priority, bus lanes, accessible bus stops and bus shelters</li> <li>Well designed, fit for purpose bus stops <i>(under 15 but of relevance here)</i></li> </ul>	<ul style="list-style-type: none"> <li>No change. Third DMC considered to reflect this point: “Improve public and sustainable transport infrastructure”</li> </ul>
<ul style="list-style-type: none"> <li><i>BHCC school admissions policy is at odds with the DCM “encourage the location of development close to where use of sustainable transport can be maximised”</i></li> </ul>	<ul style="list-style-type: none"> <li>General comment which is outside the remit of the SA. No change to DMC or SA objective.</li> </ul>
<ul style="list-style-type: none"> <li>Provide material incentives for people to use sustainable forms of travel</li> </ul>	<ul style="list-style-type: none"> <li>General comment which is outside the remit of the SA. No change to DMC or SA objective.</li> </ul>
SAO6 Air and Noise Quality	
<ul style="list-style-type: none"> <li>Reduce motor traffic, particularly private cars in and around the city centre and bus corridors</li> </ul>	<ul style="list-style-type: none"> <li>Amend 2<sup>nd</sup> DMC as follows: Reduce the need to travel <u>by car</u></li> </ul>
<ul style="list-style-type: none"> <li>Increasing congestion is increasing pollution but also making buses unreliable and therefore undermines one of the alternatives to the car</li> </ul>	<ul style="list-style-type: none"> <li>Add DMC as follows “<u>Reduce congestion</u>”.</li> </ul>
<ul style="list-style-type: none"> <li>Less trucks and cars will result in air pollution being minimised, however business wants more cars</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA objective.</li> </ul>

SAO7 Water quality	
<ul style="list-style-type: none"> <li>• Comment of support for this objective</li> </ul>	<ul style="list-style-type: none"> <li>• Comment noted and support welcomed</li> </ul>
<ul style="list-style-type: none"> <li>• Amend the words of DMC from “encourage” to “ensure”</li> </ul>	<ul style="list-style-type: none"> <li>• Amend DMC 3 and 5 as suggested. <u>Ensure...</u></li> </ul>
<ul style="list-style-type: none"> <li>• Under “reduce water consumption” we should insist on higher water efficiency standards than building regulations</li> </ul>	<ul style="list-style-type: none"> <li>• No change to DMC. CPP1 policy CP8 already includes the optional higher water efficiency standard target for residential development of 110l/p/day.</li> </ul>
<ul style="list-style-type: none"> <li>• We’re in an area of water stress</li> </ul>	<ul style="list-style-type: none"> <li>• No change to DMC. The last four DMC all concerned with conserving water resources.</li> </ul>
<ul style="list-style-type: none"> <li>• Add DMC on reducing marine litter</li> <li>• Add DMC on meeting and exceeding Bathing Water Directive objectives</li> </ul>	<ul style="list-style-type: none"> <li>• Add DMC as follows: “<u>Maintain high standards of bathing water quality, e.g. through timely provision of waste-water infrastructure</u>”.</li> </ul>
<ul style="list-style-type: none"> <li>• Add DMC on meeting and exceeding River Basin Management Plan objectives</li> </ul>	<ul style="list-style-type: none"> <li>• No change to DMC. All DMC broadly cover objectives of RBMP by seeking to improve quality of water and encourage sustainable use of water.</li> </ul>
<ul style="list-style-type: none"> <li>• DMC wording “Does not result in contamination of water resources” should be strengthened to ensure the water quality (groundwater) is protected and enhanced (in line with the Water Framework Directive)</li> </ul>	<ul style="list-style-type: none"> <li>• Amend DMC as follows: “Ensure remediation of land <del>does not result in contamination of</del> protects and enhances water resources.”</li> </ul>
<ul style="list-style-type: none"> <li>• SUDS techniques must be suitable if we want to protect the Groundwater Source Protection Zone</li> </ul>	<ul style="list-style-type: none"> <li>• Amend DMC as follows: “Ensure <u>appropriate</u> sustainable drainage solutions <u>are implemented, particularly in GSPZ</u>.”</li> </ul>
SAO8 flood risk	
<ul style="list-style-type: none"> <li>• The wording “considers the potential risks” should be strengthened to include “mitigates” the potential risks (<i>put under 10 but also relevant here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Add DMC (from SA objective 10) as follows: “Considers <u>and mitigates</u> the potential risks and consequences of flood risk and does not increase flood risk elsewhere”</li> </ul>
<ul style="list-style-type: none"> <li>• Permeable infrastructure needs to be embedded</li> </ul>	<ul style="list-style-type: none"> <li>• Permeable infrastructure is a type of SUDS. No change to DMC.</li> </ul>



	Existing DMC covers this issue.
<ul style="list-style-type: none"> <li>SUDS techniques must be suitable if we want to protect the Groundwater Source Protection Zone (from SA ob 7 but also of relevance here)</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC as follows: “Incorporates <u>appropriate</u> sustainable drainage <del>techniques</del> <u>solutions</u>, <u>particularly in GSPZ</u>.”</li> </ul>
<ul style="list-style-type: none"> <li>Need for further guidance on reducing flood risk</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA objective.</li> </ul>
SAO9 Greenhouse gas reduction	
<ul style="list-style-type: none"> <li>Ensure all new developments are carbon neutral, energy efficient fabric construction and use energy efficiency technology (<i>under 14 but of relevance here</i>)</li> <li>Low energy fabric for all new housing development (<i>under 14 but of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>No change. Existing DMC cover these issues.</li> </ul>
<ul style="list-style-type: none"> <li>BHCC needs a community energy strategy</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA Objective.</li> </ul>
<ul style="list-style-type: none"> <li>Need to enforce renewable energy generation through planning consents</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA Objective.</li> </ul>
SAO10 Adapt to climate change	
<ul style="list-style-type: none"> <li>The wording “considers the potential risks” should be strengthened to include “mitigates” the potential risks</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC as follows: “Considers <u>and mitigates</u> the potential risks and consequences of flood risk and does not increase flood risk elsewhere”</li> </ul>
<ul style="list-style-type: none"> <li>Add “contributes to BHCC Carbon Reduction strategy”</li> </ul>	<ul style="list-style-type: none"> <li>Of greater relevance to SA objective 9. DMC already included under SA Objective 9 are all examples of measures that will help to reduce carbon emissions generated by energy. Measures to reduce transport related carbon emissions covered by DMC under SA Objective 5. Measures to support growth of low carbon economy covered by DMC under SA Objective 19. No change to DMC.</li> </ul>
<ul style="list-style-type: none"> <li>Legal duty to have a mitigation and adaptation strategy</li> </ul>	<ul style="list-style-type: none"> <li>BHCC Climate Change Strategy 2011-2015 and Sustainability Action Plan covers this issue. General comment. SA objectives cover the issues of climate change mitigation and adaptation. No change to</li> </ul>

	DMC or SA Objective.
<ul style="list-style-type: none"> <li>Need to require a maintenance budget for all development to ensure long term costs of up-keeping sustainable infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA objective.</li> </ul>
<ul style="list-style-type: none"> <li>Include DMC regarding reducing demand for water and increasing water efficiency under this objective</li> </ul>	<ul style="list-style-type: none"> <li>Add DMC as follows: Encourage sustainable use of water.</li> </ul>
SAO11 Soil Quality	
<ul style="list-style-type: none"> <li>No comments</li> </ul>	
SAO12 Waste	
<ul style="list-style-type: none"> <li>How do we measure/report waste prevented or reused?</li> </ul>	<ul style="list-style-type: none"> <li>Prevention of waste is difficult to measure. Waste re-use is monitored and reported in the Authority Monitoring Report, although may not be fully representative. General comment. No change to DMC or SA Objective.</li> </ul>
<ul style="list-style-type: none"> <li>Ensure development has integrated infrastructure –e.g. for food waste recycling</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC 2 as follows: Facilitate improved accessibility to recycling and other waste management facilities, <u>including composting.</u></li> </ul>
<ul style="list-style-type: none"> <li>Considers scope and a place for re-use within development</li> </ul>	<ul style="list-style-type: none"> <li>No change. Existing DMC 4 promotes re-use.</li> </ul>
SAO13 Best use of land	
<ul style="list-style-type: none"> <li>Reduce car parking, stop car-parking in the city centre and highly accessible locations</li> </ul>	<ul style="list-style-type: none"> <li>Add DMC as follows: <u>Encourage low-car/car-free developments in accessible locations.</u></li> </ul>
<ul style="list-style-type: none"> <li>All land should have a clear designation to gain community support and sense of identity</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA objective.</li> </ul>
SAO14 Housing	
<ul style="list-style-type: none"> <li>Ensure all new developments are carbon neutral, energy efficient fabric construction and use energy efficiency technology</li> <li>Low energy fabric for all new housing development</li> </ul>	<ul style="list-style-type: none"> <li>No change. Existing DMC cover these issues and applies to all types of development.</li> </ul>
<ul style="list-style-type: none"> <li>Do we need to re-examine wording around “affordable”</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA Objective. The definition of Affordable Housing is set by national policy.</li> </ul>

<ul style="list-style-type: none"> <li>Is there potential for new SPD on food growing on new housing development that has more detail than the PAN?</li> </ul>	<ul style="list-style-type: none"> <li>General comment. No change to DMC or SA Objective. Existing PAN considered to provide adequate guidance.</li> </ul>
SAO15 Access to services	
<ul style="list-style-type: none"> <li>Add new DMC – improve access to all facilities/service by sustainable transport (<i>under 16 but of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC 3 as follows: Improve access to local <u>facilities and services by sustainable transport</u></li> </ul>
<ul style="list-style-type: none"> <li>Well designed, fit for purpose bus stops</li> </ul>	<ul style="list-style-type: none"> <li>No change. Covered by revised DMC 3.</li> </ul>
<ul style="list-style-type: none"> <li>Build local community support and engagement</li> </ul>	<ul style="list-style-type: none"> <li>This considered to be more relevant to SA objective 16 – Health and Well-being.</li> </ul>
<ul style="list-style-type: none"> <li>Reduce the need to travel</li> </ul>	<ul style="list-style-type: none"> <li>No change to DMC. Reducing the need to travel is an outcome that will be achieved through this SA objective and links to all existing DMC within this SA Objective.</li> </ul>
<ul style="list-style-type: none"> <li>Importance of maintaining local parades; e.g. not allowing 2 shops to be knocked through into a tesco express (<i>put under 19 but also of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>No change to DMC. This issue considered to be covered by existing DMC 2: Ensure the vitality of town, district and local centres.</li> </ul>
<ul style="list-style-type: none"> <li>Access to healthy affordable food (<i>put under 19 but also of relevance here</i>)</li> </ul>	<ul style="list-style-type: none"> <li>Amend DMC 1 as follows: Increase provision of <u>and access to</u> key local services and facilities, such as health, education, cultural, recreation, community and retail, <u>including food</u>.</li> </ul>
SAO16 Health & wellbeing	
<ul style="list-style-type: none"> <li>Recognise the health benefits of gardening and food growing as a core activity</li> <li>Links to community food growing space and allotments – have proven benefits of improved mental health</li> </ul>	<ul style="list-style-type: none"> <li>Delete and replace DMC 2 as follows: <del>Improve access to open space, the countryside, the seafront and other opportunities for physical activity.</del> <u>Facilitate opportunities that promote physical activity and supports mental well-being, e.g. through access to various types of open space.</u></li> </ul>
<ul style="list-style-type: none"> <li>Add new DMC – improve access to all facilities/service by sustainable transport</li> </ul>	<ul style="list-style-type: none"> <li>No change to DMC for this objective, however DMC for SA 15 amended as follows: Improve access to local <u>facilities and services by sustainable transport</u></li> </ul>
<ul style="list-style-type: none"> <li>Build local community support and engagement (under SA Objective</li> </ul>	<ul style="list-style-type: none"> <li>Add new DMC as follows: <u>Encourage the development of mixed and</u></li> </ul>

15 but of relevance here)	<u>balanced communities with opportunities for community interaction.</u>
SAO17 Community Safety	
<ul style="list-style-type: none"> <li>DMC add – encourage a sense of positive commitment to valuing the local environment</li> </ul>	<ul style="list-style-type: none"> <li>Add new DMC as follows: <u>Encourage communities to value the local environment</u></li> </ul>
SAO18 Equality and Social Inclusion	
<ul style="list-style-type: none"> <li>No comments</li> </ul>	
SAO19 Economy and employment	
<ul style="list-style-type: none"> <li>Importance of maintaining local parades; e.g. not allowing 2 shops to be knocked through into a tesco express</li> </ul>	<ul style="list-style-type: none"> <li>No change to DMC. This issue considered to be covered by existing DMC 2 of SA objective 15: Ensure the vitality of town, district and local centres.</li> </ul>
<ul style="list-style-type: none"> <li>Access to healthy affordable food</li> </ul>	<ul style="list-style-type: none"> <li>This has been covered under SA objective 15 by amending the DMC as follows: Increase provision of <u>and access to</u> key local services and facilities, such as health, education, cultural, recreation, community and retail, <u>including food.</u></li> </ul>
<ul style="list-style-type: none"> <li>The conversion of industrial areas, with easy access to bus services, into housing will force people to drive to work in outlying areas (Rayner, Sackville Ind Est)</li> </ul>	<ul style="list-style-type: none"> <li>Protection of primary industrial estates provided by CPP1 policy CP3. Add new DMC to cover access issues as follows: <u>Facilitate access to employment by sustainable transport.</u></li> </ul>

## Appendix D Options Assessments

*It should be noted that where there is no anticipated impact for all options on a particular SA objective, the SA objective has not been included within the appraisal table.*

### Housing, Accommodation and Community

#### CPP2 Options Appraisal: DM1 Housing Quality, Choice and Mix

##### Options Appraisal

- Option 1) No specific policy but rely on the NPPF
- Option 2) Have individual policies in CPP2 covering the following separately: Housing Quality – addressing standards; Housing Choice; Housing Mix
- Option 3) Have a single policy in CPP2 covering housing quality, choice and mix

##### Assumptions

- Assume that housing development impacts are all addressed by other policy (e.g. impacts on biodiversity, flood risk etc) and therefore these objectives have been assessed as having no impacts.
- Assume that technical standards on space, access and adaptability will be the same in both options 2 and 3.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
13. To make the best use of land available	+	This option may result in smaller housing being delivered, as housing won't be required to meet any space standards, which could help to make more efficient use of land available. Overall, impacts should be positive.	-	This option may result in larger housing units being delivered, as housing is required to meet certain space standards. This may use more land per unit, and may be less efficient than if space standards were not applied. Impacts could be adverse.	-	Impacts considered to be the same as option 2.
14. To provide housing, including	-/+	Although this option requires the delivery of a mix of housing based on	++	This option will allow for the inclusion of nationally described	++	This option will also allow for the inclusion of nationally described

affordable housing, to contribute towards meeting local needs		local trends and needs, having positive impacts on this objective, it does not provide any policy with regards to technical standards. Therefore housing delivered under this option would not be required to meet any space or accessibility standards, which could result in delivery of lower quality housing. This option could result in smaller units however, which may be less expensive than those which have met requirements for space standards. Overall impacts considered to be mixed.		space standards for new development to be included within the policy, as well as the standards on access and accessibility. Inclusion of these standards will help to ensure that high quality housing is delivered. In addition, this option will enable greater detail to be included on the local requirements with regards to housing mix and housing choice, and for this to be based on evidence-based need. Impacts should be significantly positive.		space standards as well as the standards on access and accessibility. This is unlikely to be any different to option 2. This option will also allow the local requirements regarding mix and choice to be included. Impacts are considered to be significantly positive and are unlikely to differ from option 2, although may result in a more lengthy policy.
16. To improve health and well-being, and reduce inequalities in health	-/+	Inadequate housing can have a detrimental effect on health. This includes, for example, through overcrowding or housing that does not meet people's needs. Although this option will result in delivery of housing, having positive impacts, housing could be smaller and inadequate, which could have a detrimental impact on health. Overall impacts are mixed.	++	This option will allow for the inclusion of nationally described space and access standards. This should ensure that housing delivered is of a minimum size and standard and should therefore have a positive impact on health. This option will also enable greater detail to be included on the local requirements with regards to housing mix and housing choice, and for this to be based on evidence-based need. Overall impacts should be significantly positive.	++	This option will also allow for the inclusion of nationally described space standards as well as the standards on access and accessibility. This is unlikely to be any different to option 2 and should have benefits for health through provision of quality housing. This option will also allow the local requirements regarding mix and choice to be included. Impacts are considered to be significantly positive and are unlikely to differ from option 2, although may result in a more lengthy policy.
18. To increase equality and social inclusion	-	This option would not allow for the application of the optional accessible and adaptable standards. This could	+	This option will allow for the inclusion of the standards on access and adaptability. This	+	Impacts considered to be the same as option 2.

		have adverse impacts on this objective, as may mean the needs of disabled people are not met, particularly those who use a wheelchair.		should have positive impacts on this objective as will help to meet the needs of disabled people, particular those that make use of a wheelchair.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	This option would provide no additional policy guidance and is therefore considered to be the most flexible and less restrictive approach. This may help to bring forward housing applications, which would benefit economic activity. However this option provides little certainty for applicants, and this may inhibit applications. Overall impacts should be positive.	+	This option would provide certainty for applicants, which may help to bring forward applications, however could be considered to be less flexible and more restrictive, which may inhibit applications. Overall impacts should be positive.	+	Impacts considered to be the same as option 2.

## Summary

### Option 1 – NPPF only

- This option was found to have positive impacts on the objectives for making the best use of land and economic development. This option may result in smaller units which use land more efficiently. This option is considered to be the more flexible approach which may help to bring forward applications and benefit economic development.
- This option was found to have mixed (adverse/positive) impacts on the objectives for housing and health. Although housing would be delivered with this option, it may be of lower quality and standard as no space or access/adaptability standards would be applied.
- This option was found to have adverse impacts on the objective for equalities. This option would not enable the access and adaptability standards to be applied and may result in a lack of housing being delivered which meets the needs of people using wheelchairs, in particular.

### Option 2 – Separate policies

- This option was found to have significant positive impacts on the objectives for housing and health. This option should result in delivery of high quality housing that meets a variety of needs, enabling people’s housing needs to be met.

- This option was found to have positive impacts on the objectives for equalities and economic development. This option will enable the standards on access/adaptability to be applied, which should be of particular benefit to disabled people, or those using a wheelchair. Although this option was considered to be more restrictive in terms of policy requirements, it provides clarity to applicants which should help to bring forward applications.
- This option was found to have adverse impacts on making the best use of land. This option would apply space standards which would result in larger units than option 1, would use more land per unit and may not be the most efficient use of land in the city.

### Option 3 – combined policies

- Impacts the same as option 2.

### Preferred Option

Either options 2 or 3 are the preferred option, with there being little difference between the two options. This is mainly based on the assumption that the technical standards applied will be exactly the same in either approach. Both options have potential for significant positive impacts on the objectives for housing and health, with these options helping to deliver good quality of homes that meet a variety of housing needs, and also positive for equalities, as should ensure that the housing and space needs of people with certain protected characteristics are met. The positive benefits associated with these options are considered to outweigh the potential for adverse impacts relating to making the best use of land.

### CPP2 Options Appraisal – DM1 Private outdoor amenity space in residential development

#### Options:

1. Policy to require the provision of useable private outdoor amenity space in new residential development.
2. Policy setting out more detailed specifications for private outdoor amenity space. This would include minimum space standards for types of outdoor private amenity space by the type of residential development and/or the number of bedrooms/number of persons occupying residential unit.

#### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in	+?	This option could have a positive impact on this objective, as private amenity space could be used to provide opportunities to achieve net	+?	Same as option 1.



biodiversity		gains in biodiversity. However this would depend on implementation by homeowner.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+?	This option is concerned with ensuring housing includes some provision of outdoor amenity space which will help contribute towards delivery of quality housing. The option does not define a minimum space standard to be achieved but instead will include justification to guide the appropriate amount and type of space provided. This option should result in a positive impact on this objective however without a minimum standard there is a risk that amenity space is delivered which may not meet inhabitants' needs. Impact therefore also considered uncertain.	+	This option is also concerned with ensuring housing includes some provision of outdoor amenity space which will contribute towards delivery of quality housing. This option will include detailed specifications, including minimum standards for a range of different housing types and/or sizes (e.g. number of bedrooms). This option should result in a positive impact on this objective and should ensure that people are provided with a decent amount and type of amenity space according to their needs.
16. To improve health and well-being, and reduce inequalities in health	+	The provision of outdoor amenity space is considered to have a positive impact on health and well-being.	+	As with option 1, provision of outdoor amenity space is considered to have a positive impact on health and well-being.
18. To increase equality and social inclusion	+?	This option could have an indirect positive impact on this objective as could help to ensure that the amenity space is suitable for the intended occupier. This could include, for example, ensuring the needs of disabled people are met. However, this will depend on whether the reasoned justification includes guidance on this matter and is therefore uncertain.	+?	This option could have an indirect positive impact on this objective in a similar way to option 1. However, this will depend on the detailed specifications included in the policy and is therefore uncertain.
19. To contribute towards the growth of a sustainable and diverse economy, increase	+	This option should help ensure there is some flexibility and will allow the market to design the space. A more flexible policy approach may help with bringing forward development and should therefore have a positive impact on this	+?	A detailed policy with specific requirements will bring clarity to developers with regards to what will be found acceptable, however this approach may stifle design and may be found to restrict development from coming forward.

employment opportunities and meet local needs		objective, although may bring some uncertainty to developers with regards to what will be acceptable.		
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## Summary

### Option 1

- There are no objectives where this option has an adverse impact.
- As with option 2, this option has potential for positive impact on biodiversity, as outdoor amenity space could provide space for biodiversity, although this would be dependent on implementation by the homeowner.
- This option has potential to have a positive impact on the housing objective as should help to deliver private amenity space which will help contribute towards delivering quality housing. However, the impact is also considered to be uncertain due to not having a minimum standard and is more uncertain than option 2 on this objective because of this.
- As with option 2, this option has the potential for positive impact on equalities as a criteria-based policy should ensure the amenity space is suitable for the intended homeowner, which could include those with protected characteristics. However this would be dependent on the inclusion of guidance that required this.
- As with option 2, this option has the potential for positive impact on health as access to amenity space will be beneficial for health and well-being.
- This option has potential to have a positive impact on economic development, as a flexible policy approach could help to bring development forward.

### Option 2

- There are no objectives where this option has an adverse impact.
- As with option 1, this option has potential for positive impact on biodiversity, dependent on implementation by the homeowner.
- This option has the potential to have a positive impact on the housing objective as should help to deliver a specific standard of private amenity space which will help contribute towards delivering quality housing. The impacts on this objective are more certain due to standards being specified.
- As with option 1, this option has the potential for positive impact on equalities as should ensure the amenity space is suitable for the intended homeowner. However this would be dependent on the inclusion of detailed specification that required this.
- As with option 1, this option has the potential for positive impact on health.
- This option has the potential to have a positive impact on economic development, as specific policy requirements would bring certainty to developers regarding what is acceptable. However this option may be too restrictive and prevent development from coming forward, making it more uncertain.

### Preferred Option

- Neither option had any potential for adverse impact and there are some uncertainties with both options. Both will result in private outdoor amenity space although there is more uncertainty with regards to the quantity/quality that would be delivered with option 1. However, option 2 could be inflexible and may restrict development.
- Option 1 is considered to be the more flexible and less restrictive approach and this may help bring development forward, having benefits for economic development as well as housing delivery. To have a positive impact for equalities, guidance should include consideration of meeting needs of people with protected characteristics, e.g. those of disabled people.

### CPP2 Options Appraisal DM2 Retaining housing – resisting the net loss of residential accommodation

#### Options:

1. Having no specific policy in CPP2
2. Set out an ‘in principle’ general DM type policy that seeks to avoid a net loss of housing but provides for appropriate exceptions through criteria

#### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
4. To protect and conserve the city’s historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+?	Not having a policy in place could allow the adaptation of heritage assets more easily, e.g. an empty house which is also listed building into an alternative use and could therefore lead to preservation of the asset.	-/+?	This option could have adverse impacts on this objective. E.g. it could prevent the change of use from residential uses e.g. within a listed building, into alternative uses which may support the preservation of the asset. This option could have a positive impact on this objective if the policy included criteria that allowed loss where the loss would lead to preservation of a heritage asset.
13. To make the best use of land available	-/+	This option is considered to have mixed impacts. A lack of policy could result in housing being lost and replaced by alternative uses, which may not make the best use of the land available considering the significant need for housing	-/+	This option is considered to have mixed impacts. It could have adverse impacts on this objective as may prevent vacant/derelict housing being redeveloped and brought back into use as an alternative use which may make better use of a site. It could also prevent better use of housing stock being made, e.g. conversion

		locally. However, it could result in adaptive re-use, for example, of vacant/derelict housing to an alternative use which is more appropriate for the location, and this would have a positive impact on making the best use of the land available. It could also allow better use of existing housing stock, e.g. 2 flats being converted into a family home, for which there is also a need locally.		of 2 sub-standard flats into 1 home, however criteria could address this issue. However, considering the significant need for housing locally, a policy that protects and retains the existing stock as housing could be regarded as having a positive impact on this objective.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	-	This option is considered to have an adverse impact on this objective. There is a significant housing need locally and not having a policy to resist the loss of housing could potentially lead to reductions in certain types of housing stock unless certain types of housing had protection through other policy. However, these impacts may be mitigated by current PD rights which allow change of use from certain uses to housing.	++	There is a significant need for all types of housing locally. This option is considered to have a significant positive impact on this objective. Resisting the loss of housing, except in certain prescribed circumstances, will help to retain existing housing stock. Criteria which allowed sub-standard housing to be lost could help to improve the overall standard of existing housing in the city.
16. To improve health and well-being, and reduce inequalities in health	-	Access to housing is one of the wider determinants of health. This option may result in loss of housing stock, for which there is a significant need locally. This could have an adverse impact on health.	+	This option should lead to the retention of housing. Housing is one of the wider determinants of health, and therefore this option could have a positive impact on health.
18. To increase equality and social inclusion	-	There is a need for various types of housing locally. This option may lead to the loss of specialist types of housing e.g. housing for older people, disabled people or supported housing, unless these types were protected by other policy. This option could therefore have adverse impacts on this objective.	+	There is a need for various types of housing in Brighton & Hove, including housing for people with protected characteristics, such as older and disabled people. A policy which restricts the loss of housing, including specialist types of housing could therefore have positive impacts on this objective as would be one way in helping to ensure people's specific housing needs are met.
19. To contribute towards the growth	+?	This option could facilitate change of use, e.g. from residential to employment. This would help	-?	This option would resist the loss of land in residential uses, and would therefore prevent the change of use from residential to

of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.		to increase the supply of land available for employment uses and have a positive impact on this objective. However this is also fairly uncertain and would depend on implementation and as employment land is generally of lower value than land in residential uses, it is also fairly uncertain of whether this would actually happen in practice.		other uses, e.g. employment. This could have adverse impacts on this objective, however is fairly uncertain as it is not known whether this would actually happen in practice due to residential land values.
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### Option 1 – no policy

- This option has potential for positive impact on the historic built environment, as a flexible approach to loss may enable adaptive re-use of a heritage asset which could lead to its preservation.
- This option has potential for positive impact on economic development, as could facilitate change of use from residential to employment uses, helping to increase the supply of land in employment uses.
- This option has potential to have a mixed impact on making the best use of land, as could allow for adaptive re-use of derelict/vacant housing that may not otherwise be brought back into active use. However, given the significant need for housing locally, it could be questioned whether allowing the loss of housing to other uses is making the best use of land.
- This option has potential to have an adverse impact on housing, as could lead to a loss in housing stock for which there is a significant local need. However, this may be mitigated by the fact that Permitted Development rights allow change of other uses to residential.
- This option has potential to have an adverse impact on health, as access to housing is one of the wider determinant of health.
- This option has potential to have an adverse impact on equalities, as could lead to a loss in specialist housing which meets the need of people with protected characteristics, e.g. older people.

### Option 2 – criteria based policy

- This option has potential to have a significant positive impact on housing, as would help protect against the loss of housing stock for which there is a significant local need.
- This option has potential to have a positive impact on health, as access to housing is one of the wider determinant of health and this option would help to retain housing stock.
- This option has potential to have a positive impact on equalities, as could help to retain specialist housing which meets the need of people with protected characteristics

- This option has potential for mixed impacts on heritage, as restriction of loss/change of use could result in vacancy and neglect of historic buildings that could otherwise be brought into use. Positive impacts would rely on this option including criteria that allows the loss in certain cases, e.g. preservation of a heritage asset.
- This option also has potential to have a mixed impact on making the best use of land. It would retain housing stock, for which there is a significant need locally, however may prevent the adaptive re-use of derelict/vacant housing that may otherwise be brought back into active use if change of use were permitted.
- This option has potential for adverse impact on economic development, as it may prevent the change of use from residential to employment uses, although this is fairly uncertain as it is unknown whether this would happen in practice.

#### **Preferred Option**

- Overall option 2 had greater potential for positive impacts than option 1, particularly on the most relevant and key objectives to this policy area, housing. Given the significant need for housing locally, a policy that helps retain housing in housing uses would have a significant positive effect and would have associated positive effects on health and equalities.
- The potential for adverse effects resulting from option 2 on economic development could be mitigated by employment site allocations policies and other policies which support employment-based development; the potential for adverse impacts on heritage assets and making the best use of land could be mitigated through criteria which allowed loss in certain circumstances.
- Option 2 is considered to be the preferred approach.

### **CPP2 Options Appraisal: DM3 Residential Conversions and the retention of smaller dwellings**

#### **Options:**

- Option 1) No policy in City Plan.
- Option 2) Criteria based policy to assess residential conversions and the retention of smaller dwellings.
- Option 3) Incorporate issues regarding residential conversions into other policies, namely that which refer to National Space Standards (Housing Quality, Choice and Mix)

#### **Assumptions:**

- Policy will apply to existing dwellings only therefore can assume that any potential for site based issues will have been previously assessed at the time of the original development and found acceptable.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	<p>Converting one residential unit into two or more units could help to reduce the pressure to build elsewhere in the city, including on open space, having positive impacts for this objective.</p> <p>However conversions may increase pressure on existing open space, having adverse impacts on this objective, particularly if a high proportion of conversions took place in the same area, and would be likely to result in at least one of the newly created units not having any access to outdoor private amenity space, (e.g. a self-contained flat created out of the top-floor of a 3-story house.)</p>	-/+	<p>Impacts considered to be the same as option 1 (and 3). This option may provide the opportunity for the consideration of issues relating to open space, e.g. if the conversion is taking place in areas of open space deficiency.</p>	-/+	<p>Impacts considered to be the same as options 1 and 2.</p>
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	?	<p>Conversion of a listed building into 2 or more dwellings may harm the special character of the building however this will need separate listed building consent which should address this.</p> <p>Conversion of a dwelling within a Conservation Area may harm the character of the Conservation Area although it is considered unlikely that largely internal alterations would have any affect.</p>	?	<p>A criteria based policy may help to avoid an adverse impact on heritage assets and could result in a positive impact through the consideration of how the heritage asset could be protected or conserved during the conversion. However, this would depend on the policy including consideration of issues regarding heritage assets and townscape. As listed building consent would be required for listed buildings, it is not known whether there would be any additional need for further policy</p>	?	<p>Impacts likely to be similar to option 2. Other more general policy could provide the opportunity for the consideration of heritage assets, however is unknown and therefore uncertain.</p>

				regarding listed buildings. Impacts therefore uncertain as contents of policy is unknown.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	The conversion of one dwelling into 2 or more may result in an increase in cars in the vicinity having adverse impacts on this objective.	?	A criteria based policy may help to avoid an adverse impact on this objective and could result in a positive impact through the consideration of transport impacts or promotion of sustainable transport options. Impacts uncertain as contents of policy are unknown.	?	Impacts considered to be similar to option 2. Other more general policy could provide the opportunity for the consideration of transport impacts, however is unknown and therefore uncertain.
6. To improve air and noise quality	-	It is considered unlikely that residential conversions will result in air quality issues. However conversions may generate additional noise, which could impact upon those adjacent and within the building.	?	A criteria based policy may help to avoid an adverse impact on this objective and could result in a more neutral impact through the consideration of noise impacts. Impacts uncertain as contents of policy are unknown.	?	Impacts considered to be similar to option 2. Other more general policy could provide the opportunity for the consideration of noise impacts, however is unknown and therefore uncertain.
7. To improve water quality (ecological, chemical and quantity status)	-/+	Residential conversions will result in an increase in water consumption when compared to the original development (e.g. 2 units compared to 1). However, also provides the opportunity to install measures which improve water efficiency. Impacts therefore considered to be mixed.	-/+	It is considered unlikely that a criteria based policy will include policy relating to improving water efficiency as this is already addressed in adopted CPP1 policy. Impacts the same as option 1.	-/+	It is considered unlikely that other more general policy would include policy relating to water efficiency as this is already addressed in adopted CPP1 policy.
9. To reduce emissions of greenhouse gases that cause climate change	-/+	Residential conversions will result in an increase in energy consumption when compared to the original development/unit. However, also provides the opportunity to install	-/+	It is considered unlikely that a criteria based policy will include policy relating to improving energy efficiency as this is already addressed in adopted CPP1 policy.	-/+	It is considered unlikely that other more general policy would include policy relating to energy efficiency as this is already addressed in adopted CPP1 policy.



		measures which improve energy efficiency. Impacts therefore considered to be mixed.		Impacts the same as option 1.		
12. To minimise and sustainably manage waste	-	Residential conversions will result in an increase in waste generated when compared to the original development/unit. Conversions will also result in additional space required for waste storage. Impacts considered to be negative.	-?	Although this policy is limited in what it can achieve in terms of generation of waste, it could facilitate access to recycling or waste management if the policy included consideration of waste storage and therefore although impacts are still considered to be adverse, they are also uncertain until the contents of the policy are known.	-?	Impacts considered to be similar to option 2. Other more general policy could provide the opportunity for the consideration of waste storage, however is unknown and therefore uncertain.
13. To make the best use of land available	+	Converting 1 residential unit into 2 or more dwellings can help to make the best use of the existing building stock and therefore has a positive impact on this objective. Residential conversions would still come forward without a policy in place, however provides less certainty for developers with regards to when they will be acceptable which may inhibit applications.	++	This option would provide greater certainty to applicants and may help to bring forward applications which are acceptable. This would have a significant positive impact on this objective as would help to make the best use of the land and building stock and increase land use efficiency.	+	Residential conversions would still come forward without a policy in place, however this approach may provide less certainty for developers with regards to when they will be acceptable and therefore may not make the best use of land/building stock available.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	Residential conversions would still come forward without a policy in place, however provides less certainty for developers with regards to when they will be acceptable which may impact on the amount of applications. Additionally, with no policy in place,	++	This option would provide greater certainty to applicants and may help to bring forward applications which are acceptable. This would have a significant positive impact on this objective as would help to increase housing stock. The option also refers to the	+	Residential conversions would still come forward without a policy in place, however this approach may provide less certainty for developers with regards to when they will be acceptable and may not provide the detail required to protect and retain smaller units.

		lower quality conversions may come forward and may result in loss of smaller dwellings if there is no policy in place to retain those below a certain size impacting on the mix of sizes of dwellings in the city.		retention of smaller dwellings and therefore is likely to include criteria which prevents the loss of units below a certain size, and this would help to prevent smaller dwellings being converted and maintain stock of this type of smaller dwelling, helping to maintain a mixture of sizes of dwellings in the city.		
Summary	All options are likely to have positive impacts on this objective as conversions will come forward regardless of which option is pursued. However a dedicated criteria based policy will provide certainty for applicants and may help to bring forward residential conversions which are an important source of housing in the city, whilst retaining and protecting smaller sized dwellings. The quality of the dwellings may also be positively influenced by a criteria based policy.					
16. To improve health and well-being, and reduce inequalities in health	+	Housing is one of the determinants of health. Residential conversions will continue to come forward without a policy having a positive impact on this objective. However, this option may result in those of lower quality coming forward. Residential conversions could have an adverse effect on residential amenity, e.g. through increased noise, vehicle movements etc, and a lack of policy may miss the opportunity to address these issues.	++	This option should provide clear guidance and help to bring forward quality conversions that are considered acceptable against a range of issues. This option should help to increase housing stock, whilst protecting certain sized dwellings, helping to maintain a mix of sizes of dwellings in the city. This option could also include consideration of issues which could impact upon residential amenity. Impacts considered to be significantly positive.	+	Residential conversions would still come forward without a policy in place, however this approach may provide less certainty for developers with regards to when they will be acceptable, and may miss the opportunity to address residential amenity impacts of relevance to conversions.

**Summary**

**Option 1**

- There are 3 objectives where this option had the potential for positive impacts: making the best use of land, housing and health. Conversions will still come forward with this option helping to make the best use of land available, increasing housing provision and impacting positively on health, however this option provides no clarity for applicants and may inhibit applications and therefore the significance of the impact.
- There are 3 objectives where this option had the potential for mixed positive and adverse impacts: open space, water quality and greenhouse gas emissions. Conversions could increase pressure on open space through increased population, and will increase water and energy consumption; however may reduce the need to build on open space and provides the opportunity to improve water and energy efficiency.
- There are 4 objectives where this option had the potential for adverse impact: historic built environment, travel, air/noise pollution and waste. Conversions could have adverse impacts on heritage assets, could increase car ownership in a locality, could have adverse noise impacts and will increase waste. Lack of policy may miss the opportunity to address these issues in relation to conversions.

## Option 2

- There are 3 objectives where this option had the potential for positive impacts, with impacts considered to be significantly positive: making the best use of land, housing and health. A criteria-based policy may help to bring forward more acceptable applications, increasing housing provision and increasing land use efficiency, whilst retaining and protecting smaller sized dwellings, helping to maintain an appropriate mix of dwelling sizes. The quality of the dwellings may also be positively influenced by this option and this option may also provide the opportunity for any residential amenity impacts to be addressed, which will impact on health as does the provision of housing itself.
- There are 3 objectives where this option had the potential for mixed positive and adverse impacts: open space, water quality and greenhouse gas emissions. As described under option 1, conversions could increase pressure on open space through increased population, and will increase water and energy consumption; however may reduce the need to build on open space and provides the opportunity to improve water and energy efficiency.
- There are 3 objectives where this option had the potential for uncertain impact and will depend on the content of the policy: historic built environment, travel and air/noise pollution. As described under option 1, conversions could have had adverse impacts on these objectives however a criteria based policy provides the opportunity for these issues to be considered and addressed, and therefore impacts is considered to be uncertain.
- There is 1 objective where this option had the potential for adverse uncertain impact: waste. Conversions are likely to increase waste (when compared to the original dwelling), however a criteria-based policy may provide the opportunity for issues around waste to be considered, e.g. storage, although will not reduce waste.

## Option 3

- This option also had positive impacts on 3 objectives: making the best use of land, housing and health. However, impacts were not considered to be significantly positive and therefore more reflective of option 1. Although conversions will still come forward with this option, not having a criteria-based policy for this issue may result in less applications due to lack of certainty.
- As with options 1 and 2, this option had potential for mixed positive and adverse impacts on 3 objectives: open space, water quality and greenhouse gas emissions.

- As with option 2, this option had potential for uncertain impact on 3 objectives: historic built environment, travel and air/noise pollution. Conversions could have adverse impacts on these objectives however these issues could be considered and addressed in other policies, depending on their content and therefore the impact is considered uncertain.
- As with option 2, there is 1 objective where this option had the potential for adverse uncertain impact: waste. Conversions are likely to increase waste (when compared to the original dwelling), however this issue could be considered and addressed in other policies, depending on their content.

### **Preferred Option**

- Option 2 is considered to have greater potential for more significant positive impact on the key objective for this policy area: provision of housing. A criteria based policy should provide greater certainty for applicants, may help to bring forward applications and should help to increase housing provision. This option should also help to retain a good mix of sizes of dwellings through the protection of smaller dwellings.
- Option 2 is also considered to have greater potential for more significant positive impact on making the best use of land available, as will increase land use efficiency and make better use of existing building stock; and on health, with housing being one of the determinants of health as well as potentially influencing the quality of housing delivered and providing the opportunity to consider impacts on residential amenity.
- There were a number of objectives where option 2 had an uncertain impact, and this will depend on the content of the policy addressing certain issues. Impacts could be positive if the policy addressed issues relating to the historic built environment, travel choice/transport, and noise, and adverse impacts on waste could be minimised if waste management is considered.

### **CPP2 Options Appraisal: DM4 and DM5 Older Persons Housing and Specialist Housing**

#### **Options Appraisal**

- Option 1) No specific policy but rely on NPPF (para 50)
- Option 2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing
- Option 3) Have a single policy in CPP2 covering older persons and specialist housing

#### **Assumptions**

- Assume that housing development impacts are all addressed by other policy (e.g. impacts on biodiversity, flood risk etc) and therefore these objectives have been assessed as having no impacts.
- Specialist housing not defined however assume that this could include housing for disabled people, homeless people, families, smaller households, and so on.

<b>SA Objective</b>	<b>1</b>	<b>Summary of Effects</b>	<b>2</b>	<b>Summary of Effects</b>	<b>3</b>	<b>Summary of Effects</b>
13. To make the best use of land available	+	Land is severely constrained within the city, and therefore it is imperative to make the best use of land available. Providing a wide range of housing to meet local needs could help to a make the best use of land available and therefore this option may have an indirect positive impact on this objective.	+	Impacts considered to be similar to option 1 and may result in indirect positive impacts for this objective.	+	Impacts considered to be similar to options 1 and 2 and may result in indirect positive impacts for this objective.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	NPPF para 50 requires the delivery of a wide choice of homes based on trends and local needs such as e.g. families, older people, disabled people, service families and people wishing to self-build. This should result in positive impacts on this objective however does not provide any further policy guidance on delivery housing for older people or people with specialists needs.	++	It is unknown which groups of people would be included within “specialist housing” but this could include for example, homeless people, disabled people, people with special needs, families and smaller households. This option would provide clear policy guidance on the specific needs and considerations of older people and of people with specialist housing needs, which in itself, could include a wide range of requirements. Impacts should be significantly positive.	+	This option would result in the delivery of housing for older people and for those with specialists needs. Although the impacts would be positive, this may result in a lengthy policy, or a policy that does not adequately address the individual housing needs of these groups of people.
16. To improve health and well-being, and reduce inequalities in health	+	This option should result in the delivery of a choice of homes, which will have positive impacts on health, as housing is one of the wider determinants of health.	++	Housing is one of the wide determinants of health. Housing that meets an individual’s specific needs will contribute significantly towards their health. This option should result in clear policy with regards to meeting varying needs	+	This option would result in the delivery of housing for older people and for those with specialist needs, which would impact positively on health. Although the impacts would be positive, this may result in a lengthy policy, or a policy that does not

				and should therefore have significant positive impacts on this objective.		adequately address the individual needs of these groups of people.
18. To increase equality and social inclusion	+	This option should result in delivery of a wide choice of homes, including those for people with protected characteristics, e.g. older and disabled people, resulting in positive impacts overall. However lack of any further policy may mean their specific needs are not met.	++	This option should advance the opportunity for equalities through the specific consideration of the needs of certain groups of people with protected characteristics, e.g. older people, disabled people. Impacts should be significantly positive on this objective.	+	This option would result in the delivery of housing for older people and for those with specialists needs. Although the impacts would be positive, this may result in a lengthy policy, or a policy that does not adequately address the individual needs of these groups of people and may not fully address the needs of people with protected characteristics.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	This option does not provide clear guidance for applicants in terms of requirements for these types of housing and this lack of clarity may restrict applications from coming forward. However, lack of clear policy guidance may be considered to be more flexible, which could help to bring forward applications. Overall impacts should be positive, with house-building intrinsically linked to economic growth.	+	This option will provide clear policy guidance which will provide certainty to applicants and may help to bring forward this type of development, having economic benefits. However, applicants may find the requirements more restrictive. Overall impacts should still be positive.	+	Impacts considered to be similar to option 2.

## Summary

### Option 1 – NPPF only

- This option was found to have positive impacts on the objectives for making the best use of land, housing, health, equalities and economic development.
- This option will result in the delivery of housing to meet certain needs, which will have positive impacts on the social determinants of health, could help to make the best use of land in the city and will support economic development. This option should also have benefits for equalities by helping to meet

certain needs, including those of people with protected characteristics. However, lack of clear policy guidance may result in opportunities to fully tackle the housing issues, needs and requirements of these groups of people being missed.

### **Option 2 – Separate policies**

- This option was found to have significant positive impacts on the objectives for housing, health, and equalities. This option will result in the delivery of housing to meet certain needs, which will have positive impacts on the social determinants of health, and should also ensure that the issues, needs and requirements of certain groups of people, including those with protected characteristics, are met.
- This option was found to have positive impacts on the objectives for making the best use of land and economic development. This option will result in delivery of housing to meet a wide range of needs which could help to make the best use of land and support economic development.

### **Option 3 – One combined policy**

- This option was found to have positive impacts on the objectives for making the best use of land, housing, health, equalities and economic development.
- As with option 1, this option will result in the delivery of housing to meet certain needs, which will have positive impacts on the social determinants of health, could help to make the best use of land in the city and will support economic development. This option should also have benefits for equalities by helping to meet certain needs, including those of people with protected characteristics. However, having one lengthy policy may mean there is less consideration of the issues, needs and requirements of these groups of people.

### **Preferred Option**

- Although all options should have positive impacts, option 2 has greater potential for more significant positive impacts. In particular, option 2 has greater potential for more significant positive impacts on the objective for housing, health and equalities, with this option providing the opportunity to allow for greater consideration of the specific housing needs, issues and requirements of different groups of people, including those with protected characteristics.

## **CPP2 Options Appraisal: DM6 Build to Rent Housing Options**

### **Options Appraisal**

- Option 1 : Don't include a build to rent policy in CPP2, but rely on emerging national guidance in draft NPPF and PPG.
- Option 2 : Include a build to rent policy including the minimum affordable housing requirements set out in the draft PPG (i.e 20% affordable housing at a minimum rent discount of 20%) rather than reflecting Policy CP20 requirements (40% affordable housing at rent levels to be agreed with the council).

- Option 3: Include a build to rent policy that seeks the provision of affordable housing in line with Policy CP20 (40% affordable housing at rent levels to be agreed with the council).

### Assumptions

- Option 3 assumes that all build to rent development will provide more than 15 units to be consistent with policy CP20 (which only requires 40% affordable on schemes providing 15 or more dwellings).
- This assessment does not assess indirect impacts of housing developing, e.g. any potential for site based impacts or increased resource use and assumes that over-arching policies will address these issues.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	According to the Census over 30,000 people commute into the city for work each day, with key areas being from Lewes, Adur, Mid-Sussex and Worthing. The cost of housing within BH is likely to be a key driver of this. This option would result in delivery of build to rent accommodation including 20% affordable rented housing. This may indirectly help achieve this objective, through potentially reducing the need to commute in to the city for work purposes from places where housing is less expensive.	+	Impacts likely to be similar to option 1, as this is likely to result in a similar amount of affordable rented accommodation, enabling people to access affordable accommodation and live in the city, potentially reducing the need to commute in.	+	The potential for positive impacts is likely to be greater with this option than with options 1 and 2, as this option should result in a greater proportion of affordable rented dwellings. However as the link to this objective is fairly indirect, the positive impacts are not considered to be significantly positive.
14. To provide housing, including affordable housing,	+	House prices continue to rise in Brighton & Hove, with average prices to buy continuing to be between 6	+	This option shows a clear indication to the market that build to rent development would be	++	This option also shows a clear indication to the market that build to rent development would be supported



<p>to contribute towards meeting local needs</p>		<p>and 16 times the median household income locally.<sup>14</sup> Average rents are also high and continue to rise, with rents representing between 30% and 83% of gross average incomes.<sup>15</sup> Local Housing Allowance is less than all average rents for different sized properties which reduces the changes of those on benefits from finding an affordable home. A higher proportion of households in BH rent their homes compared with regional and UK average, indicating a need to provide rented accommodation locally. OAN for Brighton Study indicate that over 2,000 affordable dwellings per year would need to be delivered to meet local affordable housing need. All this local evidence shows strong need for both newly built rented accommodation and for affordable rented accommodation. This option would enable this type of housing to come forward, as per the policy and guidance within the NPFF, suggesting that 20% of the housing provided would be affordable.</p>		<p>supported locally, and would enable the council to specify in policy the proportion of affordable rented that should be provided. It would also enable the council to specify other requirements within policy that would be of benefits to tenants and ensure that affordable rented, and rented stock built remains as such. However, in terms of housing delivery and affordable housing delivery, this option is unlikely to achieve greater numbers of affordable rented properties than option 1, as both would require 20% affordable provision.</p>	<p>locally. This option would require 40% of provision to be affordable, in accordance with local policy. This would result in a greater proportion of affordable rented units and would make a greater contribution to affordable housing need locally when compared with options 1 and 2.</p>
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<sup>14</sup> In 2017: average prices as follows~ studio flat £175,127 = 6xmedian income; 2-bed flat £376,459 = 12xmedian income; 2-bed house £394,520 = 13xmedian income; 3-bed house £491,768 = 16xmedian income (median household income 29,100)

<sup>15</sup> In 2017, average cost of renting: studio flat was £728 – 30% of gross income; 2 bed flat was £1,318 – 54% of gross income; 4-bed house £2,025 -83% of gross income; all based on median household income of £29,100.

16. To improve health and well-being, and reduce inequalities in health	+	Housing is one of the wider determinants of health. This option should therefore contribute towards achieving this objective through delivery of a tenure of housing for which there is a high demand locally, enabling people to access a rented home, including affordable rented home.	++	This option shows a clear indication to the market that build to rent development would be supported locally. This may help to bring forward this type of application and could be more positive than option 1 which solely relies on the NPPF. This option also enable the council to address other issues within policy, that could have impacts upon health, e.g. the need for build to rent housing to be of a certain standard.	++	Impacts considered to be the same as option 2, as this option also shows a clear indication to the market that build to rent development would be supported locally, may help to bring forward this type of development, helping to meet one of the wider determinants of health and enables the council to address other issues such as standards.
18. To increase equality and social inclusion	+	The Index for Multiple Deprivation includes Barriers to Housing and Services as one of its domains. This includes physical and financial accessibility of housing. BH is ranked the 73 <sup>rd</sup> most deprived out of 326 local authorities in this domain and is one of the highest domains across the 7 other measures of deprivation. This option would enable build to rent accommodation to come forward, which may increase availability and access to the rental market. This option would also deliver 20% affordable units, also helping to increase access and availability of affordable rented and may therefore contribute towards reducing housing based deprivation.	+	Impacts considered to be the same as option 1, as although this option shows support for build to rent, the proportion of affordable units would be the minimum as described within the NPPF. Therefore this option could contribute to reducing deprivation however is unlikely to be any different to option 1.	++	This option would require 40% of provision to be affordable, in accordance with local policy. This would result in a greater proportion of affordable rented units and would make a greater contribution to affordable housing need locally when compared with options 1 and 2, and would potentially have a greater positive impact in terms of reducing housing based deprivation.

<p>19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>	<p>+</p>	<p>As outlined above, evidence suggests that BH is becoming increasingly unaffordable due to high housing costs and relatively low average incomes. This impacts on the local economy as can make it difficult to recruit and retain staff in various sectors, impacting on the local workforce and local economy. Staff may re-locate to similarly paid jobs elsewhere where the cost of housing is lower.</p> <p>Build to rent housing should come forward with this option including affordable rented. This can support economic growth due to the intrinsic link between house building and the economy, and also through the ability for employers to retain staff and therefore potentially increase productivity.</p>	<p>+</p>	<p>This option provides greater certainty to developers that build to rent housing would be supported, which may help to bring forward applications and could further stimulate economic growth, as well as help with recruitment and retention of staff through provision of greater housing options.</p> <p>This option may result in greater restrictions and could be less flexible than option 1, however on balance should still result in positive impacts.</p>	<p>++</p>	<p>This option requires 40% of build to rent to be affordable, which is higher than the other options. This would make a more significant contribution to affordable housing stock and may have a more significant positive impact on the ability for employers to recruit and retain staff.</p> <p>This option is likely to be the most restrictive when compared with other options, however it is recognised that viability will be taken into consideration with all schemes, which should ensure that schemes can be delivered.</p>
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**Summary – No Build to Rent policy. NPPF only**

**Option 1**

- This option was found to have potential for positive impacts on the objectives for transport, housing, health, equalities and economic development. This option should result in delivery of this tenure of housing, including 20% affordable rented, which supports the housing objective, helps to deliver one of the wider determinants of health, could contribute towards reducing housing based deprivation through increasing access and affordability of housing, and could potentially help to reduce in-commuting, some of which is likely to be the result of the high cost of housing locally. As house-building is intrinsically linked to economic growth, this option could also support economic development as well as help with recruitment and staff retention.

**Option 2 – Build to Rent Policy which requires 20% affordable housing**

- This option was found to have potential for significant positive impacts on the objective for health. Access to housing is one of the wider determinants of health, and this option would help to deliver this tenure of housing, including affordable housing and would also give the ability to address other issues that can impact upon health, such as requiring a certain standard or size of housing.
- This option was found to have potential for positive impacts on the objective for transport, housing, equalities and economic development similarly to option 1. This option should result in rented accommodation including 20% affordable rented, which supports the housing objective, could contribute towards reducing housing based deprivation through increasing access and affordability of housing, and could potentially help to reduce in-commuting, some of which is likely to be the result of the high cost of housing locally, and also support economic development as well as help with recruitment and staff retention.

### **Option 3 – Build to Rent Policy which requires 40% affordable housing**

- This option was found to have potential for significant positive impacts on the objective for housing, health, equalities and economic development. This option should result in rented accommodation including 40% affordable rented, which significantly supports the housing objective through increasing affordable rented housing when compared to other options, could therefore contribute more significantly towards reducing housing based deprivation through increasing access and affordability of housing, and also support economic development through house-building, including through recruitment and staff retention.
- This option was found to have potential for positive impacts on the objective for transport, similarly to options 1 and 2 as could potentially help to reduce in-commuting, some of which is likely to be the result of the high cost of housing locally, however as this is a fairly indirect link, it is not considered to be significant.

### **Preferred Option**

- Although all options should result in positive impacts across all relevant objectives, option 3 has greater potential for more significant positive impact for the housing, equalities and economic development objectives than other options, as this option should result in a greater proportion of affordable rented housing, which will help to meet the high demand and need locally, could help to reduce housing based deprivation through increasing access and affordability of housing, and could support economic development through the links between economic growth and housing and the potential to help with recruitment and retention of staff locally.

### **CPP2 Options Appraisal: DM7 HMOs**

#### **Options:**

- Option 1) No additional policy relating to HMOs in CPP2 – rely on CPP1 Policy CP21, part (ii)

- Option 2) Policy seeking to protect existing HMOs and resist conversion to C3
- Option 3) Policy to support conversion of existing HMOs to C3.

**Assumptions / explanations:**

- C3 to C4 (small HMO) is permitted development; however PD rights have been removed in 5 wards under an Article 4 Direction.
- CPP1 CP21 applies to COU C3 to C4 in these 5 wards only, and C3 to sui generis HMO in all wards.
- With option 1, only Part (ii) of this policy is considered in this assessment (e.g. the part that relates to HMOs and not PBSA)
- Options 2 and 3 would only be applicable to larger sui generis HMOs to C3, as C4 HMOs are able to change use to C3 under permitted development.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	0/-?	This option permits COU from C3 to C4/Sui Generis HMO in areas of the city where the concentration is not over a certain amount. Listed buildings could be converted into HMOs however these would need listed building consent, which would assess any potential for adverse effects on the heritage asset resulting from conversion – therefore impacts of this should be negligible. However, this option does not show support for conversion back from larger HMO to C3 dwelling which may miss opportunities to improve heritage assets, potentially having adverse impacts. Impacts are also uncertain as would depend on the HMO being within a heritage asset,	-?	If an HMO is within a listed building, then conversion back to a C3 dwelling could have benefits for the listed building. This option restricts conversion back to C3 and could therefore have adverse impacts on this objective as may prevent opportunities to improve heritage assets. Impacts are also uncertain as would depend on whether the HMO was within a heritage asset.	+?	This option could result in positive impacts for this objective. Some HMOs may be within listed buildings or within Conservation Areas. In these cases conversion back to C3 may be of benefit for the heritage asset. Impacts also uncertain as this would depend on the HMO being within a heritage asset.
5. To reduce the	-/+	HMOs can lead to an increase in cars	-	Smaller C4 HMOs would be able to	+	This option could have positive

need to travel by car, encourage travel by sustainable forms of transport and improve travel choice		associated with the dwelling in comparison to when the dwelling is occupied by one family. This option only allows HMO development in areas of the city where concentrations are not over a certain amount. This could have positive impacts with regards to transport impacts as may help to minimise any increase in localised car ownership that results from HMOs. However this option would not show support for conversion from HMO back to C3 and this could mean that opportunities to improve transport issues are missed.		change back to C3 under PD. This option would prevent larger HMOs from converting back to C3. As HMOs can lead to an increase in car ownership, this option could have adverse localised transport impacts that may otherwise be improved if conversion back to C3 was permitted.		transport impacts, as could lead to a reduction in car-ownership in the location around the HMO.
6. To improve air and noise quality	-/+	HMOs can result in noise and amenity impacts. This option only allows HMO development in areas of the city where concentrations are not over a certain amount. This could have positive impacts with regards to noise amenity impacts. However this option would not show support for conversion from HMO back to C3 and this could have mean that opportunities to improve noise issues are missed.	-	Smaller C4 HMOs would be able to change back to C3 under PD. This option would prevent larger HMOs from converting back to C3. As HMOs can have noise amenity impacts, this option may miss the opportunity to improve noise issues if conversion back to C3 was allowed.	+	This option could lead to a reduction in HMOs, which could have positive impacts with regards to noise issues.
13. To make the best use of land available	+	This option restricts the over-concentration of HMOs and therefore helps to ensure there is a range of mix of housing types. It should also prevent the loss of family	-	This option would prevent larger HMOs from converting back to C3. This would be inflexible and may not allow for future changes in the housing market. If there is a need	+	This option would support conversion of larger HMOs to C3 dwellings. This option is considered to be flexible and may help to make the best use of the building stock, particularly as this may

		<p>sized housing to HMOs in areas of over concentration helping to maintain a balance. This contributes towards making the best use of land by ensuring there is a mix of housing types.</p>		<p>to convert large HMOs back to C3 in the future, this policy would restrict this from happening and would therefore not be making a good use of building stock.</p>		<p>result in an increase in family-sized dwelling in the city, which are in need locally and can be difficult to deliver due to land constraints.</p>
<p>14. To provide housing, including affordable housing, to contribute towards meeting local needs</p>	+	<p>This option should prevent further change of use of C3 to C4 in 5 wards of the city, and C3 to sui generis HMOs in areas already considered to contain a high percentage of HMOs. This will have a positive impact on this objective through helping to retain family-type housing in these areas, which has been identified as a need in the city and is difficult to deliver due to land constraints. However it is noted that HMOs make a valuable contribution to the private rented stock and provide an essential source of housing particularly for younger people, young professionals and people on lower incomes due to the high cost of housing in the city. As the Article 4 Direction only applies to certain wards of the city, C3 to C4 HMOs could still come forward in the other areas of the city under permitted development, which should help to ensure that this type of housing remains available to meet the needs of the market.</p>	+	<p>HMOs provide an essential source of private rented lower-cost housing in the city, meeting a variety of housing needs, and therefore this policy of protection should ensure that this type of housing remains available in the city. However, this option would prevent sui generis HMOs changing back to C3. This may mean that opportunities to convert HMOs back to family housing, or other non HMO housing, are lost. Overall, impacts are still considered to be positive reflective the importance of HMOs in the city.</p>	+	<p>This option shows support for conversion of larger sui generis HMOs back to C3. This could help to increase the supply of family housing which has been identified as a need in the city and can be difficult to deliver due to land constraints. However this also may result in a loss of HMO accommodation which is an important source of lower-cost housing in the city. Overall, impacts are still considered to be positive.</p>

		Impacts considered to be positive.				
16. To improve health and well-being, and reduce inequalities in health	-/+	HMOs can have a detrimental impact on residential amenity, impacting on health, e.g. due to increased noise issues. This option only allows HMO development in areas of the city where concentrations are not over a certain amount. This could have positive impacts with regards to noise amenity impacts. However this option would not show support for conversion from HMO back to C3 and this could have meant that opportunities to improve noise issues are missed. Overall impacts are mixed.	-	Smaller C4 HMOs would be able to change back to C3 under PD. This option would prevent larger HMOs from converting back to C3. As HMOs can have noise amenity impacts, this option may miss the opportunity to improve noise issues if conversion back to C3 was permitted.	+	This option could lead to a reduction in HMOs, which could have positive impacts with regards to noise issues.
18. To increase equality and social inclusion	+	The “Barriers to Housing” domain in the Index for Multiple Deprivation is based on a number of underlying indicators, including housing affordability. 18% of SOA in the city are within the most 20% deprived housing domain in the country. HMOs form an important source of lower-cost housing in the city. This option only permits HMOs to come forward in certain areas of the city if there is a low existing concentration, however HMOs can still come forward under PD rights elsewhere in the city. This option is therefore not considered to be overly prohibitive and will still allow HMOs	+	This option would protect larger HMOs. HMOs form an important source of lower cost housing. Therefore, their protection should help to ensure this form of housing remains in the city, potentially contributing towards reducing housing based deprivation. However it is recognised that the impacts on this are likely to be negligible due to other factors that contribute towards in-affordability of housing in the city.	-	This option may result in a reduction in larger HMOs in the city. As already described, HMOs are an important source of lower-cost housing in the city. This option could therefore have adverse impacts on this objective, as could reduce the availability of lower-cost housing in the city, potentially impacting on housing-based deprivation, although it is recognised that housing in-affordability in the city is due to a number of factors.



		to come forward. This should impact positively on this objective, potentially contributing towards reducing housing-based deprivation. However it is recognised that the impacts on this are likely to be negligible due to other factors that contribute towards in-affordability of housing in the city.				
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## Summary

### Option 1 – rely on CP21

- This option had potential for positive impacts on objectives for making the best use of land, housing and equalities. HMOs are an important source of lower-cost housing in the city, and this option permits HMOs in areas where there is not considered to be a high concentration, however the restrictions in place should also help to retain larger, family-type housing and should help to maintain a balanced mix, making the best use of land available.
- This option had potential for mixed (adverse/positive) impacts on the objectives for transport, air/noise quality and health. The restriction will prevent over-concentration, and this should prevent or minimise certain problems associated with HMOs, such as noise and transport issues both of which can impact on residential amenity and health. However, this option does not show support for conversion back to C3, and this may mean that opportunities to improve issues are missed.
- This option had potential for negligible/adverse but fairly uncertain impacts on the heritage objective. It is assumed that conversion of C3 to HMO would not have heritage impacts as this would require listed building consent that would minimise the risk of adverse impacts. However this option does not show support for conversion back to C3, which could have beneficial impacts for heritage if the HMO was within a listed building.

### Option 2 – restrict conversions of HMOs to C3

- This option had potential for positive impacts on objectives for the housing and equalities objectives. HMOs provide an essential source of private rented lower-cost housing in the city, meeting a variety of housing needs, and therefore this policy of protection should ensure that this type of housing remains available in the city. This will help ensure there is a supply of affordable housing which is one of the measures of housing deprivation.
- This option had potential for adverse impacts on objectives for transport, air/noise quality and health. Certain issues can arise in areas with HMOs, such as transport and noise issues which can impact upon residential amenity. Therefore a policy which restricts conversion back to C3 may miss opportunities to improve these issues.

- This option also had the potential for adverse uncertain impacts on heritage and making the best use of land. An HMO could be located within a listed building. This option would prevent conversions which may result in opportunities to improve heritage assets being missed. This option is also considered to be inflexible and may not allow the market to respond to changing needs in the future, which would not enable the best of use of land and buildings to be made.

### **Option 3 – support conversions of HMOs to C3**

- This option had potential for positive impacts on the objectives for housing and making the best use of land. Although it is recognised that HMOs are an important source of housing in the city, this option could help to increase family-type housing in the city which is also in need and difficult to deliver due to land constraints. This option is considered to be flexible in allowing conversions, should the market decide, which would help to make the best use of land available.
- This option had potential for positive impacts on objectives for transport, air/noise quality and health. A policy which supports conversion back to C3 may help to minimise or improve some of the issues associated with HMOs such as transport and noise issues, which can impact on residential amenity and health.
- This option also had the potential for positive uncertain impacts on heritage, as may result in improvements to heritage assets if the HMO is situated within a listed building.
- This option had potential for adverse impacts on the equalities objective due to the high level of housing deprivation in the city. Housing in-affordability is an issue in the city, and a loss of HMO accommodation will reduce the availability of lower-cost housing in the city, potentially increasing housing deprivation, although it is recognised that housing in-affordability is due to a number of factors.

### **Preferred Option**

- Option 3 has the most potential for positive impacts and is the preferred option. Whilst HMO development can still come forward with this option, in accordance with CP21, this option provides support for conversion back to C3 where desired. This is considered to be the most flexible approach and will allow the market to respond to future changes if needed, could help to minimise issues associated with HMOs, such as transport and noise issues, and could also help to increase delivery of family type housing. However, it is acknowledged that HMOs provide an important source of lower-cost housing in the city and the widespread loss of this type of housing could result in an increase in housing in-affordability, although it is recognised that this issue is based on a number of other factors.

**CPP2 Options Appraisal: DM8 and H3 Purpose Built Student Accommodation**

**Appraisal**

Option 1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA

Option 2) Criteria based policy with no preferred sites identified

Option 3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.

**Assumptions**

- Amount and location of site allocations is unknown
- New sites for PBSA could still come forward on non-allocated sites with option 1

<b>SA Objective</b>	<b>1</b>	<b>Summary of Effects</b>	<b>2</b>	<b>Summary of Effects</b>	<b>3</b>	<b>Summary of Effects</b>
1. To protect, conserve and achieve a net gain in biodiversity	-?	All types of development could have adverse impacts on biodiversity depending on their location, however also offers an opportunity to provide net gains. CP21 does not include criteria relating to consideration of biodiversity. Impacts could therefore be adverse although are also uncertain as the location of any new, non-allocated sites are unknown.	-/0?	Sites for PBSA could have an adverse impact on biodiversity depending on their location. The inclusion of criteria that discourages development which would result in an adverse impact on biodiversity could result in a neutral effect. Effects are also uncertain until criteria are known.	-/0?	Sites for PBSA could have an adverse effect on biodiversity depending on their location. If this option identified sites which did not impact upon biodiversity, then this option could avoid an adverse effect and have a neutral effect. Effects are also uncertain until sites are known.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-?	CP21 does not include criteria relating to consideration of open space impacts and therefore applications for PBSA could come forward in unsuitable locations with this option, including those which would have an adverse impact on open space provision. Impacts could	-/0?	Sites for PBSA could have an adverse impact on open space, depending on their location. The inclusion of criteria that discourages development which would result in loss of open space could result in a neutral effect. Effects are also uncertain until	-/0?	Sites for PBSA could all have an adverse effect on open space depending on where they are located. If this option identified sites which did not result in loss of open space, then this option could avoid an adverse effect and have a neutral effect. Effects are also uncertain until sites are

		therefore be adverse although are also uncertain as the location of any new, non-allocated sites are unknown.		criteria are known.		known.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-?	CP21 does not include criteria relating to consideration of landscape impacts. This option could therefore result in PBSA coming forwards in sensitive locations, including those that may have adverse impacts on the SDNP and its setting. Effects are also uncertain and would depend on the site coming forward.	-/+?	Sites for PBSA could have an adverse impact on the SDNP and/or its setting depending on their location. The inclusion of criteria that discourages development which would result in an adverse impact on the SDNP could result in a neutral effect. If criteria encouraged development to improve links to the SDNP impacts could be positive. Effects are also uncertain until criteria are known.	-/+?	Sites for PBSA could have an adverse effect on the SDNP and its setting. If this option identified less sensitive sites which did not result in harm to the SDNP/setting, then this option could avoid an adverse effect and have a neutral effect. If this option identified sites which improved access to the SDNP, then impacts could be positive. Effects are also uncertain until sites are known.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	CP21.2 allows for high density development in locations where they are compatible with existing townscape. This should therefore support the integration of new development into the existing built environment and have positive impacts on this objective.	0	It is considered unlikely that the policy will include any additional requirements relating the historic built environment or townscapes. Impacts therefore neutral.	0	It is considered unlikely that the policy will include any additional requirements relating the historic built environment or townscapes. Impacts therefore neutral.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport	+	CP21. 3 requires PBSA to be located along sustainable transport corridors where travel to University via sustainable means can be maximised. CP21.4 requires	0	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel. Impacts therefore neutral.	+	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel as this is already within CP21. However this option also

and improve travel choice		proposals to minimise impacts on on-street parking. Impacts should be positive.				provides the opportunity to allocate sites where sustainable transport provision is good, which could impact positively on this objective.
6. To improve air and noise quality	+	CP21. 3 requires PBSA to be located along sustainable transport corridors where travel to University via sustainable means can be maximised. This should have positive impacts for air quality. This is also likely to have benefits in terms of potential for noise amenity impacts, as any new sites that come forward along sustainable transport corridors are likely to be located within areas where there is already a mixture of uses, rather than in predominantly residential areas. In addition CP21.1 requires PBSA to be located in areas where amenity impacts, including those from increased noise, will not be unacceptable. Overall, impacts should be positive.	0	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel nor avoiding noise impacts and residential amenity.	+?	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel. However site allocation could help to reduce noise amenity impacts as would reduce reliance on HMOs to meet students' housing needs.
8. To reduce the risk from all sources of flooding to and from development	-?	All types of development could increase the risk of flooding, and this may vary according to the nature and form of the site. However development provides an opportunity to incorporate measures to reduce flood risk. CP21 does not include criteria relating to consideration of flood	-/+?	Sites for PBSA could have an adverse impact on the flood risk depending on their location. The inclusion of criteria that encourages development to consider flood risk could result in a more positive effect. Effects are also uncertain until criteria are known.	-/+?	If this option identified less sensitive sites then this option could avoid an adverse effect and have a more positive effect. Effects are also uncertain until sites are known.

		risk. Impacts could therefore be adverse although are also uncertain as the location of any new, non-allocated sites are unknown.				
10. To increase the city's resilience and ability to adapt to climate change	-?	See objective 8	-/+?	See objective 8	-/+?	See objective 8
11. To improve soil quality	0	CP21 does not include any criteria which may encourage remediation of contaminated land. Impacts considered to be neutral.	+?	PBSA could be delivered on sites with contamination and result in remediation of contaminated land. This option could include criteria that would support PBSA this, having a positive effect, however is also uncertain as criteria are unknown.	+?	PBSA could be delivered on sites with contamination and result in remediation of contaminated land. This option could allocate such sites, having a positive effect, however is also uncertain as sites are unknown.
12. To minimise and sustainably manage waste	-	PBSA will result in an increase of waste.	-	As option 1.	-	As option 1.
13. To make the best use of land available	+	There is a need for PBSA in the city. This option provides a policy framework which helps to balance competing needs e.g. CP21.7 does not allow for PBSA to come forward on sites allocated for housing, or identified as having potential in the SHLAA. In addition, CP21 makes 5 site allocations. This should help to balance the needs of the city.	+?	It is considered unlikely that the policy will include any additional requirements relating to ensuring that sites with housing potential are not developed for PBSA. However the policy could include criteria that ensured the most effective use of a site was made – therefore maximising site potential, due to the increasing need. However, impacts are uncertain as criteria are unknown.	++?	The allocation of sites for PBSA is considered to have a significant positive impact on this objective as would help to ensure the competing needs of the city are met, and would also enable PBSA to be located in the most suitable locations.
14. To provide housing, including	-/+	CPP1 contains 5 site allocations for PBSA, which will contribute towards	-/+	This option will further support proposals for PBSA and will help	+	This option will support proposals for PBSA and will provide clarity and

affordable housing, to contribute towards meeting local needs		meeting forecasted demand, but not meet demand. The policy (para 7) should protect against the loss of sites considered to be suitable for general C3 housing, therefore having positive impacts. However this option could result in the need for more student HMOs to help meet demand, which can have a detrimental effect on housing provision through the loss of larger family sized dwellings, which are also in demand in the city. Overall impacts are mixed.		applicants to determine where they may be considered acceptable based on the criteria of the policy. However, this option may result in speculative sites coming forward that are could be suitable for C3 housing land supply, impacting on the city's ability to meet its C3 housing target. Impacts also considered to be mixed.		certainty to applicants with regards to acceptability in principle of PBSA on certain sites. This option should prevent speculative sites coming forward on land suitable for C3 housing, and should also help to reduce the reliance on HMOs which impacts positively on the type of housing that is often converted to HMOs. Overall impacts should be positive.
15. To improve the range, quality and accessibility of services and facilities.	-	Although this option should result in PBSA, it will not deliver the amount required to meet demand. Lack of PBSA can result in an increase in student HMOs which tend to be located in housing that would traditionally be occupied by families due to its size. Some services and facilities within areas of the city have become less viable due to the amount of students living in that area e.g. schools. This option could therefore result in an indirect adverse impact on this objective.	-	Impacts considered to be the same as option 1.	+	This option may help to ensure that communities can meet their needs locally through ensuring viable local services such as schools. E.g. the delivery of PBSA can help to reduce reliance on HMOs, and can help to maintain a more mixed and balanced community.
16. To improve health and well-being, and reduce inequalities in health	+	Student activity and lifestyles can have a detrimental impact on residential amenity, impacting on health. CP21.1 requires PBSA to be located in areas where amenity	0	It is considered unlikely that the policy will include any additional requirements relating avoiding noise impacts and residential amenity. Impacts therefore	+?	Site allocations could help to reduce the risk of adverse amenity impacts particularly those relating to noise and residential amenity. Impacts positive but uncertain as location of sites are

		impacts, including those from increased noise, will not be unacceptable. Overall, impacts should be positive.		neutral.		unknown.
17. To improve community safety, and reduce crime and fear of crime	+	Policy CP21.5 requires proposals to be safe and secure. This should have a positive impact on this objective.	0	It is considered unlikely that the policy will include any additional requirements relating to safety. Impacts therefore neutral.	0	It is considered unlikely that the policy will include any additional requirements relating to safety. Impacts therefore neutral.
Summary						
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	The policy should help bring forward PBSA at the 5 sites identified in CP21 and also provides a framework for other sites of PBSA. Impacts should be positive resulting from the construction of new buildings and also through the contribution made by students in the city towards the economy.	+	Although this option provides clarity over the approach to assessing applications, it does not provide certainty to applicants over the sites where PBSA will be acceptable. This may hinder applications. However this option allows the market to decide and could be perceived as the more flexible approach. Overall, impacts are likely to be positive as criteria should help to guide applications.	+	This option provides certainty and clarity to applicants with regards to the sites where PBSA would be considered acceptable. This may help to bring forward applications having benefits for the economy. However, is more inflexible as removes the ability for the market to decide and may result in vacant site. The criteria should help to retain some flexibility in terms of alternative sites coming forward. Overall impacts are likely to be positive.

## Summary

### Option 1 – CP21 only

- This option had potential for positive impacts on a number of objectives as CP21 already includes a range of criteria that should address some issues, including heritage assets, travel, air quality, making the best use of land, health and community safety.
- This option had potential for adverse impacts on some of the site based objectives, including biodiversity, open space, SDNP and flood risk, as sites could come forward which could have an adverse impact on these issues and CP21 does not include criteria to address these issues.



- This option also had the potential for adverse impacts on objective for access to services. This option may still result in reliance on the HMO sector which can result in some services becoming unviable due to the predominance of students in certain areas.
- This option had potential for mixed (adverse/positive) impacts on the housing objective. This option contains 5 site allocations for PBSA, which will contribute towards meeting forecasted demand, but not meet demand. Speculative sites may come forward with this option and this option could result in the need for more student HMOs to help meet demand, which can have a detrimental effect on housing provision through the loss of larger family sized dwellings.
- This option had potential for positive impacts on the economic development objective through construction related employment and through the positive contribution students make towards the local economy

### **Option 2 – criteria policy**

- This option had potential for mixed (adverse/neutral) impacts on biodiversity and open space. Impacts could be adverse as could result in loss or damage to biodiversity and loss of open space, however could be neutral if the policy criteria included consideration of these issues.
- This option had potential for mixed (adverse/positive) impacts on the SDNP and flood risk, as could result in damage to the setting of the SDNP and could increase flood risk, however could be positive if criteria encouraged improving access to the SDNP and considered flood risk issues.
- This option was also found to have mixed (adverse/positive) impacts on the housing objective. This option will further support proposals for PBSA and will help applicants to determine where they may be considered acceptable based on the criteria of the policy, however may result in speculative sites coming forward that could be more suitable for C3 housing land supply, impacting on the city’s ability to meet its C3 housing target. This option may also still result in a reliance on HMOs.
- This option also had the potential for adverse impacts on objective for access to services. This option may still result in reliance on the HMO sector which can result in some services becoming unviable due to the predominance of students in certain areas.
- This option had positive uncertain impacts on objectives relating to soil quality and making the best use of land. This option could include criteria that supported PBSA coming forward on contaminated land, and could also include criteria relating to making the most effective use of sites, which would result in a positive impact.
- This option had potential for positive impacts on objectives for economic development. This option provides clarity over the approach to assessing applications, however does not provide certainty to applicants over the sites where PBSA will be acceptable. Although this may hinder applications, this option allows the market to decide and could be perceived as the more flexible approach.
- This option had neutral effects on various objectives which option 1 had a positive impact upon, as these issues are considered to be adequately addressed by CP21 and therefore are unlikely to be repeated in a new policy, including heritage assets, travel, air quality, water quality, greenhouse gas emissions, and community safety.

### **Option 3 –criteria policy and site allocations**

- As with option 2, this option had potential for mixed (adverse/neutral) impacts on biodiversity and open space. Impacts could be adverse as could result in loss or damage to biodiversity and loss of open space, however could be neutral if the policy criteria included consideration of these issues, or if the sites allocated avoided these issues.
- As with option 2, this option had potential for mixed (adverse/positive) impacts on the SDNP and flood risk, as could result in damage to the setting of the SDNP and could increase flood risk, however could be positive if criteria encouraged improving access to the SDNP and considered flood risk issues, or if the sites allocated avoided these issues.
- This option has potential for positive uncertain impacts on the objectives relating to air/noise quality and health, as this option could allow for the consideration of cumulative effects of more than one new PBSA development on residential amenity to be considered as part of the site selection process.
- As with option 2, this option had potential for positive uncertain impact on the objective relating to soil quality, as could include criteria supporting development on contaminated land, or could allocate such sites.
- This option was found to have positive impacts on the housing objective. This option will support proposals for PBSA and will provide clarity and certainty to applicants with regards to acceptability in principle of PBSA on certain sites. This option should prevent speculative sites coming forward on land suitable for C3 housing, and should also help to reduce the reliance on HMOs which impacts positively on the type of housing that is often converted to HMOs. This also impacts positively on the objective for access to services, as may help to ensure services remain viable and helps to create more balanced and mixed communities.
- This option was found to have potential for significant positive impact on making the best use of land. This option is considered to provide greater certainty for developers, which may help to bring development forward. By allocating sites that are considered to be the most suitable for PBSA, it also helps to protect sites for other uses, making the best use of sites in the city.
- As with option 2, this option should also have positive impacts on economic development. This option provides certainty and clarity to applicants with regards to the sites where PBSA would be considered acceptable and this may help to bring forward applications having benefits for the economy. However, this option is more inflexible as removes the ability for the market to decide and may result in vacant sites.
- This option has potential for positive impacts for reducing the need to travel, as could allocate sites with good sustainable transport access.
- As with option 2, This option also had neutral effects on various objectives which option 1 had a positive impact upon, as these issues are considered to be adequately addressed by CP21 and therefore are unlikely to be repeated in a new policy, including heritage assets, water quality, greenhouse gas emissions, and community safety.

### **Preferred Option**

- With all options, the potential for some of the adverse impacts would be mitigated through implementation of other CPP1 and other policy requirements.
- Overall option 3 had the most potential for positive impacts across the greatest range of sustainability objectives, in particular for housing as it provides greater certainty where PBSA would be supported which may help to bring forward development and reduce reliance on the HMO market, and also for access to services and making the best use of land as could help to ensure the competing development needs of the city are met. All options were found to have potential for adverse impacts against some of the environmental site-based objectives although options 2 and 3 would provide the opportunity to

address any site specific considerations. Option 2 was considered to offer greater flexibility and the ability to respond to changing markets when compared with option 3, however this approach however lacked certainty for developers with the risk that suitable sites may not come forward resulting in increased reliance on the HMO market to meet students’ housing needs.

- Overall, both options 2 and 3 have merits and have greater potential for positive impact than option 1, however option 3 may be slightly advantageous in relation to the housing objective and making the best use of land, and would also provide the ability to address any site based impacts at the site selection stage.

**CPP2 Options Appraisal: DM9 and DM10 Community Facilities /Pubs**

**Appraisal**

- Option 1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)
- Option 2) General policy to protect all community facilities (including pubs)
- Option 3) Specific policy to protect community facilities and additional specific policy to protect pubs

**Assumptions:**

- Assume all options would apply to development of new community facilities as well as protection of existing
- Assume that options 2 and 3 will not repeat any policy of a strategic nature that is included in CPP1.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	New community developments could have adverse impacts on biodiversity depending on their scale and location, however also present an opportunity for net gains. Protection of existing unlikely to have any impact. CPP1 policies should ensure a positive impact for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to biodiversity as this is already provided at a strategic level by CPP1. No impacts anticipated	0	Impacts the same as option 2.
3. To protect, conserve and	+	New community developments could have adverse impacts on	0	It is considered unlikely that this option will provide any further	0	Impacts the same as option 2.

enhance the South Downs National Park and its setting, and improve sustainable access to it		SDNP/setting of depending on their scale and location. Protection of existing facilities unlikely to have any impacts. CPP1 policy SA5 should ensure a positive impact for this objective.		detail with regards to SDNP as this is already provided at a strategic level by CPP1. No impacts anticipated		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	New development could have adverse impacts on the historic built environment. CPP1 policy CP15 should ensure that the impact is positive for this objective. Protection of existing facilities unlikely to have any impacts.  There may be instances of community uses located within listed or historic buildings. CPP1 does not currently provide for protection of existing community uses. This option could therefore be more flexible in allowing the market to decide where change of use may be sought. Flexibility may help development/change of use come forward and this could have a positive effect on this objective, e.g. where a historic building is not in active D use and changing its use would put it into active uses which would be beneficial for the building.	-?	Existing community facilities could be located within listed buildings. This option would seek to protect and retain community uses and this may restrict opportunities to change the use. This could have an adverse impact on this objective e.g. in cases where the building is vacant/in disrepair and changing the use would bring it into an active use. Impacts are also considered to be uncertain and would depend on the site.	-?	Impacts the same as option 2.
5. To reduce the need to travel by car, encourage	-	Although CPP1 SA6 supports new community development in areas of shortfall, CPP1 does not provide	+	Development / retention of community facilities that are located in close proximity to the	+	Development / retention of community facilities and pubs that are located in close proximity to the

travel by sustainable forms of transport and improve travel choice		protection for existing community uses / pubs with the exception of those provided for under CP5 point 4 (museums, arts, cinemas, love music venues and theatres). Lack of policy position for protection of existing facilities may lead to loss, and this could result in the need to travel further to access facilities.		community it serves can help to reduce the need to travel. Impacts should be positive.		community it serves it serves can help to reduce the need to travel. Impacts should be positive.
7. To improve water quality (ecological, chemical and quantity status)	+	Any new development could increase water consumption. Protection of existing facilities unlikely to have any impacts. CPP1 policy sets the strategic approach to minimising water consumption and preventing water pollution. This should ensure impacts of development are positive for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to water as this is already provided at a strategic level by CPP1. No impacts anticipated	0	Impacts the same as option 2.
8. To reduce the risk from all sources of flooding to and from development	+	Any new development could be at risk of flooding or could increase flood risk elsewhere. Protection of existing facilities unlikely to have any impacts. CPP1 policy sets the strategic approach to flood risk. This should ensure impacts of development are positive for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to flood risk as this is already provided at a strategic level by CPP1. No impacts anticipated	0	Impacts the same as option 2.
9. To reduce emissions of greenhouse gases that cause climate change	+	New community developments could increase energy consumption. Protection of existing facilities unlikely to have any impacts. CPP1 policies set the strategic	0	It is considered unlikely that this option will provide any further detail with regards to reducing carbon emissions as this is already provided at a strategic level by	0	Impacts the same as option 2.

		approach to reducing carbon emissions and should ensure a positive impact for this objective.		CPP1. No impacts anticipated.		
10. To increase the city's resilience and ability to adapt to climate change	+	CPP1 policy sets the strategic approach to adapting to climate change. This should ensure impacts of community-based development are positive impacts for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to climate change adaptation as this is already provided at a strategic level by CPP1. No impacts anticipated	0	Impacts the same as option 2.
12. To minimise and sustainably manage waste	+	New community developments has the potential to increase waste. CPP1 policies sets requirements relating to minimising waste.	0	It is considered unlikely that this option will provide any further detail with regards to waste as this is already provided at a strategic level by CPP1. No impacts anticipated	0	Impacts the same as option 2.
13. To make the best use of land available	+	CPP1 does not currently provide for protection of existing community uses. This option could therefore be more flexible in allowing the market to decide where change of use may be sought. Flexibility may help development/change of use come forward and this could have a positive effect on this objective, e.g. through allowing adaptive re-use of vacant buildings and making the best use of sites where vacant.	-	Having a policy framework that protects community uses may restrict other uses from coming forward, e.g. through change of use applications. Where buildings in community uses are vacant this option could have an adverse impact on this objective as may prevent re-development and would not be making the best use of land/sites in the city.	-	Impacts the same as option 2.
15. To improve the range, quality and accessibility of services and facilities.	-/+	Although CPP1 SA6 supports new community development in areas of shortfall, CPP1 does not provide protection for existing community uses / pubs. This option could	+	Retention of existing or creation of new community facilities should increase provision and should ensure ongoing access to community facilities, enabling	++	Retention of existing or creation of new community facilities, and protecting of pubs should increase provision and should ensure ongoing access to community and social

		therefore result in a loss of provision of community facilities and pubs which could prevent communities from meeting their day to day needs locally. Impacts mixed.		communities to meet their needs. Impacts should be positive for this objective.		facilities, enabling communities to meet their needs. Impacts should be significantly positive for this objective.
16. To improve health and well-being, and reduce inequalities in health	-/+	Although CPP1 SA6 supports new community development in areas of shortfall, CPP1 does not provide protection for existing community uses / pubs. This option could therefore result in a loss of provision of community facilities, including health provision, and pubs and could have a detrimental health impact resulting from potential reduced access to health provision but also due to reduced opportunities for social interaction. Impacts mixed.	+	Access to community facilities, including health provision will have direct benefits for health, as well as provide opportunities for community and social interaction, supporting general well-being.	++	Access to community facilities including health provision, will have direct health benefits, and access to pubs and other community uses will provide opportunities for community and social interaction, supporting general well-being.
17. To improve community safety, and reduce crime and fear of crime	-/+	Although CPP1 SA6 supports new community development in areas of shortfall, CPP1 does not provide protection for existing community uses / pubs. This option could therefore result in a loss of provision of community facilities and pubs. Community facilities provide opportunities for community interaction and contribute towards maintaining community safety. The potential for loss of these resources may hinder this.	+	Access to community facilities provides opportunities for greater community interaction, and this can contribute towards and have a positive effect on community safety.	++	Access to community facilities and pubs provide opportunities for greater community interaction, and this can contribute towards and have a positive effect on community safety.
18. To increase equality and social	-/+?	Although CPP1 SA6 supports new community development in areas of	+?	Retention of existing and creation of new facilities could help to	+?	Retention of existing and creation of new facilities could help to meet the

inclusion		shortfall, CPP1 does not provide protection for existing community uses / pubs. This option could therefore result in a loss of provision of community facilities, some of which may provide support for people with protected characteristics, however this is fairly uncertain.		meet the needs of people with protected characteristics, depending on the service delivered.		needs of people with protected characteristics, depending on the service delivered.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	-/+	Although new development would be supported through this option, existing provision may be lost, including any associated jobs. It may also result in loss of facilities that play a vital role in maintaining the vitality of neighbourhood centres. However, this option may allow for change of use into alternative employment generating uses. Overall, impacts are mixed.	-/+	Community facilities provide employment opportunities. This option should help to protect employment opportunities in these uses. Prevention of loss of facilities may also help to maintain the vitality of neighbourhood centres. However, this option may restrict changes of use, e.g. in redundant premises, which may otherwise provide employment and may inhibit regeneration opportunities. Overall, impacts are mixed.	-/+	Community facilities and pubs provide employment opportunities. Pubs in particular can provide a focal point in local centres, and can help to maintain their vitality and footfall. This option should help to protect employment opportunities in these uses. However, this option may restrict changes of use, e.g. in redundant premises, which may otherwise provide employment and may inhibit regeneration opportunities. Overall, impacts are mixed.

## Summary

### Option 1

- This option was found to have positive impacts for a number of environmental objectives as CPP1 sets the strategic approach to addressing various issues associated with development including: biodiversity; SDNP; water quality; flood risk; greenhouse gas emissions; climate change adaptation; and waste.
- This option was found to have positive impacts for the objective for the historic built environment, with CPP1 providing protection from new development. This option may be more flexible in allowing change of use and this could enable redundant historic buildings to be brought back into active uses, reducing the risk of neglect and decay.



- This option was found to have positive impacts for the objective for making the best use of land for similar reasons, as this option could be more flexible in allowing the market to decide where change of use may be sought/beneficial and may enable adaptive re-use of redundant/vacant sites.
- This option was found to have adverse impacts for reducing the need to travel, as the loss of community facilities may result in communities travelling further to meet their needs.
- This option was found to have mixed adverse/positive impacts for improving the range and access of services, as although new community provision in areas of shortfall is supported with this option, there is no protection for existing provision which may result in loss and impact on a community's ability to meet their needs locally.
- This option was also found to have mixed adverse/positive impacts for improving health, improving community safety and increasing social inclusion. New community development would be supported having positive impacts, however this option may result in loss of services which would reduce access to provision, including health services and specialist services that serve vulnerable communities, could reduce opportunities for social and community interaction, and may hinder community safety, all of which would have adverse impacts for these objectives.
- This option was also found to have mixed impacts for economic development. New development would provide employment opportunities having positive impacts. Also, the flexibility of this option may support regeneration into active uses in cases of genuine redundancy. However, it may also result in loss community facilities, including pubs, which provide footfall and can often play a vital role in maintaining vitality of neighbourhood centres.

## Option 2

- This option was found to have positive impacts for reducing the need to travel and improving access to services, as prevention of loss of facilities would enable communities to meet their needs locally.
- This option was found to have positive impacts for health, community safety and social inclusion. The protection of community uses, including health facilities, will have health benefits through access to services, but will also provide opportunities for community and social interaction which contributes towards maintaining community cohesion, promote community safety and supports general well-being.
- This option was found to have mixed impacts for economic development. Community facilities provide employment opportunities and contribute towards maintaining vitality of neighbourhood centres having positive impacts. However, when redundant, and if change of use not supported may inhibit regeneration opportunities having adverse impacts.
- This option was found to have adverse impacts for objectives for the historic built environment and for making the best use of land. A policy which restricts loss may prevent change of use from coming forward in redundant buildings. Where buildings are historic, this could lead to further neglect/decay and in all cases would not be making the best use of land/sites available.
- Unlike option 1, where impacts were positive, this option was found to have no impacts on some of the environmental objectives including biodiversity, SDNP, water quality, flood risk, reducing greenhouse gas emissions, climate change adaptation, and waste. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that option 2 would provide any further details or requirements on the issues.

## Option 3

- This option was found to have positive impacts for reducing the need to travel and improving access to services, as prevention of loss of facilities would enable communities to meet their needs locally.
- This option was found to have potential for significant positive impacts for health, community safety and social inclusion. The protection of community uses and pubs, including health facilities, will have health benefits through access to services, but will also provide opportunities for community and social interaction which contributes towards maintaining community cohesion, promote community safety and supports general well-being.
- This option was found to have mixed impacts for economic development. Community facilities and pubs provide employment opportunities and contribute towards maintaining vitality of neighbourhood centres having positive impacts. However, when redundant, and if change of use not supported may inhibit regeneration opportunities having adverse impacts.
- This option was found to have adverse impacts for objectives for the historic built environment and for making the best use of land. A policy which restricts loss may prevent change of use from coming forward in redundant buildings. Where buildings are historic, this could lead to further neglect/decay and in all cases would not be making the best use of land/sites available.
- Unlike option 1, where impacts were positive, this option was found to have no impacts on some of the environmental objectives including biodiversity, SDNP, water quality, flood risk, reducing greenhouse gas emissions, climate change adaptation, and waste. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that option 2 would provide any further details or requirements on the issues.

### **Preferred Option**

- Option 1 has potential for positive impacts across a wider range of environmental objectives than options 2 and 3, where impacts are neutral, however this is because option 1 sets the strategy and covers a range of issues which are unlikely to be addressed further or repeated.
- Option 1 could be seen to be more flexible and this may have benefits for reducing vacancy, potentially having benefits for the historic built environment and making the best use of land.
- However, option 1 had more potential for adverse impacts for some of the social objectives when compared to options 2 and 3 and may have adverse effects for health, community safety and social inclusion. Both options 2 and 3 had potential for positive impacts for these objectives, with option 3 likely to result in more significant positive impacts. Both options 2 and 3 also had more potential for positive impacts for reducing the need to travel and access compared with option 1, as should enable community's to access facilities locally.
- Either option 2 or 3 are considered to be the preferred approach. If either option 2 and 3 are pursued, the policy could mitigate against potential adverse impacts through ensuring there is some flexibility to allow for adaptive re-use / change of use where redundancy can be proven, and/or where it may result in a historic building being brought back into active uses.

## Employment, Tourism and Retail

### CPP2 Options Appraisal: DM11 New Employment/Business Floorspace

- Option 1) No detailed development management policy to guide new employment/ business floorspace instead rely on guidance set out in strategic allocations; Policy CP2 Sustainable Economic Development as well as generic guidance in NPPF and NPPG.
- Option 2) Detailed development management policy to guide proposals containing new employment/ business floorspace

### Assumption

- Assume that option 2 will not repeat any policy of a strategic nature that is included in CPP1.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	Any new development could have impacts on biodiversity. CPP1 policy CP10 sets the strategic approach to biodiversity. This should ensure impacts of employment based development are positive for this objective. In addition, some of the strategic allocations have specific requirements relating to biodiversity.	0	Although employment based development could have adverse impacts on biodiversity, It is considered unlikely that this option will provide any further detail with regards to biodiversity as this is already provided at a strategic level by CPP1 policy CP10. No impacts anticipated
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	Any new development could have impacts on SDNP depending on its location. CPP1 policy SA5 sets the strategic approach to protecting the setting of the SDNP. This should ensure impacts of employment based development are positive impacts for this objective.	0	Although employment based development could have adverse impacts on the SDNP, it is considered unlikely that this option will provide any further detail with regards to protecting the SDNP as this is already provided at a strategic level by CPP1. No impacts anticipated
4. To protect and conserve the city's historic built environment, heritage assets and their	+	Any new development could have impacts on heritage assets depending on its location. CPP1 policy sets the strategic approach to protecting and enhancing heritage assets. This should ensure impacts of employment	0	Although employment-based development could have heritage impacts, it is considered unlikely that this option will provide any further detail with regards to protecting heritage assets as this is already provided at a strategic level by CPP1. No impacts anticipated

settings, townscapes, buildings and archaeological sites		based development are positive impacts for this objective.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	New employment based development could increase journeys made to and within the area. However can also help address issues with regards to out-commuting. CPP1 policy sets the strategic approach to sustainable transport and requires major development to submit transport assessments. In addition, some of the Strategic Allocations have specific requirements regarding sustainable transport. Impacts considered to be mixed.	-/+	Impacts considered to be the same as option 1. This option may provide the opportunity to address transport impacts arising from employment-based development if included in the policy.
6. To improve air and noise quality	-/+	Some employment uses can have air and noise quality impacts, relating to transport or the type of activity. Some of the Strategic Allocations have specific requirements regarding air quality although there are no references to noise nuisance in CPP1. Impacts considered to be mixed.	-/+	Some employment uses can cause noise nuisance. This option may have potential to address noise/air quality impacts arising from employment-based development, if included in the policy.
7. To improve water quality (ecological, chemical and quantity status)	+	Any new development could increase water consumption. CPP1 policy sets the strategic approach to minimising water consumption and preventing water pollution. This should ensure impacts of employment based development are positive impacts for this objective. In addition, some of the strategic allocations have specific requirements.	0	Although employment based development could increase water consumption, it is considered unlikely that this option will provide any further detail with regards to water as this is already provided at a strategic level by CPP1. No impacts anticipated
8. To reduce the risk from all sources of flooding to and from development	+	Any new development could be at risk of flooding or could increase flood risk elsewhere. CPP1 policy sets the strategic approach to flood risk. This should ensure	0	Although any type of development could be at risk of flooding or increase flood risk elsewhere, it is considered unlikely that this option will provide any further detail with regards to flood risk as this is already provided at a strategic level by CPP1.

		impacts of employment based development are positive impacts for this objective. In addition, some of the strategic allocations have specific requirements.		No impacts anticipated
9. To reduce emissions of greenhouse gases that cause climate change	+	Any new development could increase energy consumption. CPP1 policy sets the strategic approach to reducing carbon emissions. This should ensure impacts of employment based development are positive impacts for this objective. In addition, some of the strategic allocations have specific requirements.	0	Any new development could increase energy consumption. It is considered unlikely that this option will provide any further detail with regards to reducing carbon emissions as this is already provided at a strategic level by CPP1. No impacts anticipated
10. To increase the city's resilience and ability to adapt to climate change	+	CPP1 policy sets the strategic approach to adapting to climate change. This should ensure impacts of employment based development are positive impacts for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to climate change adaptation as is already provided at a strategic level by CPP1. No impacts anticipated
11. To improve soil quality	+	New development has the potential to remediate contaminated land. In addition, some of the strategic allocations have specific requirements. CPP1 policy sets requirements relating to reducing land pollution.	0	New development has the potential to remediate contaminated land. It is considered unlikely that this option will provide any further detail with regards to improving soil quality as is already provided at a strategic level by CPP1. No impacts anticipated
12. To minimise and sustainably manage waste	+	New development has the potential to increase waste. CPP1 policy sets requirements relating to minimising waste.	0	New development has the potential to increase waste. It is considered unlikely that this option will provide any further detail with regards to minimising waste as is already provided at a strategic level by CPP1. No impacts anticipated.
13. To make the best use of land available	-/+	The Strategic Allocations set the type and mix of uses that are expected on these sites. CP2 encourages a mix of employment floorspace across the city for various sectors. Whilst there is a policy on housing densities, that should ensure the best use of housing sites are made, there is no general policy in	+	This option has potential to have a positive impact on this objective as could help to make the best use of land in employment uses, e.g. through specific requirements to secure flexible development that can change according to market needs/requirements.

		place regarding making the best use of land which would apply to employment sites. Impacts are considered to be mixed.		
16. To improve health and well-being, and reduce inequalities in health	+	Employment-based development will increase employment opportunities. Access to employment is a wider determinant of health. This option is likely to have a positive impact on this aspect of the objective.	+	Impacts the same as option 1.
18. To increase equality and social inclusion	+	Employment-based development will increase employment opportunities. Access to employment opportunities could help to reduce social inequalities and reduce deprivation. In addition, some of the strategic allocations have specific requirements relating to training. Impacts likely to be positive.	+	Impacts the same as option 1.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	This option should help secure a range of employment based development, would support development of new and emerging sector and increase employment opportunities. This would have a significant positive impact on this objective.	++	This option would have similar impacts to option 1. In addition, this option could further support flexible employment development which can respond to future changing markets, may help reduce future vacancy rates and help to sustain economic development in the longer term, through more detailed policy requirements.

### Summary

#### Option 1 – CPP1

- This option was found to have potential for significant positive impacts for economic development, as this option should help to secure employment development and increase employment opportunities.
- This option was found to have positive impacts for a number of other objectives as CPP1 sets the strategic approach to addressing various issues associated with development including: biodiversity; SDNP; historic built environment; sustainable transport; water quality; flood risk; greenhouse gas emissions; climate change adaptation; soil quality; and waste. Some of the Strategic Allocations also have specific requirements relating to some of these issues.

- This option was also found to have positive impacts for health, as employment is one of the wider determinants of health; and social inclusion through potential to reduce employment deprivation.
- This option was found to have potential for mixed (-/+ ) impacts for the objectives for air/noise quality as although CPP1 sets the strategy to help reduce air quality impacts, it does not contain requirements relating to noise nuisance which can be associated with employment-based development; and making the best use of land, as although CPP1 Strategic Allocations requires a certain mix and amount of floorspace to be delivered on sites, it does not contain a generic policy that would ensure the best use of employment sites are made.

### **Option 2 – DM policy to guide proposals**

- This option was found to have potential for significant positive impacts for economic development. In addition to impacts resulting from CPP1, this option could result in delivery of more flexible employment development and have longer term benefits in terms of responding to potential changes in the market.
- This option was found to have potential for positive impacts for health, with access to employment being a determinant of health; and social inclusion, through the potential to reduce employment deprivation.
- Similarly to option 1, this option was found to have mixed impacts for transport and air/noise quality. Employment based development may come forward through this policy, potentially having transport, air and noise quality impacts, however the policy may provide the opportunity to address this issue.
- Unlike option 1, where impacts were mixed, this option was found to have potential for more positive impacts making the best use of land, as this option could help secure better use of land through more flexible development.
- Unlike options 1, where impacts were positive, this option was found to have no impacts on objectives for the biodiversity, SDNP, heritage, water quality, flood risk, reducing greenhouse gas emissions, climate change adaptation, soil quality, and waste. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that option 2 would provide any further details or requirements on the issues.

### **Summary/Preferred Option**

- Option 1 has potential for positive impacts across a wider range of objectives than option 2, however this is because option 1 sets the strategy and covers a range of issues which are unlikely to be addressed further or repeated.
- Both options 1 and 2 have potential for some mixed impacts, including transport and air/noise quality.
- Option 2 has potential for greater positive impact than option 1 for some objectives, including ensuring the best use of land, and supporting long term economic growth through delivery of more flexible workspace, which are the key objectives for this topic area. However, this will be dependent on the content of the policy.
- Option 2 is likely to be the preferred approach for this topic area.

**CPP2 Options Appraisal: DM12 Primary, Secondary and Local Shopping Frontages**

**Options Appraisal**

- Option 1) No policy framework to guide new and appropriate uses within the Primary, Secondary and Local Shopping Frontages of the Regional, Town/District and Local Centres
- Option 2) Criteria based policy to assess changes of use within the Primary, Secondary and Local Shopping Frontages of the Regional, Town/District and Local Centres
- Option 3) Have a single policy to assess changes of use for all retail areas.

<b>SA Objective</b>	<b>1</b>	<b>Summary of Effects</b>	<b>2</b>	<b>Summary of Effects</b>	<b>3</b>	<b>Summary of Effects</b>
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	This option could result in mixed impacts for this objective. It could result in a wider mix of uses in centres, and particularly in local/town centres, may help people meet their needs locally and reducing their need to travel having position impacts. However, this could also result in a lack of A1 uses and result in a predominance of any one type of uses, e.g. A5 uses meaning that people have to travel further to access a wider mix.	+	This option should result in positive impacts for this objective. It should result in a balanced mix of A uses, appropriate for the type of centre. In particular, it should help to maintain a balanced mix of A uses within local and town/district centres allowing people to meet their needs locally and reducing the need to travel for day-to-day needs.	?	It is uncertain what effect this option would have on this objective and would be dependent on whether the restriction of change of use was higher, e.g. allowing less COU to maintain a higher predominance of A1 uses, or allowing a higher proportion of changes of use and a greater mix of A uses. For example, although allowing less COU would be more appropriate in the regional centre, this would be less appropriate in a town/local centre where a wider mix of uses would help people meet their needs locally and reduce the need to travel to other centres.
13. To make the best use of land available	+	There would be no restriction on change of use with this option and this is the most flexible approach. This option may help to prevent against vacancy as any use would be	+	This option would prevent a certain amount of changes of use within the retail centres, and would be different in accordance with the type of retail centre. This	?	It is uncertain what impact this option will have on this objective and would depend on the level of the restriction on change of use.



		permitted, which would help make the best use of land available. Impacts should be positive.		may result in some vacant units, e.g. if the use is no longer viable in that location. However, based on the generally low vacancy rates in the city's retail centres, this is considered unlikely to be an issue in reality. Maintaining a balanced mix of uses within each of the retail centres could also be considered as making a good use of the land available. Impacts should be positive.		
15. To improve the range, quality and accessibility of services and facilities.	-/+	This option could result in mixed impacts for this objective. It could result in a wider range of uses in centres, and particularly in local/town centres, may help improve access to services locally. However, this could also result in a lack of certain uses e.g. A1 and result in a predominance in any one type of uses, e.g. A5 uses resulting in less range and the need to travel to access a wider mix.	+	This option should result in positive impacts for this objective. It should result in a balanced mix of A uses, appropriate for the type of centre, which will help maintain access to these uses. In particular, it should help to maintain a balanced mix of A uses within local and town/district centres allowing people to access a mix of uses.	?	It is uncertain what effect this option would have on this objective and would be dependent on whether the restriction of change of use was higher, e.g. allowing less COU to maintain a higher predominance of A1 uses, or allowing a higher proportion of changes of use and a greater mix of A uses. For example, although allowing less COU would be more appropriate in the regional centre, this would be less appropriate in a town/local centre where a wider mix of uses would help people access a wider range of services.
17. To improve community safety, and reduce crime and fear of crime	-/+	This option could result in mixed impacts for this objective. It could result in a wider range of uses in centres, and particularly in	+	This option should result in positive impacts for this objective. It should help to maintain a balanced mix of uses appropriate	?	It is uncertain what effect this option would have on this objective and would be dependent on whether the proportion of restriction of change of

		local/town centres, which could help improve vitality, footfall and activity in the centre, contributing to reducing the fear of crime. However, this option could also result in a predominance in any one type of use, e.g. A5 use, resulting in less vibrancy and activity, and may increase the fear of crime.		to the type of retail centre. This should help to ensure centres remain vibrant and therefore help reduce the fear of crime and support community safety through maintaining footfall and activity.		use. E.g. a higher restriction in a local centre may result in a less vibrant local centre, and this could increase fear of crime through reduced footfall. However, overall impacts are uncertain.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	-/+	This option could result in mixed impacts for this objective. It could result in a wider range of uses in centres, which may be particularly useful in local/town centres as may help to maintain their economic vitality. However, this option could also result in a predominance in any one type of use, e.g. A5 use, resulting in less vibrancy and activity, and would be of particular detriment to the Regional Centre and the local retail economy, which is a significant contributor to the wider economy.	++	This option should have significant positive impacts on this objective. It should help maintain a balanced mix of uses within all retail centres, that is appropriate to the type of centre and therefore help to maintain vibrancy, footfall and activity. Brighton is the regional shopping centre for the wider area and the retail economy is a significant part to the overall economy, provided largely by the Regional Centre. It is imperative that the Regional Centre continues to provide a high proportion of A1 uses in order to maintain this status, and this option will enable change of use to be managed in accordance with this status, as well as enabling other centres to offer a wider mix of A uses.	-	This option does not differentiate between the different retail areas, and would have one policy to assess changes of use, regardless of which type of retail area they are in. This would likely to be detrimental towards this objective, and depending on the proportion of change of use allowed, would be unlikely to achieve an appropriate balance and may result in loss of A1 units where these are vital to the economy (e.g. in the Regional Centre) or may result a higher proportion of A1 uses in local centres where a different use may be preferred. Overall impacts are considered to be adverse.

## Summary

### Option 1 – no policy

- This option was found to have positive impacts on the objective for making the best use of land. This option is the most flexible approach and may help to prevent any potential vacancy, helping to make the best use of land, through allowing any changes of use to occur.
- This option was found to have mixed positive and negative impacts on all other relevant objectives, including reducing the need to travel, improving access to services, improving community safety and economic development. It could have positive impacts on these objectives as by allowing any change of use could result in a greater mix, which may help people meet their needs locally and access services, particularly in local centres, could increase footfall and vitality, supporting economic development and community safety; however conversely could result in a reduced mix and predominance in one type of use having the opposite effects.

### Option 2 – policy covering each type of retail centre separately

- This option was found to have significant positive impacts on the objective for economic development. This option reflects the different roles that the various centres have including the importance of the Regional Centre to the local economy. It should help to maintain a balance of uses that is appropriate to the different type of centre and therefore help maintain and improve vibrancy, vitality and footfall.
- The option was found to have positive impacts on all other relevant objectives, including reducing the need to travel, improving access to services, improving community safety and making the best use of land. Through maintaining a balanced mix of uses appropriate to the type of centre, in particular local and town/district centres will enable people to meet their needs locally, access services and reduce the need to travel. Maintaining a balanced mix should also ensure the centres remain vibrant and attract people for various purposes which can help improve community safety through activity. This option should also help prevent a predominance of any one type of use, and therefore supports making the best use of land.

### Option 3 – policy covering retail areas together

- This option was found to have adverse impacts on the objective for economic development. Not differentiating between the different retail areas may be detrimental towards economic development and would be unlikely to achieve an appropriate balance for each type of centre. E.g. may result in loss of A1 units where these are vital to the economy (e.g. in the Regional Centre) or may result a higher proportion of A1 uses in local centres where a different use may more useful.
- This option was found to have uncertain impacts for all other relevant objectives including reducing the need to travel, improving access to services, improving community safety and making the best use of land. The uncertainty is based on not knowing what approach would be taken, e.g. if a greater proportion of change of use were allowed, then this could be of detriment to the Regional Centre but may benefit local centres, whereas if a lower proportion of change of use were allowed, then this could benefit the Regional Centre but may be of detriment to other centres. Without knowing what approach would be taken, results in a high degree of uncertainty.

### Preferred Option

- Option 2 is the preferred approach. In particular, this option should have a significant positive impact on the key objective for this topic area: economic development. This option should result in a balanced mix of A uses that is appropriate to the type of retail centre and recognises the importance of maintaining a predominance of A1 uses the regional centre, helping to maintain economic vitality, vibrancy and footfall, having economic benefits, as well as contributing to community safety; may help to reduce the need to travel and improve access to services; and could help to make the best use of land available.

### CPP2 Options Appraisal: DM13 Important Local Parades (ILPs), Neighbourhood Parades and Individual Shop Units -

#### Options Appraisal

- Option 1) No policy framework to guide new and appropriate uses within ILPs, Neighbourhood Parades or individual shop units
- Option 2) Criteria based policy to assess changes of use within ILPs, Neighbourhood Parades or individual shop units
- Option 3) Have a single policy in CPP2 covering all retail areas

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	This option may result in a loss of certain types of units within ILPs and NPs reflecting market conditions and result in an imbalance of uses. This may impact upon a community's ability to meet their day to day needs locally and increase the need to travel having potential for adverse impacts.	+	This option should ensure an appropriate balance of uses is maintained in ILPs and NPs, enabling community's to meet their day to day needs easily and reduce the need to travel.	-/+	This option would result in a generic policy applicable to all retail areas having positive impacts. However more generic guidance may not reflect the special nature of what is required in ILPs or NPs and may result in some need to travel for communities to meet their day to day requirements. Impacts mixed.
6. To improve air and noise quality	-	As described under objective 5, this option could result in loss of local services, could result in an imbalance of uses, and increase the need to travel, potentially impacting upon air	+	As described under objective 5, this option could reduce the need to travel having benefits for air quality, through ensuring an appropriate balance of uses within ILPs and NPs.	-/+	As described under objective 5, a generic policy may not reflect the special nature of what is required in ILPs and NPs. Impacts mixed.

		quality.				
13. To make the best use of land available	-	This option could result in an imbalance of uses within ILPs and NPs, with a predominance of certain uses reflecting market conditions. This would not make the best use of building stock.	++	This option should result in a balanced mix of uses in ILPs and NPs which would help to make the best use of land/building stock.	+	Generic policy could ensure a balance of uses is maintained, however may not reflect the special nature of NLPs and ILPs, therefore missing opportunities to secure significant positive impacts.
15. To improve the range, quality and accessibility of services and facilities.	-	This option could result in an imbalance of uses within ILPs and NPs, with a predominance of certain uses reflecting market conditions. This may impact upon a community's ability to meet their day to day needs locally and to access services.	++	This option should result in a balanced mix of uses in ILPs and NPs which should help enable local community's to access services and meet their day to day needs locally.	+	Generic policy could ensure a balance of uses is maintained to support a local community's needs, however may not reflect the special nature of NLPs and ILPs, therefore missing opportunities to secure significant positive impacts.
17. To improve community safety, and reduce crime and fear of crime	?	Shops and other uses in ILPs and NPs contribute towards activity in an area and therefore provide passive surveillance and supports community safety. This option may result in loss of certain types of units, which could result in lower footfall and less passive surveillance. Impacts on this objective are uncertain.	+	This option should help to maintain a balanced mix of uses within ILPs and NPs. Having a variety of uses can increase footfall to an area, can increase opportunities for passive surveillance and supports community safety. Impacts should be positive.	+	Although this option may not reflect the special nature of ILPs and NPs this option should provide generic guidance on mix of uses. This should help to ensure there is some balance of uses, should support activity within ILPs and NPs thus providing opportunities for passive surveillance and community safety.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local	+	This option provides the most flexible approach and allows the market to decide. This could help bring forward applications and may reduce the risk of vacant units, however could inhibit applications as provides no clarity or certainty to applicants. Overall impacts should	+	This option is considered to be the least flexible approach, however provides clarity for applicants which could help to bring forward successful applications. This option should also ensure there is not a predominance of any type of use, which should help to increase	+	This option provides generic guidance for all retail areas, and although this may not reflect the special nature of ILPs and NPs, this should provide clarity for applicants and may help to bring forward applications. This option should also help to ensure there that isn't a predominance on one type of

employment needs.		be positive.		footfall. Overall impacts should be positive.		use. Overall impacts should be positive.
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## Summary

### Option 1

- This option has potential for positive impacts on the objective for economic development. This is the most flexible approach and would let the market decide which could benefits for economic development.
- This option has potential for adverse impacts on objectives for reducing the need to travel, air quality, making the best use of land and increasing access to services. This option may result in an imbalance of uses, which would not making the best use of building stock, and potentially increasing the need for people to travel to access services.
- This option has the potential for uncertain impacts on objectives for community safety. This option may result in loss of certain types of units, which could result in lower footfall and less opportunities for passive surveillance.

### Option 2

- This option has potential for significant positive impacts on making the best use of land and increasing access to services. This option should ensure an appropriate mix and balance of uses is maintained in ILPs and NPs, helping to make the best use of building stock. A balance of uses should also ensure people to access services locally.
- This option has potential for positive impacts on reducing the need to travel and air quality. This option should result in a balance of uses within ILPs and NPs which should enable people to access local services, this reducing the need to travel and having positive impacts for air quality.
- This option also has potential for positive impacts on community safety. Maintaining a balance mix of uses within ILPs and NPs should help to support increased footfall which offers opportunity for passive surveillance.
- This option also has potential for positive impacts on economic development. Although this option is less flexible and more prescriptive than other options, it provides certainty to applicants and may help to bring forward successful applications. It should also prevent a predominance of any one type of use.

### Option 3

- This option has potential for positive impacts on making the best use of land and increasing access to services. A generic retail policy should help to maintain some balance of mix if uses, helping to make the best use of land and enabling communities to access local services, although it is recognised that these may not reflect the special nature of ILPs and NPs.

- This option also has potential for positive impacts for community safety and economic development. This option provides some clarity to applicants which may help to bring forward applications and should result in active ILPs and NPs, thus enabling passive surveillance.
- This option is considered to have potential for mixed (adverse/positive) impacts on reducing the need to travel and air quality. A generic retail policy should help to maintain some balance of mix of uses, helping to reduce the need to travel for some journeys, however these may not reflect the special nature of what is required in ILPs and NPs and may result in the need to travel elsewhere for certain services.

### Preferred Option

- Option 2 has the most potential for positive impacts, with some impacts having potential to be significant. In particular, this option should help to make the best use of land, through ensuring a balanced mix of uses required in ILPs and NPs, should enable local communities to access services and meet their needs locally, helping to reduce the need to travel, having benefits for air quality. Having a balanced mix of uses should support economic development and facilitate footfall to an area, having benefits for community safety.

### CPP2 Options Appraisal: DM14 & DM15 Brighton Marina & Brighton Seafront

#### Options Appraisal

- Option 1) No policy framework to guide new and appropriate uses (*including change of uses*) within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1) and within seafront but rely on NPPF and high level policies CP4 (Retail Provision) and DA2 (Brighton Marina, the Gas Works and Black Rock Area) and SA1 The Seafront in CPP1
- Option 2) Criteria based policies to assess changes of use within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1) and within seafront (SA1)
- Option 3) Have a single general policy in CPP2 covering retail frontage and changes of use

#### Assumptions/Explanation:

- This policy will ultimately guide retail (A1-A5) development in the Marina and not other uses.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	DA2 (Inner Harbour) supports delivery of 5,000sqm of retail floorspace which could have impacts on biodiversity.	0	This option only deals with changes of use within the Marina Inner Harbour and not new development. This would not be	0	This option only deals with changes of uses across the city and not new retail development. This would not be anticipated to have any impacts on

		CPP1 policy CP10 sets the strategic approach to biodiversity. This should ensure impacts of retail based development are positive for this objective. In addition, DA2 has specific requirements relating to biodiversity.		anticipated to have any impacts on biodiversity.		biodiversity.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	New retail development in the Marina/seafront could increase journeys to the area as it increase its attractiveness as a shopping destination. Retail development could also help to ensure the needs of communities in the vicinity can be met locally, provided that a balanced mix of uses is delivered. However, this option currently does not provide guidance on the mix of A uses and the loss of the district centre designation means that the marina is not listed within the hierarchy of define centres. Impacts could be adverse as could lead to an increase in transport movements both to and from the marina.	-/++	As with option 1, new retail development in the Marina/seafront could increase journeys to the area. However, this option should provide clarity on the mix of A uses that would be acceptable and this may ensure the mix enables the day to day needs of local communities can be met locally reducing the need to travel. This will become increasing important and more significant in the long term once the anticipated quantum of housing is delivered in the Marina. Impacts mixed but with potential to be significantly positive.	-/+	This option would provide generic guidance on the mix of retail uses to be provided across the city, having positive impacts. However it would be unlikely to adequately reflect the special nature of the Marina and may result in a mix that is not appropriate to the Marina location, resulting in people travelling to meet their needs.
6. To improve air and noise quality	-	Retail uses could have air quality impacts, relating to transport movements. See Objective 5.	-/+	Retail uses could have air quality impacts, relating to transport movements. See Objective 5.	-/+	Retail uses could have air quality impacts, relating to transport movements. See Objective 5.
8. To reduce the risk from all sources of flooding to and from development	-	The Inner Harbour and seafront area is located within Flood Zones 2 and 3a (medium and high probability of flooding). Retail development could	-	New retail development could still come forward in the Marina/seafront with this option, e.g. through change of use, which	0	Generic policy on retail frontages and change of use not anticipated to have any impact on this objective.



		therefore be at risk of flooding in this location, however it is recognised that retail development is considered to be a less vulnerable use than other uses.		would still be vulnerable to flood risk due to its location.		
10. To increase the city's resilience and ability to adapt to climate change	-	The Inner Harbour area is located within Flood Zone 3a (high probability of flooding) which is likely to increase with climate change. Retail development could therefore be at risk of flooding in this location, however it is recognised that retail development is considered to be a less vulnerable use than other uses.	-	New retail development could still come forward in the Marina/seafront with this option, e.g. through change of use, which would still be vulnerable to flood risk and the impacts of climate change due to its location.	0	Generic policy on retail frontages and change of use not anticipated to have any impact on this objective.
13. To make the best use of land available	+	This option should help to regenerate the Marina and seafront areas and potentially may help to reduce vacancy rates having positive impacts on this objective. However may result in an imbalance in the mix of uses and this would not fully make the best use of land available.	++	This option has potential for significant positive impact as should help to define the mix of uses that would be acceptable at the Marina/seafront and may prevent a predominance of any one kind of use. This would have positive impacts for this objective as would help to create a balanced mix of uses, making the best use of land available.	+	This option would provide generic guidance on the mix of retail uses to be provided across the city, and should help to make the best use of land available. However a generic policy would be unlikely to adequately reflect the special nature of the Marina and opportunities to make the best use of the land may be missed.
15. To improve the range, quality and accessibility of services and facilities.	+	DA2 (Inner Harbour) supports delivery of 5,000sqm of retail floorspace. This will increase the availability of A uses within the Marina having positive impacts for this objective. However, this option does not provide further guidance	++	This option has potential for significant positive impact as should help to define the mix of uses that would be acceptable at the Marina/seafront and may prevent a predominance of any one kind of use. This should help	+	This option would provide generic guidance on the mix of retail uses to be provided across the city which should have positive impacts for this objective. However, this may result in a mix that is not appropriate to the Marina/seafront location and may

		on the appropriate mix of A uses to be delivered and may result in an imbalance or predominance of certain type of use, impacting on people's ability to access services to meet their day to day needs locally.		to ensure that people's day to day needs can be met locally, which will become increasingly important in the future as the anticipated quantum of housing is delivered.		impact on people's ability to meet their day to day needs locally.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	This option is considered to be the most flexible approach and will let the market decide. This may reduce the risk of vacancy as units are filled, however does not provide any certainty or clarity for applicants and may result in speculative applications that may not be appropriate, or may result in a predominance of one type of unit, with increased competition. Overall, impacts should still be positive for this objective.	+	This option is considered to be the least flexible and may result in vacant units. However, this option would provide certainty and clarity for applicants which may help bring forward applications and may also help to ensure there is a balance of uses and no single predominance, reducing competition between units and allowing individual units to thrive. Overall impacts should be positive.	+	This option is also considered to be fairly flexible as will be more generic and less specific to the Marina and allow the market to decide. This may help to reduce the risk of vacancy. However, this may result in a mix of uses that does not reflect the special nature of the Marina. Overall impacts should be positive for this objective.

## Summary

### Option 1 – no policy

- This option had potential for positive impacts on making the best use of land, increasing access to services and economic development. This option may contribute towards regeneration of the Marina/seafront, is considered to be flexible in allowing the market to decide which may help to reduce vacancy rates and make the best use of land available and also have economic benefits. As this option should increase retail provision at the Marina/seafront, this will help to increase access to services however it is recognised that there would be no guidance on appropriate mix which may result in a reduced range.
- This option also had potential for positive impact on biodiversity, reflecting the requirements relating to biodiversity within DA2.
- This option had the potential for adverse impacts on reducing the need to travel and air quality. New retail development could increase the attractiveness of the Marina as a shopping destination, increasing journeys. Additionally, lack of guidance on mix of uses may result in an imbalanced mix which may impact on the growing local community's ability to meet their day to day needs locally and increase the need to travel.
- This option also had the potential for adverse impact on flood risk and climate change adaptation reflecting this risk of flooding in this location.

### **Option 2 – policy for the Marina/seafront**

- This option had potential for significant positive impacts on making the best use of land and increasing access to services. This option should help to define the mix of uses that would be acceptable at the Marina/seafront, may prevent a predominance of any one kind of use and help to create a balanced mix of uses. This would help to make the best use of land available and should help to ensure that people's day to day needs can be met locally which will become increasingly important as the local community increases.
- This option had potential for positive impacts for economic development. Although this option is considered to be the least flexible, it will provide certainty for applicants, which may help to bring forward applications and should also prevent predominance in any one type of use, increasing the attractiveness of the Marina/seafront.
- This option had potential for mixed (adverse/positive) impacts on reducing the need to travel and air quality. New retail development, including changes of use could increase journeys to the area as the attractiveness of the area increases as a destination, however should also provide clarity on the mix of A uses that would be acceptable, enabling the day to day needs of local communities to be met locally. Positive impacts on reducing the need to travel for some journeys could be significant.
- This option also had the potential for adverse impact on flood risk and climate change adaptation reflecting this risk of flooding in this location.

### **Option 3 – generic policy on change of use and retail frontage**

- This option had potential for positive impacts on making the best use of land, increasing access to services and economic development. This option would provide generic guidance on the mix of retail uses to be provided across the city, and should help to make the best use of land available; should help to increase the range of retail units and help people to access these services, and will result in a fairly flexible approach that may help to reduce vacancy rates, supporting economic development. However this may result in a mix of uses that doesn't reflect the special nature of the Marina, not the needs of the local community and the opportunity to result in significant positive impacts for these objectives would be missed with this option.
- This option had potential for mixed (adverse/positive) impacts on reducing the need to travel and air quality. New retail development, including changes of use could increase journeys to the area as the attractiveness of the area increases as a destination, however should also provide clarity on the mix of A uses that would be acceptable, enabling the day to day needs of local communities to be met locally. However, the positive impacts may not be as significant as option 2 as may result in a mix of uses that does not reflect the special nature of the Marina/seafront.
- This option also had the potential for adverse impact on flood risk and climate change adaptation reflecting this risk of flooding in this location.

### **Preferred Option**

- Option 2 is considered to be the preferred approach. This option should help deliver a range of uses that reflects the special nature of the Marina/seafront locations, should help to bring about a range of uses that will contribute towards ensuring people can meet their needs locally which will become increasingly important as the Marina population increases, may help to reduce the predominance in any one type of use increasing the attractiveness of the Marina as a destination, and should bring certainty for applicants.

**CPP2 Options Appraisal DM16 PERMANENT MARKETS**

**Options**

- 1) No policy framework to assess permanent market applications
- 2) Criteria based policy to assess new permanent markets or extensions to existing markets with no preferred sites identified
- 3) Pro-active policy with appropriate permanent market sites identified

**Assumptions:**

- Open regularly, which could be daily, weekly or fortnightly.
- Could be in an indoor (or semi-indoor) structure or on-street (if structures remain up overnight).
- Likely to be located in or near an established retail centre (e.g. local centre, district centre, town centre).
- Would consist predominantly of a mixture of A1 and A3 uses.
- Temporary or pop-up markets do not require planning permission and are not covered by this policy.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
4. To protect and conserve the city’s historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-?	Lack of policy framework could result in markets in unsuitable locations, including those which have adverse impacts on heritage asset, although CPP1 policies provide some protection against this. Overall effects are adverse and uncertain and would depend on the site coming forward.	0/+?	The inclusion of criteria which supports the integration of new development into the historic environment and results in enhancements/restoration to heritage assets could result in a positive effect. The inclusion of criteria that discourages development within heritage assets would have a neutral effect. Overall effects are uncertain.	0/+?	If this option identified sites for markets which avoided heritage assets, then this option could avoid an adverse effect and have a neutral effect. If this option identified sites within or which impacted upon heritage assets, then this may need to be accompanied by criteria which required enhancement /improvement of heritage assets in order to result in a positive effect. Overall effects are uncertain.
5. To reduce the need to travel by car, encourage	0	A market development could increase transport movements. However, the assumed location of	+?	The assumed location of permanent markets is within existing centres most of which	+?	The identification of sites for markets in good proximity to sustainable transport and/or where

travel by sustainable forms of transport and improve travel choice		<p>permanent markets is within existing centres and therefore development is likely to be located where sustainable transport access is already good.</p> <p>The lack of a policy framework is not considered to have any impact on this objective.</p>		<p>have good sustainable transport access. A criteria based policy could provide the opportunity to encourage development to be situated in sustainable locations, which would maximise beneficial effects on this objective. Effects are also uncertain until criteria are known.</p>		<p>other leisure/retail activity is taking place (in order to maximise the benefits of co-location), could have a positive effect on this objective. Conversely, the identification of sites without good sustainable transport access could have an adverse effect although this is considered unlikely given that the assumed location of developments is within existing centres. Effects are uncertain until sites are known.</p>
6. To improve air and noise quality	-?	<p>An increase in traders' vehicle movements would be associated with a market development and this could have effects on air quality that would need consideration, particularly within the AQMA. Markets could generate a certain amount of noise and consideration on residential amenity may be required depending on the site. Lack of a policy framework may result in greater adverse effects on these issues.</p>	-?	<p>A market development could increase transport movements which could affect air quality. The inclusion of criteria which supports market development close to where sustainable transport access can be maximised would help to minimise air quality impacts, however there may still be air quality impacts arising from trader's vehicles. A market could also have noise impacts. The inclusion of criteria to ensure the market is compatible with surrounding uses would help to minimise risk of noise impacts.</p>	-?	<p>The identification of sites with good proximity to sustainable transport could help avoid an adverse impact on air quality. However, as discussed, there would be an increase in trader's vehicle movements to service the market which could have air quality impacts and this could be an issue within the AQMA. The identification of sites away from residential areas where there could be a noise issue, would help to avoid an adverse impact regarding noise issues.</p>
13. To make the best use of land available	-	<p>There is no existing policy framework as such that promotes development of derelict or</p>	+?	<p>The inclusion of criteria which encourages the regeneration of derelict areas/sites or</p>	+?	<p>The identification of sites for markets could help to regenerate derelict areas or could bring back</p>

		previously developed land, nor that promotes the re-use of vacant buildings. Therefore the lack of a policy framework could have an adverse effect on this objective.		encourages reuse of vacant buildings could result in a positive effect on this objective. Effects are also uncertain until criteria are known.		into use vacant buildings, having potential for positive effect. This would depend on the site identified and therefore effects are uncertain.
15. To improve the range, quality and accessibility of services and facilities.	0	The assumed location of permanent markets is within or near to existing centres and therefore development is likely to be located where access is already good.  The lack of a policy framework is not considered to have any impact on this objective.	++	Permanent markets would increase the range of retail offer in an area and therefore having a policy on markets would have a positive effect on this objective. In addition, a criteria based policy could provide the opportunity to encourage development to be situated in sustainable locations, which would maximise beneficial effects.	++	Permanent markets would increase the range of retail offer in an area and therefore having a policy on markets would have a positive effect on this objective. The identification of sites for markets in good proximity to sustainable transport and/or where other leisure/retail activity is taking place (in order to maximise the benefits of co-location), would maximise beneficial effects.
16. To improve health and well-being, and reduce inequalities in health	0	Although the lack of a policy framework is not considered to have any impact on this objective, not having a policy provides no opportunity to maximise the health effects that market development could bring.	+	Permanent markets would increase the range of retail offer in an area, including food, and therefore having a policy on markets would have a positive effect on this objective through improving access to food regardless of the criteria the policy contains. Markets also provide the opportunity for community interaction which can have a positive effect on health.	+	Regardless of the sites identified, permanent markets would increase the range of retail offer in an area, including food, and therefore having a policy on markets would have a positive effect on this objective through improving access to food. Markets also provide the opportunity for community interaction which can have a positive effect on health.
17. To improve community safety,	0	The lack of a policy framework is not considered to have any impact	?	A market development could provide the opportunity for	?	A market development could provide the opportunity for greater

and reduce crime and fear of crime		on this objective.		greater community interaction and could help to regenerate areas. This may help to improve community safety although is fairly uncertain.		community interaction and could help to regenerate areas. This may help to improve community safety although is fairly uncertain.
18. To increase equality and social inclusion	0	The lack of a policy framework is not considered to have any impact on this objective.	?	A market development would provide opportunities for employment. This could help to reduce deprivation, however would depend on take-up by deprived communities and is therefore fairly uncertain.	?	A market development would provide opportunities for employment. This could help to reduce deprivation, however would depend on take-up by deprived communities and is therefore fairly uncertain. The location of a market in areas of greater deprivation may help to maximise positive effects on this objective.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	-	Markets can also be the catalyst to draw services into an area, can help to regenerate areas and can increase footfall to an area, all of which would have economic benefits, as well as providing employment opportunities. The lack of a policy framework could therefore have an adverse effect on this objective as may prevent this type of development from coming forward.	++	As described under Option 1, markets can have numerous economic benefits. A policy on permanent markets is considered to have significant positive effects on this objective as would help to provide confidence to applicants and may help to bring development forward.	++	As described under Option 1, markets can have numerous economic benefits. A policy on permanent markets, which includes the identification of sites, is considered to have significant positive effects on this objective, as would help to provide confidence and certainty to applicants, and is likely to help bring sites forward. Impacts on this objective are likely to be more significant with this option, than with option 2.

## Overall Summary

### Option 1

- The lack of a policy framework does not have any impact on a range of sustainability objectives. This is mainly due to matters being covered by existing CPP1 policies, such as policies covering sustainable buildings, and due to assumption on where markets would be developed, such as the objectives on biodiversity, open space, the SDNP, travel and accessibility.
- Objectives whereby this option could have an adverse effect include those on air/noise quality and economic development, due to the potential for an increase in transport movements, the potential for noise nuisance and due to the less certain position for applicants with regards to market development.
- There are no objectives where this option performed better than other options.
- Objectives where this option performed worse than other options include those on making the best use of land and economic development.
- Not having a policy framework may prevent this type of development from coming forward, and opportunities which could maximise positive effects, such as for health and economic development, could be lost.

### Option 2

- It is assumed that matters that are already addressed by CPP1 policies would not be repeated in a criteria-based market policy, and therefore, as with Option 1, this option has no impact on objectives linked to sustainable buildings. In addition, due to the assumption on where markets would be developed, this option had no impact on some objectives including biodiversity, open space and the SDNP.
- This option could have an adverse effect on the objective for air/noise quality, based on the possible increase in transport movements, particularly those of traders, and the potential for noise nuisance if markets are developed alongside more sensitive uses. Criteria could help to address noise issues.
- Objectives whereby this option is likely to have a positive effect include access to services, health and economic development, as market development would increase the retail on offer, could improve access to food and promote community interaction having health benefits, and would provide various economic benefits to the wider area as well as providing job opportunities.
- Objectives where the impact could be positive but would depend on criteria covering these issues and is therefore also uncertain include heritage, travel and best use of land. Criteria would need to encourage development with good sustainable transport access and encourage regeneration of vacant or derelict sites and/or heritage assets in order to maximise positive effects on these objectives.
- Development of clear criteria would result in a more certain effect for some objectives and could reduce the likelihood of adverse impact, e.g. through consideration of air quality and noise issues.

### Option 3

- It is assumed that matters that are already addressed by CPP1 policies would not be repeated in a detailed market policy, and therefore, as with Options 1 and 2, this option has no impact on objectives linked to sustainable buildings. In addition, due to the assumption on where markets would be developed,



this option had no impact on some objectives including biodiversity, open space and the SDNP although the identification of sites, could provide greater certainty for some objectives, e.g. avoidance of sites with biodiversity importance.

- As with option 2, this option could have an adverse effect the objective for air/noise quality.
- As with option 2, this option could have a positive effect on access to services, health and economic development. The effects on economic development are potentially more significant as the identification of sites would provide greater confidence to applicants and may help bring development forward.
- As with option 2, this option could have a positive effect, but would depend on both the contents of the policy and site identified and is also therefore uncertain, on objectives for heritage assets, travel, and best use of land. In addition, this option could also have a positive effect on reducing flood risk and/or improving soil quality if the sites identified avoided areas of flood risk and/or resulted in remediation of contaminated land.
- Identification of sites and development of detailed policy would result in a more certain effect for some objectives and could also reduce the likelihood of adverse impacts, e.g. through consideration of air quality and noise issues.

### **Preferred Option**

- Both Options 2 and 3 performed equally well against a range of sustainability objectives.
- There is uncertainty against a number of objectives, which could be clarified through the development of criteria and/or through the identification of sites.
- Option 3 could result in greater positive impact than option 2 on some objectives, including those relating to heritage, flood risk and soil quality, although this would depend on the site identified.
- Option 3 could result in more significant economic benefits than Option 2 due to the greater certainty created by identifying sites.
- Either options 2 or 3 are considered to be the preferred approach.

### **CPP2 Options Appraisal: DM17 Visitor Accommodation**

#### **Options Appraisal**

- Option 1) No additional policy to manage visitor accommodation in the city and no further hotel site allocations; no reduction in Hotel Core Zone; no reference to safeguarding large scale conference and banqueting facilities within existing Hotels. (E.g. CPP1 CP6 only).
- Option 2) Identify sites suitable for hotels to meet the high growth forecast demand for new hotels over the plan period; amend Hotel Core Zone and include policy provision safeguarding large scale conference and banqueting facilities within existing Hotels and include reference to short term lets in the Retaining Housing policy
- Option 3) Additional policy identifying opportunity areas for search for new hotels guided by low growth forecast; update Hotel Core Zone; include policy provision in CPP2 to safeguard large scale conference and banqueting facilities within existing Hotels and reference to short term lets in the Retaining Housing policy

## Assumptions

- Assume development would come forward with all options in order to make judgement for site based objectives.
- Assume development with option 1 would be within central Brighton area (CP6.1)
- Location of site allocations under option 2 is unknown and could be anywhere in the city.
- High growth scenario under option 2 equates to 10 sites.
- Opportunity areas under option 3 would include existing CPP1 strategic allocations.
- Low growth forecast under option 3 equates to 5 sites.
- Amendment to HCZ would take in two additional hotels on the seafront in Hove adjacent to the existing HCZ.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	0/+	This option would rely on CPP1 CP6 which firstly directs new hotel development to central Brighton. This area does not include any biodiversity designations and therefore development in this location is unlikely to have any impacts on biodiversity, and could achieve net gains.	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites which have biodiversity interest, potentially having adverse effects. Effects are also uncertain until sites are known.	0/-	This option identifies opportunity areas within existing CPP1 strategic allocations. Although none contain biodiversity designations, some are adjacent to designated site and could result in adverse impacts. T
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	This option would rely on CPP1 CP6 which firstly directs new hotel development to central Brighton. It is considered unlikely that development would result in loss of designated open space within this area. Impacts are considered neutral.	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites which are in open spaces uses, potentially having adverse effects.	0	This option identifies opportunity areas within existing CPP1 strategic allocation which do not contain designated open space within these areas. Impacts are considered neutral.
3. To protect, conserve and enhance the South Downs National Park and its setting,	0	This option would rely on CPP1 CP6 which firstly directs new hotel development to central Brighton. New hotel in this location would not have any impact on the SDNP.	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites within the setting of the SDNP or	-?	This option identifies opportunity areas within existing CPP1 strategic allocations. Some of these are located within fairly close proximity to the SDNP and therefore hotel

and improve sustainable access to it		Impacts are considered neutral.		landscape sensitivities, potentially having adverse effects.		development could have adverse impacts.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-	This option would rely on CPP1 CP6 which firstly directs new hotel development to central Brighton. This includes Conservation Areas and listed buildings and new development could adversely affect heritage assets.	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites within the setting of heritage assets, potentially having adverse effects.	-/0?	Some of the strategic allocations do not contain and are not within the setting of heritage assets, and would therefore development would have a neutral effect, however some are and could have an adverse effect.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	This option would rely on CPP1 CP6 which firstly directs new hotel development to central Brighton. This area is well served by public transport, helping to reduce transport impacts.	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites that do not have good access to sustainable transport, potentially having adverse effects.	+	CPP1 Strategic allocations all generally have good access to public transport. This option may therefore help to direct new hotel development to locations where sustainable transport access is good, helping to reduce transport impacts.
6. To improve air and noise quality	+	This option would rely on CPP1 CP6 which directs new hotel development to central Brighton. This area is well served by public transport, helping to reduce likelihood of potential transport impacts, including on the AQMA.	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites that do not have good access to sustainable transport, potentially having adverse transport effects, including on air quality.	+	CPP1 Strategic allocations all generally have good access to public transport. This option may therefore help to direct new hotel development to locations where sustainable transport access is good, helping to reduce transport-related impacts.
7. To improve water quality (ecological, chemical and quantity status)	+?	This option would rely on CPP1 CP6 which directs new hotel development to central Brighton. This may result in remediation of contaminated sites, which can benefit water quality. Central	-?	This option would allocate 10 sites across the city. It is unknown where these sites would be located, and could include sites within sensitive GSPZ, potentially have adverse effects.	-?	Some of the CPP1 Strategic Allocations are located within GSPZ and therefore could potentially have adverse effects on water quality.

		Brighton is also not within a GSPZ.				
8. To reduce the risk from all sources of flooding to and from development	-?	Parts of central Brighton include areas with varying degrees of flood risk. Development can increase the risk of flooding. Avoidance of areas of GW/SW flood risk is unlikely to be a key consideration when sites come forward due to the fact that many areas of the city are at risk of flooding.	-?	Impacts the same as option 1.	-?	Impacts the same as options 1 and 2.
9. To reduce emissions of greenhouse gases that cause climate change	?	It is unknown whether hotel development within the central Brighton area would provide the opportunity to incorporate or connect to low/zero carbon energy infrastructure.	?	It is unknown whether hotel development coming forward under this option would provide the opportunity to incorporate or connect to low/zero carbon energy infrastructure.	+	Some of the strategic allocations promote delivery of low and zero carbon energy infrastructure, e.g. decentralised energy. This could include connections for new hotels and could impact positively on this objective.
10. To increase the city's resilience and ability to adapt to climate change	+	This option would rely on CPP1 CP6 which firstly directs new hotel development to central Brighton. This is likely to result in development of brownfield sites, and is unlikely to result in loss of green infrastructure or result in an increase in hard-surfacing and therefore indirectly supports climate change adaptation.	-?	This option could result in development coming forward on undeveloped/greenfield sites, or sites which contain green infrastructure, thus reducing ability to adapt to climate change.	+	The majority of the strategic allocations are brownfield sites. Hotel developments in these locations are therefore unlikely to result in loss of green infrastructure or result in an increase in hard-surfacing.
11. To improve soil quality	+?	This option would rely on CPP1 CP6 which directs new hotel development to central Brighton. This may result in remediation of contaminated sites, thus improving soil quality.	?	It is unknown whether this option would present the opportunity to improve soil quality and would depend on the site allocated.	+?	Some of the strategic allocations are known to include contaminated land. This option could therefore provide the opportunity to remediate contaminated land and improve soil quality.

13. To make the best use of land available	-	This option would rely on CPP1 CP6 which directs new hotel development to central Brighton. However, the Visitor Accommodation Study indicates that new hotel development is not coming forward. This could have adverse impacts on this objective as may not attract new hotel development to the city in order to meet visitor needs and may not make the best use of sites in the city.	-/+	It is unknown whether there are 10 sites that could be identified to meet the requirements of this option, due to competing land use needs of the city. If 10 sites are identified, this may result in lack of sites for other needs/uses and may not make the best use of sites in the city. In addition, this is based on the long term growth forecast. If this forecast is not realised, this option may result in sites not being brought forward and remaining undeveloped/vacant, which would not be a good use of land having adverse impacts.  This option includes a reference to amending a CPP2 Retaining Housing policy regarding managing short term holiday lets. This may help to manage the loss of C3 housing and ensuring a better balanced mix of uses, having positive impacts on this objective.	++	This option identifies areas of opportunity for hotel development for the low growth forecast of 5 hotels and allows the market to decide the actual site. This retains flexibility, allows other uses to come forward and should therefore help to make the best use of land available.  This option also includes a reference to amending the emerging CPP2 Retaining Housing policy regarding managing short term holiday lets. This may help to manage the loss of C3 housing to this use and ensure a better balanced mix of uses.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	This option has no impact on this objective, although it is recognised that this option misses the opportunity to address the potential losses of C3 housing to more permanent holiday lets.	+	This option includes a reference to amending a CPP2 Retaining Housing policy regarding managing short term holiday lets. This may help to manage the loss of C3 housing and should help to ensure retention of housing.	+	This option also includes a reference to amending a CPP2 Retaining Housing policy regarding managing short term holiday lets. This may help to manage the loss of C3 housing to this use and should help to ensure retention of housing.
19. To contribute	-	Although this option still enables	+?	This option would allocate 10 sites	++	This option identifies opportunity

<p>towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>		<p>hotel development to come forward, the Visitor Accommodation Study indicates that new hotel development is not coming forward due to various constraints including availability of sites. This option could therefore have adverse impacts on this objective as may result in no new hotel development coming forward, the city becoming less attractive to visitors, less able to compete with other cities, ultimately impacting on the visitor and wider economy.</p>		<p>for new hotel developments. This would help the city to attract new hotel products and new markets to the city, helping to support and increase the visitor-related economy. However, it is uncertain whether 10 sites could be found to deliver this option and is based on longer term growth forecasts. If these forecasts are not realised this may result in sites allocated remaining undeveloped and could undermine delivery of other uses which could have taken place on those sites. This option also safeguards the conference and banqueting facilities within existing hotels, which also play a significant contribution to the local economy.</p>	<p>areas for hotel development. This retains flexibility and allows the market to decide within these areas, but also signals that the city would allow new hotels in these areas and may help to bring forward applications. This option could help the city attract new hotel products and new markets, would strengthen the city's ability to compete with other cities and should significantly help to support the visitor and wider economy. This option is also based on the low growth forecast which may be a less risky forecast. This option also safeguards the conference and banqueting facilities within existing hotels, which also play a significant contribution to the local economy.</p>
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## Summary

### Option 1

- This option was found to have potential for positive impacts on the objectives for biodiversity, transport, air/noise quality, water quality, climate change adaptation, and soil quality. This option relies on CPP1 CP6 which firstly directs new hotel development to central Brighton. This helps to avoid sites with biodiversity designations, helps to deliver development in accessible locations, also supporting air quality, avoids development in sensitive GSPZs, supports redevelopment of brownfield sites supporting climate change adaptation, and may provide the opportunity to remediate contaminated land.
- This option was found to have potential for adverse impacts on the objectives for heritage, flood risk, best use of land and economic development. The central Brighton area contains numerous heritage designations, which could be impacted upon by new development. Flood risk from surface water varies across the city and redevelopment could increase hard-surfacing and flood risk. Hotel development may not come forward with this option, the visitor economy could become constrained and less able to attract new markets, and would not make the best of the city.

- This option was found to have uncertain effects for the objective for climate change mitigation as it is unknown whether hotel development within the central Brighton area would provide the opportunity to connect to low/zero carbon infrastructure.

### Option 2

- This option was found to have potential for positive impacts on the objective for housing and positive uncertain economic development. This option should help to manage the more permanent loss of C3 to short-term holiday lets. This option allocates 10 sites for hotels based on high growth forecast, which should help to bring forward new hotel development and would allow the city to attract new hotel products and markets and support the visitor economy. However there is an economic risk with this option, as could result in sites being undeveloped if the high growth forecast is not realised and some uncertainty regarding whether 10 sites could be identified.
- This option was found to have mixed impacts for making the best use of land. The positive aspects relate to the prevention of permanent loss of housing to short-term holiday lets, which helps to retain a better balanced mix of uses. The adverse effects relate to the unlikelihood that 10 sites could be identified, and that if 10 sites were identified, this may result in a lack of sites for other uses, resulting in an unbalanced mix.
- This option was found to have potential for adverse and uncertain impacts for many of the site based impacts, as the location for the sites are unknown and could result in sensitive sites being allocated or sites being located in less sustainable locations. This includes impacts on biodiversity, open space, SDNP, heritage, transport, air quality, flood risk, and climate change adaptation.
- This option was found to have uncertain impacts for reducing greenhouse gas emissions and soil quality.

### Option 3

- This option was found to have potential for significant positive impacts on the objectives for making the best use of land and economic development. This option identifies areas of opportunity for hotel development for the low growth forecast of 5 hotels and allows the market to decide on the site, which retains flexibility, allows other uses and reduces the risk of allocated sites not being developed. It should also prevent permanent loss of housing to short-term holiday lets, which helps to retain a better balanced mix of uses. Identification of areas of opportunity signals that the city would allow new hotels in these areas, could help attract new hotel products and markets, enabling the city to remain competitive and supports the visitor and wider economy. The safeguarding of conference and banqueting facilities also impacts positively for the economic development objective.
- This option was found to have potential for positive impacts on the objectives for transport, air/noise quality, climate change adaptation, reducing greenhouse gas emissions and soil quality. This option identifies areas of opportunity within existing strategic allocations. This helps to deliver development in accessible locations, also supporting air quality, supports redevelopment of brownfield sites supporting climate change adaptation, provides the opportunity for development to connect to low/zero carbon energy infrastructure and may provide the opportunity to remediate contaminated land.

- This option was also found to have potential for positive impacts on the objective for housing as should help to manage the more permanent loss of C3 to short-term holiday lets.
- This option was found to have potential for adverse impacts on the objective for biodiversity, SDNP, heritage and water quality. Some of the areas of opportunity are in close proximity to biodiversity designations, the SDNP or heritage designations and development could therefore have adverse impacts on these sensitive designations; some of the areas are located within GSPZ and could impact upon water quality.

### **Overall summary**

- Option 3 provides greater potential for positive impact. In particular this option is the most beneficial for economic development as provides certainty to hotel developers which could help to bring forward hotels, would enable the city to remain competitive, supporting the visitor and wider economy.
- This option also helps to the best use of land, through retaining flexibility and allowing the market to decide which sites to bring forward, preventing the risk of sites being undeveloped. The proposed amendment to the retaining housing policy would also be beneficial for housing as could help prevent permanent loss of C3 housing to short-term holiday lets.
- This option also provides greater certainty over the broad location of sites when compared with option 2 impacting more positively on site based objectives, however it is likely that most sites based impacts could be mitigated with all options, making this less of a consideration.



## Design & Heritage

### CPP2 Options Appraisal: DM18 Place Making (High Quality Design and Places)

#### Options Appraisal

- Option 1) No specific, criteria-based policy to assess quality of design and making places better for people in the City Plan, in particular at street level (rely on CP12 and CP13)
- Option 2) Progress Local Plan Policy QD1 and bring together guidance on place making into city-wide criteria-based policy
- Option 3) Place making issues incorporated into other policies, including those for allocated sites/development areas

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	CP13.6 requires incorporation of street trees and biodiversity wherever possible. Impacts should be positive.	?	This option may include recognition of the importance of biodiversity, e.g. street trees, in helping to form high quality places and street environment, however is fairly uncertain until the contents of the policy are known.	?	This option may include some site specific requirements relating to biodiversity but may not provide adequate guidance for the rest of the city. Impacts uncertain.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	++	CP13 seeks to deliver an improved public realm with a network of quality streets and spaces. Impacts should be significantly positive.	++	Open space and public spaces including wider public realm are an important part of creating a development that works well and looks good. This option may help to emphasise the importance of open/public space and may also help to deliver open space/public realm improvements as part of developments across the city.	?	This option may help to deliver open space/public realm improvements around certain sites but may not provide adequate guidance for the rest of the city. Impacts uncertain.
3. To protect, conserve and enhance the South Downs National Park and its setting,	+	CP12.5 requires development to have regard to impact on the purposes of the National Park, where within the setting of the National Park; and CP12.6 requires	+	This policy would be applicable to all developments within the city, which could include those within the setting of the SDNP. This option should help to deliver	?	This option would only be applicable to certain sites, some of which may be within the setting of the SDNP. This option may therefore have positive impacts on this objective, however

and improve sustainable access to it		development to protect or enhance strategic views into, out of and within the city. Impacts should be positive.		developments across the city that are well designed and look good, which should also therefore help to protect the SDNP.		would be dependent on which sites were included in the policy.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	CP12.1 requires development to raise the standard of architecture and design in the city; CP12.2 requires development to establish a strong sense of place by respecting the diverse character and urban grain of the city's identified neighbourhoods; and CP12.4 requires development to conserve or enhance the city's built and archaeological heritage and its settings. CP13.2. requires development to enhance the local distinctiveness of the city's neighbourhoods; and CP13.3. requires development to conserve or enhancing the setting of the city's built heritage. All these requirements should have a significant positive impact on this objective.	++	This option would be applicable to all developments within the city, which could include those within the setting of heritage assets SDNP. This option should help to deliver developments across the city that are well designed and look good, which should also therefore help to protect heritage assets. This option should also help to contribute towards improving the streetscape and townscape across the city, support the integration of development into the existing built environment, and help to maintain and strengthen local character.	?	This option would only be applicable to certain sites, some of which may be within the setting of heritage assets. This option may therefore have positive impacts on this objective, however would be dependent on which sites were included in the policy. This option may miss the opportunity to improve the streetscape and townscape and general character of the wider city.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	CP13 seeks to improve the accessibility of the public realm, which should have positive impacts on this objective.	0	It is considered unlikely that these issues will be addressed further. There are no impacts on this objective	0	It is considered unlikely that these issues will be addressed further. There are no impacts on this objective
16. To improve	++	CP13 seeks to improve the	++	This option should result in well-	+	This option should result in well-

health and well-being, and reduce inequalities in health		accessibility of the public realm, and seeks to encourage active and healthy lifestyles which should have positive impacts on this objective. Additionally, CP12 should support delivery of high quality, visually attractive developments and spaces, supporting mental well-being. Impacts should be significantly positive.		designed developments and places across the city. Well-designed places can contribute significantly to health, through providing a visually attractive environment, supporting mental well-being, and also through the consideration of issues such as navigation through and to a development, which can help to facilitate more active lifestyles.		designed developments and places particularly on certain sites. Although this would have the same health benefits as described under option 2, the opportunity to have these benefits across the city would be missed with this option.
17. To improve community safety, and reduce crime and fear of crime	+	CP12.9 requires development to incorporate design features which deter crime or disorder and the fear of crime and CP13.8 requires development to help create safe and inclusive public spaces. This should have a positive impact on this objective.	?	This option could include consideration of design issues which may help to improve community safety across the city, however impacts are fairly uncertain.	?	This option may include some site specific requirements which could have benefits for this objective, but would miss the opportunity to have benefits across the city. Impacts uncertain.
18. To increase equality and social inclusion	+	CP12.7 requires development to be inclusive, adaptable and accessible. CP13.8 requires development to create inclusive public spaces. This should result in positive impacts for this objective.	?	This option could include consideration of design issues which may support people with protected characteristics, e.g. by considering how to deliver developments that people can easily navigate through and around, could support older people and disabled people. However impacts are fairly uncertain.	?	This option may include some site specific requirements which could have benefits for this objective, but would miss the opportunity to have benefits across the city. Impacts uncertain.

## Summary

### Option 1 – no policy rely on CP12 and CP13

- This option should have significant positive impacts on objectives relating to open space, heritage assets/built environment and health due to existing policy requirements. This should result in quality development that creates a sense of place and respects the surrounding built environment; should result in delivery of and integration of public spaces; and should facilitate active lifestyles and deliver an attractive environment that supports mental well-being.
- This option should have positive impacts on objectives relating to biodiversity, SDNP, transport, community safety, equalities due to existing policy requirements. This should result in delivery of biodiverse features; should deliver quality development that respects the SDNP and that are safe and accessible.

### Option 2 – specific policy

- This option should have significant positive impacts on objectives relating to open space, heritage assets/built environment and health due to existing policy requirements. As with option 1, this option also has potential to result in quality development that creates a sense of place and respects the surrounding built environment; should result in delivery of and integration of public spaces; and should facilitate active lifestyles and deliver an attractive environment that supports mental well-being.
- This option should have positive impacts on objective relating to the SDNP. This option should result in high quality development which respects the setting of the SDNP.
- This option has uncertain impacts on objectives relating to biodiversity, community safety and equalities as these may be outside the scope of the policy. However any reference to the incorporation of biodiversity features and for the consideration of design which supports community safety and considers equalities issues would have benefits for these objectives across the city.

### Option 3 – incorporate into other policies, including those for sites

- This option should have positive impacts for the health objectives, as should help to deliver quality developments, particularly around certain sites, which should have benefits for promoting active lifestyles and supporting mental well-being.
- All other impacts were uncertain, mainly because this option would be unlikely to result in citywide impacts and would be limited to its potential to deliver wider sustainability improvements to around the individual sites. This option was considered to miss the opportunity to deliver wider sustainability benefits across the following objectives: biodiversity, open space, SDNP, heritage/townscape, community safety and equalities.

### Preferred Option

- Both options 1 and 2 result in similar significant positive impacts for the key objectives relating to this policy, including open space, heritage assets/townscape and health. Both options 1 and 2 also result in similar positive impacts for some other objectives including the SDNP.

- Option 1 has positive impacts across some of the environmental objectives, including biodiversity and transport, and some of the social objectives, including community safety and equalities due to existing policy requirements, whereas impacts for option 2 for these objectives are unknown, as these issues may be outside the scope of this topic area. However impacts could be positive if the policy included guidance of relevance to these objectives.
- Option 3 may miss the opportunity to have wider citywide benefits.
- Overall, options 1 and 2 have greatest potential for most positive impact.

### CPP2 Options Appraisal: DM19 Making Effective Use of Sites

#### Options:

- Option 1) No specific policy framework to ensure that new development maximises site potential and avoids the under-development of housing sites in the City Plan Part Two (rely on existing policy guidance – NPPF, NPPG and CPP1 policies or combination of other CPP2 policies)
- Option 2) Introduce into CPP2 a city-wide, criteria-based policy
- Option 3) Incorporate criteria into another CPP2 policy

#### Assumptions:

- Policy would be applicable to housing sites only
- Assume that making the most effective use of sites prevents “under-development” but should not result in “over-development”. In addition, this would be assessed through the planning application process.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	-/+?	Development of sites for housing could result in adverse impacts for biodiversity, depending on the site developed. Lack of policy framework may result in under-development on some sites and this may result in more sensitive sites being developed elsewhere instead. However, underdevelopment on a more	-/+?	As described under option 1, development of sites for housing could result in adverse impacts for biodiversity, depending on the site developed. Making the most effective use of sites could prevent the need to develop more sensitive sites, including those with greater ecological value, potentially having	-/+?	Impacts considered to be the same as option 2.

		sensitive ecological site could be of benefit on that site. Overall impacts are mixed.		positive impacts on this objective. However, maximising site use could also result in greater ecological losses on that site, having adverse impacts. Impacts are mixed.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	Lack of policy framework may result in under-development on some sites and this may result in sites of open space being at greater risk of development for housing. However, under-development on a site may result in some or greater open space provision on the site. Overall impacts are mixed.	-/+	Making the most effective use of sites could prevent the need to develop other sites for housing, e.g. open space. However, may reduce the ability to provide any on-site open space. Overall impacts are mixed.	-/+	Impacts considered to be the same as option 2.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/+?	Development of sites for housing could result in adverse landscape impacts, depending on the site developed. Lack of policy framework may result in under-development on some sites and this may result in more sensitive sites being developed elsewhere instead. However, underdevelopment on a more sensitive site in terms of landscape could be of benefit to the SDNP. Overall impacts are mixed and uncertain and will depend on the site developed.	-/+?	As described under option 1, development of sites for housing could result in adverse landscape impacts, depending on the site developed. Making the most effective use of sites could prevent the need to develop more sensitive sites, including those with greater landscape value, potentially having positive impacts on this objective. However, maximising site use could also result in greater potential for landscape impacts, having adverse impacts. Impacts are mixed and will depend on the site developed.	-/+?	Impacts considered to be the same as option 2.
4. To protect and	-/+?	Development of sites for housing	-/+?	As described under option 1,	-/+?	Impacts considered to be the same as

conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites		could result in adverse impacts on the historic built environment, depending on the site developed. Lack of policy framework may result in under-development on some sites and this may result in more sensitive sites being developed elsewhere instead. However, underdevelopment on a more sensitive site in terms of heritage could be of benefit to the historic built environment. Overall impacts are mixed and uncertain and will depend on the site developed.		development of sites for housing could result in adverse impacts on the historic built environment. Making the most effective use of sites could prevent the need to develop more sensitive sites, including those with greater heritage value, potentially having positive impacts on this objective. However, maximising site use could also result in greater potential for impacts on the adjacent historic built environment having adverse impacts. Impacts are mixed and will depend on the site developed.		option 2.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	Any housing provision could increase the amount of cars owned or journeys to and from a particular location. However, under-development could have positive impacts for this objective as may help to minimise any increase in car ownership in that location.	-	Maximising site use could result in an increase in car ownership in that location, potentially adding to local issues around congestion and parking.	-	Impacts the same as option 2.
6. To improve air and noise quality	+	Any housing provision could increase the amount of cars owned or journeys to and from a particular location and this could have air quality impacts. However, under-development could have positive impacts for this objective as may help to minimise any increase in car ownership in that location, having	-	Maximising site use could result in an increase in car ownership in that location, potentially adding to local issues around air quality.	-	Impacts the same as option 2.

		benefits for localised air quality.				
7. To improve water quality (ecological, chemical and quantity status)	-	Housing delivery will increase consumption of water. Although less water will be consumed with a smaller development due to a lower amount of inhabitants, under-development on a site may miss the opportunity to install greater water efficiency measures, e.g. which may be more viable on a larger development. Impacts are considered to be negative.	-/+?	As described under option 1, housing delivery will result in an increase in water consumption. However, maximising the amount of development delivered on a site could mean that certain water efficient technologies are more viable, having benefits for reducing water consumption although this is fairly uncertain.	-/+?	Impacts the same as option 2.
8. To reduce the risk from all sources of flooding to and from development	-/+	Housing delivery will result in an increase in the urbanised environment, and this can cause an increase in flood risk, particularly from surface water. Under-development of a site could result in less of a site being developed for housing which could have positive impacts for this objective. Overall impacts are mixed and will depend on the nature of the site.	-	As described under option 1, housing could increase flood risk through an increase in urbanisation. Maximising site potential may increase this risk of flooding further.	-	Impacts the same as option 2.
9. To reduce emissions of greenhouse gases that cause climate change	-	Housing delivery will increase consumption of energy. Although less energy will be consumed with a smaller development due to a lower amount of inhabitants, under-development on a site may miss the opportunity to install greater energy efficiency measures, e.g. which may be more viable on a larger development. Impacts are	-/+?	As described under option 1, housing delivery will result in an increase in energy consumption. However, maximising the amount of development delivered on a site could mean that certain energy saving technologies are more viable, having benefits for reducing energy consumption although this is fairly uncertain.	-/+?	Impacts the same as option 2.



		considered to be negative.				
10. To increase the city's resilience and ability to adapt to climate change	-/+?	Delivery of housing can increase flood risk due to an increase in the urbanisation nature of the environment, as described under objective 8. However, under-development of a site may help to retain greater areas which can provide a natural function, and may reduce the amount of massing which can otherwise contribute to the urban heat island effect. Overall impacts are mixed.	-	Maximising site use may result in a greater amount of the site being urbanised, therefore increasing flood risk. In addition, increased massing may occur if a site is maximised, and this can contribute towards the urban heat island effect.	-	Impacts the same as option 2.
11. To improve soil quality	+	Housing delivery could result in remediation of contaminated land, regardless of whether the sites capacity is under-developed or maximised.	+	Impacts the same as option 1.	+	See option 1.
12. To minimise and sustainably manage waste	-	Housing delivery will result in an increase in waste regardless of whether the sites capacity is under developed or maximised.	-	See option 1.	-	See option 1.
13. To make the best use of land available	-	This option would not make the best use of land available and may lead to increased pressure on more sensitive sites.	++	This option should result in site capacity being maximised and therefore should help to make the best use of the land available having significant positive impacts.	++	Impacts the same as option 2.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	This option would result in the delivery of housing, however the risk of underdevelopment of sites may mean that provision is not maximised.	++	This option should result in site capacity being maximised and a greater amount of housing being delivered than option 1, having significant positive effects.	++	Impacts the same as option 2.

15. To improve the range, quality and accessibility of services and facilities.	0	Delivery of housing can increase pressure on existing services, such as healthcare and education. If sites are underdeveloped, then this may mean there is less pressure on existing facilities. However, development can also contribute towards improving services to ensure that future needs can be met, based on the assumption that all development would contribute towards infrastructure required in order to make development acceptable. Overall impacts likely to be neutral.	0	This option could result in an increase in pressure on existing services and facilities, however should also result in contributions towards or improvements to infrastructure in order to make development acceptable. Overall impacts also considered to be neutral based on the assumption that all development will have to contribute towards infrastructure regardless of the quantity of housing is delivered.		Impacts the same as option 2.
16. To improve health and well-being, and reduce inequalities in health	+	Housing will be delivered with this option, which is one of the wider determinants of health. Under-development on a site is unlikely to result in any health impacts and could be beneficial on neighbouring residential amenity.	-/+	Although a greater amount of housing will be delivered with this option which contributes to the wider determinants of health, increased amounts of development on a site could have greater potential for adverse amenity impacts on neighbouring residents. Overall impacts are considered to be mixed.	-/+	Impacts the same as option 2.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local needs	+	Housing will be delivered with this option, having positive impacts for this objective due to the links between housebuilding and economic growth. However, site capacity may not be maximised therefore impacts not considered to be significant.	++	House building is intrinsically linked to economic growth. This option should result in site capacity being maximised and a greater amount of housing being delivered, having greater potential for significant positive impact.	++	Impacts the same as option 2.

## Summary

### Option 1 – no policy

- There are 5 objectives where this option had the potential for positive impacts: air quality, soil quality, housing, health and economic development. Although this option will potentially result in under-development, delivery of housing will still come forward with this option, having benefits for the social determinants of health, housing and economic development. Under-development could have benefits for air quality, and any amount of development could potential remediate contaminated land. None of the impacts were considered to be significant.
- There are 7 objectives where this option had the potential for mixed positive and adverse impacts: biodiversity, open space, SDNP, historic built environment, transport, flood risk and climate change adaptation. Underdevelopment on some sites may increase pressure to develop more sensitive sites elsewhere, including those of sensitive ecological, heritage or landscape value, or sites of open space, however could have on-site benefits and would depend on the sensitivity of the site itself. Under-development may help to minimise transport impacts around the site, although could still have some transport impacts. Housing provision may result in increased urbanisation which can contribute to increased flood risk, however underdevelopment may limit this and provide opportunities for on-site mitigation, as well as reduced massing, helping to minimise the urban heat island effect.
- There are 4 objectives where this option had the potential for adverse impacts: water quality, energy consumption, waste and making the best use of land. Development will still come forward with this option resulting in an increase in water and energy consumption and waste generation. Smaller developments may mean that opportunities to install greater water and energy efficiency technologies are missed. This option may result in underdevelopment which will not make the best use of land available in the city.
- There was 1 objective where the impacts were considered to be neutral: services and facilities. Any amount of housing delivery can increase pressure on existing services, however it is assumed that contributions towards infrastructure would be secured to make development acceptable, therefore having neutral impacts overall.

### Option 2 – criteria-based stand-alone policy

- There are 3 objectives where this option had the potential for significant positive impacts: making the best use of land, housing and economic development. This option should maximise site potential, delivering the maximum amount of housing and helping to make the best use of each site. Higher amounts of housing delivery have benefits for economic growth which is intrinsically linked to house-building. These positive impacts are more significant than option 1.
- There is 1 objective where this option had a positive impact: soil quality. As with option 1, any amount of development has the potential to remediate contaminated land.
- There are 7 objectives where this option had the potential for mixed positive and negative impacts: biodiversity, open space, SDNP, historic built environment, water quality, energy consumption and health. Maximising site capacity could reduce the pressure to build on more sensitive sites, including those of ecological, landscape or heritage value, as well as open spaces, however may have greater ecological, landscape and heritage impacts on or around the actual sites themselves, depending on the sensitivity of the site. Development will result in consumption of water and energy, however greater

amounts of development may increase the opportunity to install water and energy efficient technologies, e.g. through viability. Greater amounts of development will have more beneficial health outcomes in terms of provision of housing, however may increase the risk of adverse health and amenity impacts on adjacent residents.

- There are 5 objectives where this option had potential for adverse impacts: transport, air quality, flood risk, climate change adaptation and waste. Maximising site capacity could result in an increased amount of car ownership/transport movements around the site, also having air quality impacts. Maximising site capacity may result in an increase in the urbanised environment as well as increased massing, which may lead to increased flood risk and potentially adding to the urban heat island effect. Any increase in development will generate waste.
- As with option 1, this option had neutral impacts on 1 objective: services and facilities. Any amount of housing delivery can increase pressure on existing services, however it is assumed that contributions towards infrastructure would be secured to make development acceptable, therefore having neutral impacts overall.

### **Option 3 – criteria contained with other CPP2 policy**

- Impacts considered to be the same as option 2.

### **Preferred option**

- There are benefits and disadvantages to all options. The majority of the environmental objectives are at risk of adverse impacts with all options, with there being no clear preferred option in terms of these objectives. Less development on some sites could result in greater risk of adverse impacts on more sensitive sites, yet conversely more development on some sites could result in greater risk of adverse impact on the site itself. These types of impact would be dependent on the sensitivity and location of the site developed. Less development on some sites may also provide greater opportunities for certain types of mitigation, e.g. flood risk, however more development on some sites may provide greater opportunities to install new technologies e.g. to improve water and energy efficiency due to viability.
- Options 2 and 3 were found to have greater potential for more significant positive impact on the key objective to this topic area: making the best use of land available and housing. These are critical issues for the city due to the constrained nature of the city and the high need for housing. It is assumed that these options would not result in over-development and that impacts therefore on other planning considerations e.g. biodiversity, heritage, landscape, air quality, transport, flood risk, climate change would therefore be acceptable, reducing the risk of some of the adverse impacts discussed above, however this could be specifically referred to in the policy.
- Although the impacts for options 2 and 3 are broadly the same, in practice option 2 is likely to have greater potential for positive impacts where positive impact is predicted, as would potentially guidance provided in a stand-alone policy would be clearer. Option 2 is considered to be the preferred approach.

**CPP2 Options Appraisal: DM20 Protection of Amenity**

**Options:**

1. No specific policy framework to manage the protection of amenity in the City Plan Part Two (rely on existing policy guidance – NPPF, NPPG and CPP1 policies CP12, CP13 or combination of other CPP2 policies)
2. Progress Local Plan Policy QD27 into city-wide criteria-based policy
3. Amenity issues incorporated into other policies, including those for allocated sites/development areas

**Assumptions**

- Amenity deals with potential impacts from development on people. Impacts from development on other issues, e.g. biodiversity, open space, SDNP, heritage etc are dealt with through other policies.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	Although reducing the need to travel is not directly linked to amenity, there could be amenity issues arising from any changes in traffic associated with a new development. This could include noise and pollution as well as the impact of transport movements. NPPF para. 17 does require a good standard of amenity to be sought, however does not provide any further details on this. CPP1 CP9 Sustainable Transport sets the overarching strategy in terms of travel and movement, however this policy does not include consideration of amenity impacts. It is therefore considered that not	+?	An amenity policy could have positive impacts on this objective as it could include criteria that requires greater consideration of transport-related impacts. This may result in the encouragement of travel by sustainable forms of transport.	+?	This option could have positive impacts on this objective as it could include criteria to address transport based amenity issues on a site by site basis. However this would require individual assessments of sites to enable site specific issues to be identified and could also go out of date fairly quickly as circumstances change.

		having an amenity policy could potentially have an adverse impact on this objective.				
6. To improve air and noise quality	-	Noise and air pollution can arise from various sources including transport, commercial and industrial processes as well as noise nuisance generated by people using a development, e.g. for recreation. NPPF para. 17 does require a good standard of amenity to be sought, however does not provide any further details on this. CPP1 policies do not provide any further details on protection of amenity from air and noise issues. It is therefore considered that not having an amenity policy could have an adverse impact on this objective as opportunities to protect or improve air and noise quality could be over-looked.	+?	An amenity policy could have positive impacts on this objective as it could include criteria that requires greater consideration of air and noise quality issues.	+?	This option could have positive impacts on this objective as it could include criteria to address air and noise issues on a site by site basis. However this would require individual assessments of sites to enable site specific issues to be identified and could also go out of date fairly quickly as circumstances change.
8. To reduce the risk from all sources of flooding to and from development	+	Flooding can have a significant impact on amenity and the risk of flooding can change as a result of development. CPP1 CP11 Managing Flood Risk requires development to manage and reduce flood risk and any adverse effects on people or property. This high level requirement should provide a certain level of protection of amenity from this issue.	+	Impacts considered to be the same as option 1. Amenity policy could require the consideration of the impacts of flood risk on amenity, however this is considered to be addressed by CPP1 CP11 at a higher level.	+	Impacts considered to be the same as option 1. Site specific policies could require the consideration of the impacts of flood risk on amenity, however this is considered to be addressed by CPP1 CP11.

9. To reduce emissions of greenhouse gases that cause climate change	+	Not having a policy on amenity is considered to have a positive impact on reducing the emissions of greenhouse gases as it may enable certain types of development to come forward more easily, e.g. wind turbines that could otherwise be considered to have an amenity impact.	-	Protection of amenity could prevent or restrict certain types of development from coming forward, including development which helps to mitigate climate change, e.g. wind turbines or other low/zero carbon development. This option could therefore have an adverse effect on this objective.	?	A site specific policy may help to identify sites where this type of development would be acceptable on grounds of amenity, however this would rely on individual site assessments taking place and is therefore uncertain. In addition, site assessments may become out of date over time.
10. To increase the city's resilience and ability to adapt to climate change	+	Flooding can have a significant impact on amenity and the risk of flooding can change as a result of development. CPP1 CP11 Managing Flood Risk requires development to manage and reduce flood risk and any adverse effects on people or property. This high level requirement should provide a certain level of protection of amenity from this issue.	+	Impacts considered to be the same as option 1. Amenity policy could require the consideration of the impacts of flood risk on amenity, however as this is already addressed by CPP1 CP11 this may just repeat existing policy.	+	Impacts considered to be the same as option 1. Site specific policies could require the consideration of the impacts of flood risk on amenity, however as this is already addressed by CPP1 CP11 this may just repeat existing policy.
12. To minimise and sustainably manage waste	+	Not having a policy on amenity is considered to have a positive impact on minimising waste as it may enable certain types of development to come forward more easily, e.g. waste-related development, that could otherwise be considered to have an amenity impact.	-	Protection of amenity could prevent or restrict certain types of development from coming forward, including waste-related development that could otherwise be considered to have an amenity impact. This option could therefore have an adverse effect on this objective.	?	A site specific policy may help to identify sites where this type of development would be acceptable on grounds of amenity, however this would rely on individual site assessments taking place and is therefore uncertain. In addition, site assessments may become out of date over time.
13. To make the	+	Not having a policy on amenity is	-	Protection of amenity could	?	A site specific policy may help to

best use of land available		considered to have a positive impact on making the best use of land available, as it may enable certain types of development to come forward more easily, e.g. taller buildings and higher density development, that could otherwise be considered to have an amenity impact.		prevent high density development from coming forward. This option could therefore have an adverse effect on this objective.		identify sites where higher density development would be acceptable on grounds of amenity, however this would rely on individual site assessments taking place and is therefore uncertain. In addition, site assessments may become out of date over time.
16. To improve health and well-being, and reduce inequalities in health	+	CPP1 CP18 Healthy City sets the high level policy requiring the health impacts of certain strategic and larger developments to be addressed and this will have a positive impact on health and amenity. However this policy would not provide adequate protection of amenity from smaller developments, including householder developments, and would leave a policy gap that is not adequately filled by the NPPF para 17.	++	This option should have significant positive impacts on this objective as protection of amenity and therefore the health and well-being of residents/users is the key aim of this policy. It is assumed that the policy would include criteria to make sure all aspects of health & wellbeing are addressed, including for example, light, noise, privacy and safety, as well as various forms of pollution.	+	This option should have positive impacts on this objective. Site specific policies could also include more detailed consideration of site-based health concerns, having potential for positive impact, however there is a risk that these may change over time resulting in the policy becoming out of date. In addition, there is the risk that amenity impacts of developments that are not covered by site based policies are not adequately covered with this option.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	Not having a policy on amenity is considered to have a positive impact on economic development as it may enable certain types of development to come forward more easily, e.g. employment uses that may otherwise be considered to have an amenity impact.	-	Protection of amenity could prevent certain employment-based development from coming forward on amenity grounds. This option could therefore have an adverse effect on this objective.	?	A site specific policy may help to identify sites where employment based development would be acceptable on amenity grounds, however this would rely on individual site assessments taking place and is therefore uncertain. In addition, site assessments may become out of date over time.

**Summary**



### Option 1

- There are 4 objectives where this option performed better than both the other options (climate change mitigation, waste minimisation, making the best use of land and economic development). A lack of amenity policy may be less restrictive for certain types of development which could have significant amenity impacts, e.g. energy infrastructure, waste development, high density development and employment based development and may enable them to come forward more easily.
- Although this option had a positive impact on health, this option did not perform as well as option 2 on this objective. Not having an amenity policy would mean relying on CPP1 CP18 for health based impacts and this would leave a policy gap for developments that fall outside the remit of this high level policy.
- As with options 2 and 3, this option was found to have positive impacts on flood risk and climate change adaptation, as CPP1 CP11 is considered to provide high level protection of potential amenity impacts arising from flood risk.
- There are two objectives where this option performed worse than both other options and could result in adverse impacts (transport and air/noise pollution). A lack of policy may result in transport based amenity impacts not being fully considered or addressed.

### Option 2

- This option performed better than both the other options on the key objective of health, with impacts on health likely to be significant due to the protection of health and well-being that an amenity policy would bring.
- This option performed better than option 1, and the same as option 3, for objectives on transport and air/noise pollution. An amenity policy would allow greater consideration of transport, air and noise issues.
- As with options 2 and 3, this option was found to have positive impacts on flood risk and climate change adaptation, as CPP1 CP11 is considered to provide high level protection of potential amenity impacts arising from flood risk.
- There are four objectives where this option performed worse than option 1 and where the results could be adverse (climate change mitigation, waste minimisation, making the best use of land, and economic development). A policy on amenity may prevent or restrict certain types of development from coming forward on amenity grounds, e.g. energy infrastructure, waste development, high density development, certain employment uses.

### Option 3

- This option did not perform better overall than any of the other options and resulted in more uncertainty.
- As with options 2 and 3, this option was found to have positive impacts on flood risk and climate change adaptation, as CPP1 CP11 is considered to provide high level protection of potential amenity impacts arising from flood risk.
- Although this option had a positive impact on health, this option did not perform as well as option 2 on this objective. Having a site based amenity policy would mean that site specific health and amenity impacts would be addressed, but this would leave CPP1 CP18 to be applicable outside these areas, potentially leaving a policy gap.

- As with option 2, this option performed better than option 1 and the same as option 2 for objectives on transport and air/noise pollution. A site based amenity policy would allow greater consideration of transport, air and noise issues.
- There were four objectives where the impacts were considered to be uncertain (climate change mitigation, waste minimisation, making the best use of land, and economic development). A site specific policy may help to identify sites where various types of development would be acceptable on amenity grounds e.g. energy infrastructure, waste development, high density development, and certain employment based development. However this would rely on individual site assessments taking place, and is therefore considered to be uncertain. In addition, a site based policy may become out of date over time.

### **Preferred Option**

- There is more uncertainty with option 3 than the other options. This option is likely to rely on site assessments to inform a policy approach and may become out of date more quickly than a more generic policy approach.
- Both options 1 and 2 had different merits. Option 1 could be seen as less restrictive, and this may help bring certain types of development come forward more easily having wider sustainability benefits. However, this approach may result in amenity and health impacts not being fully addressed.
- Option 2 had greater potential for more significant positive impact on the health objective than both other options, which is the key objective applicable to this topic area.
- Option 2 is likely to be the preferred approach. It should ensure it is not unduly restrictive that it would prevent certain types of development from coming forward that could have wider sustainability benefits.

### **CPP2 Options Appraisal: DM21 Extensions and alterations**

#### **Options:**

- 1) No policy framework in CPP2 to manage the extensions and alterations policy in the City Plan (rely on general design policies in CPP1 (CP12, CP13), PD rights and building regs.
- 2) Progress Local Plan Policy QD14 and SPD 12 Design Guide for Extensions and Alterations into a single, city-wide policy in the City Plan (additional restrictions for Conservation Areas to be outlined via Heritage policies) (e.g. no SPD)
- 3) Progress Local Plan Policy QD14 and elements of SPD 12 Design Guide for Extensions and Alterations into City Plan city-wide policy and review SPD12 to make it more flexible (additional restrictions for Conservation Areas to be outlined via Heritage policies)

#### **Assumptions**

- Assume that options 2 and 3 will not repeat any policy of a strategic nature that is included in CPP1.

## Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	Extensions and alterations could have adverse impacts on biodiversity depending on their scale and location, however also present an opportunity for net gains. CPP1 policies CP8 & CP10 in particular should ensure a positive impact for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to biodiversity as this is already provided at a strategic level by CPP1. No impacts anticipated	0	It is considered unlikely that this option will provide any further detail with regards to biodiversity as this is already provided at a strategic level by CPP1. No impacts anticipated
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	Extensions and alterations could have adverse impacts on the SDNP or its setting depending on their scale and location. CPP1 policy SA5 sets the strategic approach to protecting the setting of the SDNP. In addition CP12 requires consideration of impacts on the SDNP setting. This should ensure impacts of extensions are positive for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to protecting the SDNP as this is already provided at a strategic level by CPP1. No impacts anticipated	0	It is considered unlikely that this option will provide any further detail with regards to protecting the SDNP as this is already provided at a strategic level by CPP1. No impacts anticipated
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	Any new development could have impacts on heritage assets depending on its location. CPP1 policy CP15 sets the strategic approach to protecting and enhancing heritage assets. CPP1 CP12 Urban Design requires all development to conserve or enhance the city's built heritage. This should ensure impacts of	++/?	This option could have significant positive impacts for this objective as should help to promote high quality design. Including guidance that was within an SPD into policy is considered to result in a stronger position. However, the option states that additional restrictions	+/?	This option could have positive impacts for this objective as should help to promote high quality design. Positive impacts may be less strong than option 2 as guidance that remains within an SPD and not CPP2 policy will carry less weight. However, this option also states that additional restrictions within Conservation Areas will be dealt

		extensions are positive for this objective and that adverse impacts are avoided.		within Conservation Areas will be dealt with through CPP2 Heritage policies. SPD12 currently contains specific considerations relevant to applications within Conservation Areas and it is unknown whether the emerging policy in CPP2 will cover these issues as fully. Impacts on this objective are therefore also uncertain.		with through CPP2 Heritage policies. SPD12 currently contains specific considerations relevant to applications within Conservation Areas and it is unknown whether the emerging policy in CPP2 will cover these issues as fully. Impacts on this objective also uncertain.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective	0	There are no direct impacts on this objective
9. To reduce emissions of greenhouse gases that cause climate change	+	Extensions and alterations could increase greenhouse gas emissions however also present an opportunity to improve energy efficiency. CPP1 policies CP8 and CP12 point 3 should ensure a positive impact on this objective.	0	It is considered unlikely that this option will provide any further detail with regards to energy efficiency as this is already provided at a strategic level by CPP1. No impacts anticipated	0	It is considered unlikely that this option will provide any further detail with regards to energy efficiency as this is already provided at a strategic level by CPP1. No impacts anticipated
10. To increase the city's resilience and ability to adapt to climate change	+	Extensions and alterations may present an opportunity to improve adaptability and resilience to climate change. CPP1 policies CP8 should ensure a positive impact on this objective.	0	It is considered unlikely that this option will provide any further detail with regards to climate change adaptation as this is already provided at a strategic level by CPP1. No impacts anticipated	0	It is considered unlikely that this option will provide any further detail with regards to climate change adaptation as this is already provided at a strategic level by CPP1. No impacts anticipated

12. To minimise and sustainably manage waste	+	Extensions and alterations may produce/increase waste generation. CPP1 policies CP8 should ensure a positive impact on this objective.	0	It is considered unlikely that this option will provide any further detail with regards to waste as this is already provided at a strategic level by CPP1. No impacts anticipated	0	It is considered unlikely that this option will provide any further detail with regards to waste as this is already provided at a strategic level by CPP1. No impacts anticipated
16. To improve health and well-being, and reduce inequalities in health	-/+	Poorly designed extensions and alterations can have ongoing adverse impacts on amenity and therefore health of neighbours. CPP1 policy CP12 Urban Design sets the strategic policy requirements relating to design, and CP18 Healthy City sets the requirements relating to health for strategic and larger developers, however impacts on neighbours or amenity is not a consideration and may be overlooked with this option. Impacts considered to be mixed.	++	Where poorly designed, extensions can have adverse effects on inhabitants of neighbouring properties, including impacts on health. This option should result in significant positive impacts for this objective as will provide policy on design of extensions and alterations, and although this won't improve health as such, it will help to avoid and minimise potential health impacts.	+	As with option 2, this option should result in positive effects for this objective. Impacts are not as significantly positive as option 2, as any detail that is included within an SPD and not within the policy will not carry as much weight.
17. To improve community safety, and reduce crime and fear of crime	+	Although not a direct link, CPP1 policy CP12 point 9 requires all development to incorporate features which design out or deter crime. This may result in positive effects for this objective.	0	It is considered unlikely that this option will provide any further detail with regards to crime reduction as this is already provided at a strategic level by CPP1. No impacts anticipated	0	It is considered unlikely that this option will provide any further detail with regards to crime reduction as this is already provided at a strategic level by CPP1. No impacts anticipated

## Summary

### Option 1 – no policy in CPP2

- This option was found to have positive impacts for a number of objectives as CPP1 sets the strategic approach to addressing various issues that could be associated with extensions including: biodiversity; SDNP; historic built environment; greenhouse gas emissions; climate change adaptation; waste and crime prevention.
- This option was found to have potential for mixed (-/+ ) impacts for the objectives for health objective as although CPP1 sets the strategy to help improve health, it does not address details such as amenity/health impacts on neighbours from small-scale development.

### **Option 2 - detailed DM policy (no SPD)**

- Unlike option 1, where impacts were mixed, this option was found to have potential for significant positive impacts for health as this option should reduce the risk of poorly designed extensions which could have adverse health impacts on neighbours. Impacts were significant as all guidance would be contained within policy.
- This option was found to have mixed, significantly positive/uncertain impacts on the heritage/townscape objective. This option should help to promote high quality design, having significantly positive impacts for townscape, however is uncertain as this option relies on issues relating to extensions within Conservation Areas being addressed in a separate CPP2 Conservation Area policy, for which the contents are currently unknown.
- Unlike option 1, where impacts were positive, this option was found to have no impacts on objectives for the biodiversity, SDNP, reducing greenhouse gas emissions, climate change adaptation, waste and crime. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that option 2 would provide any further details or requirements on the issues for extensions.

### **Option 3 – brief DM policy (with new SPD)**

- Unlike option 1, where impacts were mixed, this option was found to have potential for positive impacts for health as this option should reduce the risk of poorly designed extensions which could have adverse health impacts on neighbours. Impacts were not significant as option 2 as requirements would be contained within policy and an SPD, which carries less weight than policy.
- This option was found to have mixed, positive/uncertain impacts on the heritage/townscape objective. This option should help to promote high quality design, having positive impacts for townscape, however is uncertain as this option relies on issues relating to extensions within Conservation Areas being addressed in a separate CPP2 Conservation Area policy, for which the contents are currently unknown. Impacts were not significant as option 2 as requirements would be contained within policy and an SPD, which carries less weight than policy.
- Unlike option 1, where impacts were positive, this option was found to have no impacts on objectives for the biodiversity, SDNP, reducing greenhouse gas emissions, climate change adaptation, waste and crime. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that option 2 would provide any further details or requirements on the issues for extensions.

### **Overall summary / preferred option**

- Option 1 has potential for positive impacts across a wider range of objectives than options 2 and 3, however this is because option 1 sets the strategy and covers a range of issues which are unlikely to be addressed further or repeated.
- Option 1 has potential for mixed impacts for health as potential issues are not considered to be addressed in detail in CPP1.
- Options 2 and 3 have potential for greater positive impact than option 1 for some of more critical objectives for this topic area, including heritage/townscape and health, as these options should provide clarity on design which can have positive effects for both townscape and health. Option 2 has potential for greater positive effect on these objectives, as all requirements would be within policy and not an SPD. However both options 2 and 3 have potential for uncertain impacts for heritage as will rely on the CPP2 Conservation Area policy to address issues relating to extensions in these areas and the content of this emerging policy is currently unknown.
- Options 2 or 3 are likely to be the preferred approach for this topic.

## CPP2 Options Appraisal: DM22 Landscape Design & Trees

### Options Appraisal

- Option 1) No policy framework in CPP2 to address and protect landscape design and trees but rely on NPPF and high level policy CP10 Biodiversity, CP12 Urban Design, CP13 Public Streets and Spaces, CP16 Open Space.
- Option 2) One criteria based policy addressing landscape design and trees
- Option 3) Two policies in CPP2 : one for landscape design and one for trees and hedgerows similar to the Local Plan

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	CPP1 should result in positive impacts for biodiversity due to various strategic policy requirements, however may not adequately address landscape design issues, nor provide adequate guidance in relation to special trees, e.g. those subject to TPOs.	++	This option has potential to have significant positive impacts on this objective as should provide clear policy requirements in relation to landscape design and trees and therefore should help to improve and increase biodiversity, particularly trees.	++	Options considered to be similar to option 2.
2. To protect and improve open space and green infrastructure and	+	CPP1 should result in positive impacts for this objective due to various strategic requirements relating to protection and	++	This option has potential to have significant positive impacts on this objective as should provide clear policy requirements in relation to	++	Options considered to be similar to option 2.

improve sustainable access to it		improvement of open space, however may not provide adequate guidance in relation to landscape design and trees, which would form an important part of the green infrastructure network.		landscape design and trees, which will help to increase provision of green infrastructure and may help to improve open spaces.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	CP12.5 requires development to have regard to the purposes of the SDNP which should have positive impacts for this objective.	+?	This option could have positive impacts on this objective as good quality landscaping and trees could be used to prevent adverse landscape impacts on the SDNP, where development is located within the setting.	+?	Impacts the same as option 2.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	This option should have positive impacts on this objective due to the various strategic policy requirements relating to conservation of the city's heritage assets, however may not provide adequate guidance in relation to landscape design and trees and how they can contribute to conserving the historic built environment.	+	Good quality landscaping and trees can both help to improve or maintain the streetscene and townscape which may be particularly important within heritage settings. This option should therefore have positive impacts on this objective as could help to protect and conserve heritage assets and help to create local distinctiveness. This impact could be more significant if the policy referenced how landscape design and trees could contribute towards conserving the historic built environment.	+	Impacts the same as option 2.
7. To improve water quality (ecological, chemical and	+	CP10 2d requires development to contribute positively to ecosystem services, and this could include e.g.	+	This option should result in clear guidance on hard and soft landscaping to be delivered as	+	Impacts considered to be the same as option 2.



quantity status)		biodiverse features which provide SUDS.		part of a development, as well as protection and planting of trees. Certain types of green infrastructure can help to reduce surface water run-off and protect water quality, acting as SUDS. Impacts therefore considered to be positive and could become significantly positive if this option/policy were to require integration of SUDS as part of landscaping.		
8. To reduce the risk from all sources of flooding to and from development	+	As described under objective 7, this option will result in delivery of biodiversity features which can help to reduce flood risk in certain locations. Impacts positive.	+	As described under objective 7, this option will result in delivery of landscape features which can help to reduce flood risk in certain locations. Impacts therefore considered to be positive and could become significantly positive if this option/policy were to require integration of SUDS as part of landscaping.	+	Impacts considered to be the same as option 2.
10. To increase the city's resilience and ability to adapt to climate change	+	See objectives 7 and 8.	+	See objectives 7 and 8. In addition, this option could have more significantly positive impacts if this option/policy were to require integration of SUDS as part of landscaping and to require drought resistant planting.	+	See objectives 7 & 8.
16. To improve health and well-being, and reduce inequalities in	++	This option should result in significant positive impacts for this objective, as will result in biodiversity, open spaces, and high	++	This option should result in significant positive impacts for this objective, as will result in attractive environments with	++	Impacts considered to be the same as option 2.

health		quality streets and places, all of which will contribute towards good health.		opportunities for activity, both of which will contribute towards good health.		
Summary	All options should result in significant positive impacts for health, as should help to result in attractive environments, with opportunities for activity, both supporting good health and well-being.					

**Summary**

**Option 1**

- This option has the potential for positive impacts on objectives for biodiversity, open space, SDNP, heritage/built environment, water quality, flood risk, climate change adaptation and health. This option should result in delivery of biodiversity features which can have benefits for helping to reduce surface water run-off and flood risk and help with climate change adaptation; should result in open and public spaces, and should ensure that development helps to conserve special landscapes including the SDNP and heritage assets. Biodiversity, open spaces, and high quality streets and places will all contribute towards good health.

**Options 2 and 3**

- These options were considered to result in similar impacts.
- Both options have potential for significant positive impacts for biodiversity, open space and health. These options should result in landscaping and trees therefore increasing biodiversity; should help to improve open and public spaces, and help to deliver high quality environments, all of which will contribute positively towards good health.
- Both options have potential for positive impacts for the SDNP, heritage/built environment, water quality, flood risk and climate change adaptation. Both options should help contribute towards delivery of well-designed schemes that consider the surrounding environment, including heritage assets and the SDNP, and should also result in soft landscaping features which can contribute towards reducing surface water run-off, reducing flood risk and therefore adapting to climate change.

**Preferred Option**

- Either options 2 or 3 are the preferred approach.
- Both are likely to result in largely positive impacts, in particular for landscaping to deliver opportunities to improve biodiversity and open spaces in and around developments, and also through opportunities to contribute towards an improved built environment and streetscene.
- Both could increase the likelihood of significant positive impact on objectives relating to water quality, flood risk and climate change adaptation if the policy included a reference to incorporating SUDS and climate resilient planting within landscaping schemes.

- In addition, both could increase the likelihood of significant positive impact if the policy referenced how landscape design and trees could contribute towards conserving the historic built environment.

### CPP2 Options Appraisal: DM23 and DM24 Shop Fronts and Advertisements

Options:

- Option 1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1
- Option 2) No specific policy but rely on the NPPF, high level policy CP12 in CPP1 and retain existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)
- Option 3) Include policy wording on shop fronts and advertisements in the Place Making policy.
- Option 4) Have a specific policy in CPP2 on Shop Fronts and Advertisements supported by retained existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)

Assumptions:

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects	4	Summary of Effects
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+?	CPP1 CP12 sets the strategic policy in relation to design, which would be applicable to all developments, and requires the city's built heritage to be conserved or enhanced, however does not have any specific reference to shop fronts or advertisements. NPPF para 67 and 68 provides some policy on	+	SPD02 provides guidance on Shop Front Design. SPD07 provides guidance on Advertisements both of which should result in a visually attractive built environment. Both include guidance on developments within listed buildings or Conservation Areas. Impacts considered to be the same as option 1 for this objective as although an SPD can provide	+?	This option would result in a generic Place-making policy that would be applicable to all forms of development including shop fronts and advertisements. This may not adequately cover the special features of shop front design, nor consider advertisements in relation to this objective, e.g. in a way that helps to create distinctive streetscapes or protect the	++	This option would result in a policy that contains specific criteria and considerations that are applicable to shop fronts and advertisements, and should ensure specific issues are addressed. This option should result in a more significant positive impact on this key objective as should help to ensure quality

		advertisements, but does not refer to shop fronts. Although impacts should be largely positive, due to the strategic nature of these policies, this option may not be sufficient for this type of development.		additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 for this objective.		historic built environment. Although impacts are considered to be positive, there is some uncertainty with this option.		designed development is delivered which contributes towards streetscapes and built heritage.  A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.
16. To improve health and well-being, and reduce inequalities in health	+	Illuminated advertisements can result in light pollution and harm visual amenity having impacts on health. NPPF para 67 refers to the control of advertisements on amenity grounds, although provides no further policy on this. However, impacts should be positive.	+	SPD02 should result in visually attractive shop fronts, contributing to a visually attractive built environment, which can help support good well-being. SPD07 should ensure that any light pollution is minimised, reducing the potential of light amenity impacts. Overall impacts should be positive and similar to option 1, as although the SPDs provide additional guidance, they do not set policy.	+?	This option would result in a generic Place-making policy that would be applicable to all forms of development including shop fronts and advertisements. This should have positive effects on this objective, as should ensure that good design in general is delivered, however may miss some of the specific considerations in relation to amenity impacts, e.g. from lighting, and is therefore also considered to be uncertain.	+	This option should result in well-designed shopfronts, which contribute towards creating a visually attractive environment, and this can have positive impacts on mental well-being. In addition, this option would provide the opportunity to have a specific requirement relating to the consideration of amenity impacts, particularly from lighting. Overall, impacts should be positive, but are not considered to be

								significantly positive.
17. To improve community safety, and reduce crime and fear of crime	+	Larger or badly placed advertisements could be a distraction which could affect road safety. NPPF para 67 refers to the control of advertisements on safety grounds although provides no further policy on this. CP12.9 requires development to deter crime. Overall, impacts should be positive, however the requirements are very strategic in nature.	+	SPD02 provides guidance on measure which could help deter crime. In addition, SPD07 provides guidance which should ensure road/pedestrian safety is not compromised. Overall impacts should be positive and similar to option 1, as although the SPDs provide additional guidance, they do not set policy.	?	This option would result in a generic Place-making policy that would be applicable to all forms of development including shop fronts and advertisements. It is unknown whether a Place-making policy would incorporate requirements relating to community safety, as this maybe outside the scope of the policy. Impacts are therefore uncertain.	+?	This option should include policy requirements relating to the consideration of issues, as this is one of the planning considerations set out in the NPPF. This option would also provide the opportunity to provide further requirements to ensure that shop front design consider features which design out crime, however this may be outside the scope of a policy and is therefore uncertain until the contents of the policy are known.
18. To increase equality and social inclusion	+	CP12.7 requires development to be inclusive and accessible, which should help to ensure that the needs of people with certain protected characteristics are considered. However, this is very strategic in nature.	+	SPD02 provides some guidance which should help to ensure the needs of people with certain protected characteristics are met e.g. through shop front design and access for disabled people. Overall impacts should be positive and similar to option 1, as although the SPDs	?	This option would result in a generic Place-making policy that would be applicable to all forms of development including shop fronts and advertisements. It is unknown whether a Place-making policy would incorporate requirements relating to increasing equalities, as this maybe	?	Although this option would result in a policy that is specific to shop fronts and advertisements, it is uncertain whether this would include requirements relating to increasing equalities as this may be outside the scope of the policy. Impacts are therefore

				provide additional guidance, they do not set policy.		outside the scope of the policy. Impacts are therefore uncertain.		uncertain. Impacts could be more positive if the policy include requirements relating to this objective.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	0	The retail economy forms an important part of the local economy. Attractive shop-fronts are therefore important in supporting this economy. This option provides little policy guidance that is specific to shop fronts and this could be of detriment to the local retail economy. However overall impacts are considered to be neutral.	+	Although SPDs cannot set policy, SPD02 provides guidance which will be considered in shop front development. This should have positive impacts on this objective, thorough helping to bring forward visually attractive shop fronts, that could help support the retail economy. Advertisements and signs are also important in promoting economic activity, and SPD07 should also help to bring forward advertisements that are acceptable and further support economic activity.	+	This option would result in a generic Place-making policy that would be applicable to all forms of development including shop fronts and advertisements. This should have positive effects on this objective, as should ensure that good design in general is delivered in general, which will include retail developments and shopfronts, however may miss some of the specific considerations in relation to shop fronts which could significantly boost economic activity.	++	This option should result in well-designed shopfronts, which contribute towards creating a visually attractive environment. This could have significant positive impacts on this objective through boosting economic activity, particularly retail activity.

### Summary

#### Option 1 – NPPF and CPP1 only

- This option was found to have positive impacts on objectives relating to health, community safety and equalities. This option requires consideration of these issues and should therefore result in development that does not have amenity impact e.g. light pollution, should result in design that deters crime and development that is inclusive and adaptable.

- This option was found to have positive uncertain impacts on objectives relating to heritage assets/built environment. However, although this option sets the strategic requirements in relation to design, these are very high level and may not be specific enough for these types of developments.
- In contrast with other options, this option was found to have no impacts on the objective for economic development, as there is no requirement relating to shop fronts, with retail forming an important part of the local economy, and potentially therefore missing the opportunity to support the retail economy.

#### **Option 2 – NPPF, CPP1 and adopted SPDs**

- This option was found to have positive impacts on objectives for heritage assets/built environment, health, community safety, equalities and economic development. This option provides guidance, although not policy, on shop-front design and should therefore help to ensure good quality designed shop fronts are delivered which contribute towards the wider streetscape and conserve heritage assets; should help to minimise any adverse amenity impacts, e.g. through consideration of lighting; should encourage development to consider features which design out crime; and should encourage development to consider meeting any equalities needs.
- It should be noted that although option 2 provided more detailed information than option 1, the impacts were fairly similar, due to SPDs only providing guidance and not policy.

#### **Option 3 – Include within Place-making Policy**

- This option was found to have positive impacts on economic development. A generic policy should generally help to deliver well-designed developments, including shop-fronts, and could therefore help to promote economic activity within this sector.
- This option was found to have positive uncertain impacts on objectives for heritage assets/built environment and health. A generic policy should help to deliver well-designed developments, which contribute positively towards the streetscape and built environment and which minimise amenity impacts, however may not adequately cover the special features of shop front design, nor consider advertisements in relation to these objectives.
- This option was found to have uncertain impacts on objectives for community safety and equalities. A generic place-making policy may not incorporate specific requirements for how shop fronts could tackle community safety or increase equalities, as this maybe outside the scope of a generic policy.

#### **Option 4 – Specific policy supported existing SPDs**

- This option was found to have significantly positive impacts on objectives for heritage assets/built environment and economic development. This option should result in well-designed shop fronts and appropriate advertisements, that contribute towards a quality streetscape and consider impacts on heritage assets and the built environment. In particular, an attractive retail environment should help to support the retail-based economy.

- This option was found to have positive impacts on health. This option should result in a well-designed and attractive streetscape, which can help to support good mental well-being, as well as consider issues such as amenity impacts, having a positive outcome on health.
- This option was found to have positive uncertain impacts on objectives relating to community safety. This option would include requirements in relation to the safety of advertisements, (e.g. on road safety), however it is unknown whether this option would include any further requirements relating to deterring/designing out crime as this may be outside the scope of the policy.
- This option was found to have uncertain impacts on equalities. This option may provide the opportunity to consider how to ensure equalities requirements of relevance to shop fronts and advertisements are met, e.g. ensuring adequate disabled access, however this may be outside the scope of the this policy topic area.

### Preferred Option

- Option 4 is the preferred approach. In particular, this option should have a significant positive impact on the key objectives for this topic area: objectives for the heritage assets/built environment and economic development. This option should result in well-designed shop-fronts, that take into consideration the surrounding built environment, including heritage assets, and that make a positive contribution to the street-scape, helping to support a thriving retail sector. This option could also result in positive impacts for community safety and equalities if the policy includes requirements that consider these issues in relation to shop fronts and advertisements.

### CPP2 Options Appraisal: DM25 Telecommunications Apparatus

#### Options:

1. No specific development management policy to assess telecommunications applications rely on the NPPF/NPPG and other City Plan Policies to address issues of heritage, amenity and appearance.
2. Criteria based telecommunications policy

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	-	Telecoms apparatus could have an adverse impact on biodiversity depending on where they are situated and whether cables are located above or below ground. NPPF para 42-46 does not	+?	A criteria based policy may help to avoid an adverse impact on biodiversity and could result in a positive impact through the protection of important ecological sites. This would depend on the policy including consideration of biodiversity/nature



		specifically include the consideration of biodiversity/ecological impacts. Reliance on NPPF and other City Plan policies could result in biodiversity issues being less of a consideration for this type of development.		conservation issues.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-	Telecoms apparatus could have an adverse impact on the SDNP and its setting depending on where they are situated and whether cables are located above or below ground. NPPF para 42-46 does not specifically include the consideration of impacts on important landscapes, although does specify that equipment should be camouflaged on new sites. Reliance on NPPF and other City Plan policies could result in landscape issues being less of a consideration for this type of development.	+?	A criteria based policy may help to avoid an adverse impact on the SDNP and its setting and could result in a positive impact through the protection of landscape features. This would depend on the policy including consideration of issues on landscape.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-	Telecoms apparatus could have an adverse impact on heritage assets and their settings as well as on the built environment and visual amenity, depending on where they are situated. NPPF para 42-46 does not specifically include the consideration of impacts on heritage assets or townscapes, although does specify that equipment should be camouflaged on new sites. Reliance on NPPF and other City Plan policies could result in heritage and townscape issues being less of a consideration for this type of development.	+?	A criteria based policy may help to avoid an adverse impact on heritage assets and their settings, and on townscape and could result in a positive impact through the protection of assets. This would depend on the policy including consideration of issues regarding heritage assets and townscape.
15. To improve the range, quality and accessibility of services and facilities.	+	This option will enable telecoms infrastructure to be delivered and therefore contributes to providing access to telecoms as a service. In addition, access to internet and communications networks plays a vital role in delivery of certain services, as well as ensuring communities remain	+	This option will enable telecoms infrastructure to be delivered and therefore contributes to providing access to telecoms as a service. In addition, access to internet and communications networks plays a vital role in delivery of certain services, as well as ensuring communities remain connected to them.

		connected to them.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	Telecoms infrastructure is essential for sustainable economic growth. This option will enable telecoms infrastructure to be delivered and therefore contributes to supporting economic growth.	+	Telecoms infrastructure is essential for sustainable economic growth. Although potentially a more restrictive approach than option 1, a criteria based policy could provide greater clarity for industry with regards to the suitability of proposals. This could help development come forward in appropriate locations. Impacts are considered to be positive.

### Option 1

- There are 3 objectives where this option has potential to have an adverse effect (biodiversity, SDNP and heritage assets) and where this option performed worse than the other option. Lack of a local policy could result in less consideration of the impacts of telecoms infrastructure on biodiversity and nature conservation, the SDNP, and/or heritage assets, townscape and visual amenity.
- As with option 2, this option is considered to have a neutral impact on health, with international guidelines in place to ensure the levels of radiation emitted from telecoms infrastructure do not exceed a certain limit.
- As with option 2, this option is considered to have a positive impact on access and economic development, with delivery of telecoms infrastructure vital in ensuring access to certain services (e.g. internet-based services) and essential for economic growth.

### Option 2

- As with option 1, this option is considered to have a neutral impact on health.
- As with option 2, this option is considered to have a positive effect on access and economic development.
- This option also has potential to have a positive effect biodiversity, SDNP and heritage assets, however depends on criteria being included in the policy to address these matters and is therefore also uncertain.

### Preferred Option

- Option 2 is considered to have greater potential for positive impact than option 1, particularly against certain site-based objectives which cover important areas e.g. nature conservation designations. However this depends on the policy including certain criteria to address site specific matters.

- Option 2 is potentially the more restrictive approach, however this is not considered to impact on economic development or growth and may help to provide certainty to industry with regards to suitable and appropriate locations for infrastructure.

## CPP2 Options Appraisal – DM26 Conservation Areas

### Issues and Options

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Conservation Areas

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	Some Conservation Areas include Sites of Nature Conservation Interest and/or areas of ancient woodland. Street trees can also contribute to the Conservation Area designation. Protection of Conservation Areas would be achieved through this option, and this could have an indirect positive effect on this objective through	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

		the potential to also conserve biodiversity.						
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+?	Some Conservation Areas include areas of open space and this can form part of their designation. Protection of Conservation Areas would be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also protect open spaces which are situated within them.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+?	Some Conservation Areas, or parts of them are situated within the SDNP or its setting. Protection of Conservation Areas would be achieved through this option, and this could have an indirect positive effect on this objective through	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

		the potential to also protect or conserve the SDNP/its setting.						
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	This option should result in positive effects for this objective. The NPPF does not include Conservation Areas as one of the assets to which either substantial harm or loss should be exceptional or wholly exceptional. However, the NPPF requires great weight to be given to any designated asset's conservation and sets out some justification for where harm or loss would be acceptable. The NPPF recognises that not all elements of a Conservation Area contribute to its significance. CP15 requires conservation and enhancement of historic environment	+	Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1. In addition, SPD09 Architectural Features already covers many matters.	+	This option would result in a generic policy that would be applied to all designated and undesignated heritage assets. This includes Conservation Areas. However, this option may not enable the difference in the significance of the heritage assets to be considered fully and may not provide further clarity for applicants on considerations specific to Conservation Areas.	++	This option would result in a policy that contains specific criteria and considerations that are applicable only to Conservation Areas and should ensure specific issues are addressed. This option should result in a more significant positive impact on this key objective.  It could also provide the opportunity to have a local dimension.  A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.

		in accordance with the significance of the asset, with greatest weight given to designated assets.						
9. To reduce emissions of greenhouse gases that cause climate change	+	CP15 policy point 2 provides for proposals that may affect heritage assets but which may have a positive effect for climate change mitigation. This could include measures which improve energy efficiency for example. Impacts could therefore be positive depending on implementation.	+	Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1. In addition, PAN 08 External wall installation and PAN 09 Guidance on energy efficiency for houses in Conservation Areas already provide guidance on this issue.	+	It is considered unlikely that a single policy on heritage assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15 as well as PAN08 and PAN09. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for this objective.	+	It is considered unlikely that a specific policy on Conservation Areas would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15, as well as PAN 08 and PAN09. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for this objective.
Summary	Regardless of which option is pursued, CPP1 CP15 policy point 2, which provides for proposals on heritage assets that have a positive effect for climate change mitigation, would still apply and this could result in positive effects for this objective. It is considered unlikely that either a generic or specific policy would include these matters due to existing adopted guidance that address these matters.							
12. To minimise and sustainably manage waste	+?	This option could result in the protection, retention and repair of buildings or other features within Conservation Areas.	+?	This option would result in the protection, retention and repair of buildings within Conservation Areas. This could have an indirect positive effect on this	+?	This option would result in the protection, retention and repair of buildings within Conservation Areas. This could have an indirect positive effect	+?	This option would result in the protection, retention and repair of buildings within Conservation Areas. This could have an indirect positive effect on this objective as may avoid the

		This could have an indirect positive effect on this objective as may avoid the need for demolition, which would ultimately produce waste.		objective as may avoid the need for demolition, which would ultimately produce waste.		on this objective as may avoid the need for demolition, which would ultimately produce waste.		need for demolition, which would ultimately produce waste.
13. To make the best use of land available	+	NPPF para 126 states that Local Plans should include a positive strategy for the conservation of the historic environment, which includes sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. This could include, for example, bringing empty buildings back into use. This could make a positive impact on this objective through making the best use of land (and buildings) available	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	The NPPF establishes certain criteria which should be taken into account when producing a Local Plan. This includes, for example the desirability to put heritage assets into viable uses (as described under Option 1). It is therefore assumed that a generic policy would include such a criteria and this may help bring back into use vacant buildings within Conservation Areas. This would have a positive impact on this objective.	+	As with option 3, it is assumed that a specific Conservation Area policy would include a criteria that supports putting heritage assets into viable uses consistent with their conservation, as indicated in the NPPF. This would have a positive impact on this objective as may help bring vacant buildings back into use.

		although will depend on implementation.						
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	NPPF and CP15 provide for the protection of heritage assets. Tourism is an important part of the local economy, and this includes heritage-based tourism. High level policy which protects the historic built environment would have a positive effect on this objective.	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	As described, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A generic policy would protect and conserve the historic built environment, including Conservation Areas and is therefore considered to have a positive effect on this objective.	+	As with the other options, a specific policy on Conservation Areas would provide for their conservation and protection and therefore support heritage based tourism associated with these assets. The clarity provided in a more detailed policy could also have an indirect positive effect on economic development, as could assist in bringing forward appropriate development, provided that it was not unduly restrictive.

## Summary

### Option 1

- Although the impact was positive on objective 4: protection and conservation of the city’s historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as it would not contain details of the specific planning considerations applicable to Conservation Areas, nor would it contain a local dimension.
- As with options 2, 3 and 4, this option had the potential to have indirect positive effects on biodiversity, open space and the SDNP, depending on the site, as the conservation or protection of Conservation Areas could also indirectly result in the conservation of biodiversity, open space or land within the setting of the SDNP that is situated within the Conservation Area, where relevant. This option also had the potential to have indirect positive effects on the reduction of waste, through the potential to restore/repair buildings which may otherwise become derelict/at risk of demolition.
- As with options 2, 3 and 4, this option was found to have a positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation. This option was also found to have a positive effect on economic development, based on the



contribution heritage based tourism makes towards the local economy; and on making the best use of land available, through the potential to put buildings within Conservation Areas into viable uses.

- There were no objectives where this option was found to have an adverse effect.

### **Option 2**

- Impacts were found to be the same as Option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

### **Option 3**

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as a generic policy would not contain details of the specific planning considerations applicable to Conservation Areas, although it may contain a local dimension.
- As with options 1, 2 and 4 this option had potential to have indirect positive effects on biodiversity, open space, the SDNP and waste minimisation.
- As with options 1, 2 and 4, this option was found to have a positive effect on climate change mitigation, economic development and making the best use of land.
- As with options 1, 2 and 4, there were no objectives where this option was found to have an adverse effect.

### **Option 4**

- This option had potential for stronger positive effect on objective 4: protection and conservation of the historic environment and therefore performed better than all other options against this key objective. This is due to the potential for a specific policy to address the planning considerations applicable to Conservation Areas, as well as being able to include a local dimension.
- In addition to the benefits to the local economy resulting from heritage-based tourism, this option also had potential for positive effects on economic development based on the clarity that could be provided for developers by a more detailed policy, which may assist in bringing forward suitable development. However, the policy would need to ensure it is not unduly restrictive otherwise the reverse effect may occur.
- As with options 1, 2 and 3 this option had potential to have indirect positive effects on biodiversity, open space, the SDNP and waste minimisation.
- As with options 1, 2 and 3, this option was found to have a positive effect on climate change mitigation and making the best use of land.
- As with options 1, 2 and 3, there were no objectives where this option was found to have an adverse effect.

### **Preferred Option**

- The key objective whereby the effects were found to differ slightly between options was objective 4: protection and conservation of the historic environment. Option 4 had the potential for a stronger positive effect than other options as a specific policy would allow for the specific planning

considerations for Conservation Areas to be addressed, and also has the added benefit of addressing any local issues specific to these assets and this is considered to be the key objective for this policy area.

- All options resulted in fairly similar impacts across most other objectives, including potential positive impacts for biodiversity, open space, the SDNP and waste minimisation; and positive impacts for climate change mitigation, economic development and making the best use of land. Although with the last objective regarding the best use of land, it is assumed that generic/specific policy would support proposals which brought buildings back into viable uses.
- Although the impacts on economic development were considered to be the same across all options, detailed policy as provided for by Option 4 could also provide greater certainty for when development would be acceptable. This may help to bring development forward, having economic benefits, provided the policy is not unduly restrictive.
- Option 4 is considered to be the preferred approach.

**CPP2 Options Appraisal – DM27 Listed Buildings**

**Issues and Options**

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Listed Buildings

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	Some Listed Buildings may provide habitats for certain species, e.g. bat or bird species. Protection of Listed Buildings would be achieved through this option, and this	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

		could have an indirect positive effect on this objective through the potential to also conserve biodiversity.						
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	There are some Listed Building situated within the SDNP, however CPP2 policy would not apply in this location. For those Listed Buildings located within the setting of the SDNP, the impacts on this objective are considered to be negligible.	0	Effects the same as option 1.	0	Effects the same as option 1.	0	Effects the same as option 1.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	This option should result in positive effects for this objective. The NPPF includes Listed Buildings as one of the types of assets to which either substantial harm or loss should be exceptional or wholly exceptional	+	Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1. In addition, SPD09	+	This option would result in a generic policy that would be applied to all designated and undesignated heritage assets. This includes Listed Buildings. However, this option may not enable the difference in the significance of the heritage assets to be	++	This option would result in a policy that contains specific criteria and considerations that are applicable only to Listed Buildings and should ensure specific issues are addressed. This option should result in a more significant positive impact on this key objective.  It could also provide the

		depending on their grade. The NPPF requires great weight to be given to any designated asset's conservation and sets out some justification for where harm or loss would be acceptable. CP15 requires conservation and enhancement of historic environment in accordance with the significance of the asset, with greatest weight given to designated assets.		Architectural Features already covers many detailed matters that may be of relevance to Listed Buildings.		considered fully and may not provide further clarity for applicants on considerations specific to Listed Buildings.		opportunity to have a local dimension.  A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.
9. To reduce emissions of greenhouse gases that cause climate change	+	CP15 policy point 2 provides for proposals that may affect heritage assets but which may have a positive effect for climate change mitigation. This could include measures which improve energy efficiency for example. Impacts	+	Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1. In addition, PAN 08 External wall installation already provides some guidance of relevance to this issue.	+	It is considered unlikely that a single policy on heritage assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15 as well as PAN08. However, CP15 would still be applicable and therefore impacts	+	It is considered unlikely that a specific policy on Listed Buildings would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15, as well as PAN 08. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for

		could therefore be positive depending on implementation.				would be the same as described for Option 1 for this objective.		this objective.
12. To minimise and sustainably manage waste	+?	This option could result in the protection, retention and repair of listed buildings. This could have an indirect positive effect on this objective as may avoid the need for demolition, which would ultimately produce waste.	+?	Effects as described for option 1.	+?	Effects as described for option 1.	+?	Effects as described for option 1.
13. To make the best use of land available	+	NPPF para 126 states that Local Plans should include a positive strategy for the conservation of the historic environment, which includes sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. This could include, for example, bringing	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	The NPPF establishes certain criteria which should be taken into account when producing a Local Plan. This includes, for example the desirability to put heritage assets into viable uses (as described under Option 1). It is therefore assumed that a generic policy would include such a criteria and this may help bring back into use empty listed buildings.	+	As with option 3, it is assumed that a specific Listed Building policy would include a criteria that supports putting heritage assets into viable uses consistent with their conservation, as indicated in the NPPF. This would have a positive impact on this objective as may help bring empty buildings back into use.

		empty listed buildings back into use. This could make a positive impact on this objective through making the best use of land (and buildings) available although will depend on implementation.				This would have a positive impact on this objective.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	NPPF and CP15 provide for the protection of heritage assets. Tourism is an important part of the local economy, and this includes heritage-based tourism. High level policy which protects the historic built environment would have a positive effect on this objective.	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	As described, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A generic policy would protect and conserve the historic built environment, including Listed Buildings and is therefore considered to have a positive effect on this objective.	+	As with the other options, a specific policy on Listed Buildings would provide for their conservation and protection and therefore support heritage based tourism associated with these assets. The clarity provided in a more detailed policy could also have an indirect positive effect on economic development, as could assist in bringing forward appropriate development, provided that it was not unduly restrictive.

## Summary

### Option 1

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as it would not contain details of the specific planning considerations applicable to Listed Buildings, nor would it contain a local dimension.
- As with options 2, 3 and 4, this option had the potential to have indirect positive effects on biodiversity, depending on the building, as the conservation or protection of Listed Buildings could also indirectly result in the conservation of biodiversity that makes use of the building e.g. as habitat. This option also had the potential to have indirect positive effects on the reduction of waste, through the potential to restore/repair buildings which may otherwise become derelict/at risk of demolition.
- As with options 2, 3 and 4, this option was found to have a positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation. This option was also found to have a positive effect on economic development, based on the contribution heritage based tourism makes towards the local economy; and on making the best use of land available, through the potential to put listed buildings into viable uses where relevant.
- There were no objectives where this option was found to have an adverse effect.

### Option 2

- Impacts were found to be the same as Option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

### Option 3

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as a generic policy would not contain details of the specific planning considerations applicable to Listed Buildings, although it may contain a local dimension.
- As with options 1, 2 and 4 this option had potential to have indirect positive effects on biodiversity and waste minimisation.
- As with options 1, 2 and 4, this option was found to have a positive effect on climate change mitigation, economic development and making the best use of land.
- As with options 1, 2 and 4, there were no objectives where this option was found to have an adverse effect.

### Option 4

- This option had potential for stronger positive effect on objective 4: protection and conservation of the historic environment and therefore performed better than all other options against this key objective. This is due to the potential for a specific policy to address the planning considerations applicable to Listed Buildings, as well as being able to include a local dimension.
- In addition to the benefits to the local economy resulting from heritage-based tourism, this option also had potential for positive effects on economic development based on the clarity that could be provided for developers by a more detailed policy, which may assist in bringing forward suitable development. However, the policy would need to ensure it is not unduly restrictive otherwise the reverse effect may occur.
- As with options 1, 2 and 3 this option had potential to have indirect positive effects on biodiversity and waste minimisation.
- As with options 1, 2 and 3, this option was found to have a positive effect on climate change mitigation and making the best use of land.
- As with options 1, 2 and 3, there were no objectives where this option was found to have an adverse effect.

### **Preferred Option**

- The key objective whereby the effects were found to differ slightly between options was objective 4: protection and conservation of the historic environment. Option 4 had the potential for a stronger positive effect than other options as a specific policy would allow for the specific planning considerations for Listed Buildings to be addressed, and also has the added benefit of addressing any local issues specific to these assets and this is considered to be the key objective for this policy area.
- All options resulted in fairly similar impacts across most other objectives, including potential positive impacts for biodiversity and waste minimisation; and positive impacts for climate change mitigation, economic development and making the best use of land. Although with the last objective regarding the best use of land, it is assumed that generic/specific policy would support proposals which brought listed buildings back into viable uses.
- Although the impacts on economic development were considered to be the same across all options, detailed policy as provided for by Option 4 could also provide greater certainty for when development would be acceptable. This may help to bring development forward, having economic benefits, provided the policy is not unduly restrictive.
- Option 4 is considered to be the preferred approach.

## **CPP2 Options Appraisal – DM28 Locally Listed Heritage Assets**

### **Issues and Options**

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Locally Listed Heritage Assets



SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	Some locally listed buildings or open spaces may provide habitats for certain species or may form part of the wider green network. The protection of Locally Listed Assets would be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also conserve biodiversity.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	The Local List contains areas of open spaces of various typologies including Parks and Gardens, Outdoor Sports, Cemeteries, and Natural & Semi-natural. The protection of the locally listed open spaces would be achieved through	+	Effects the same as option 1.	+	Effects the same as option 1.	++	As the Locally Listed Assets also contain numerous open spaces of various typologies, this option could result in greater protection or improvements of these open spaces. This would result in a more significant positive effect than other options.

		<p>this option, and this could have an indirect positive effect on this objective through the potential to also protect open spaces which are situated within them.</p>						
<p>4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites</p>	+	<p>This option should result in positive effects for this objective. The NPPF paragraph 135 requires the effects of applications on non-designated heritage assets to be taken into account. This includes Locally Listed Assets. CP15 requires conservation and enhancement of historic environment in accordance with the significance of the asset, with greatest weight given to designated assets and refers to the Conservation Strategy to support</p>	+	<p>Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1. In addition, PAN 07 Local List of Heritage Assets already provides greater details on how locally listed assets should be considered.</p>	+	<p>This option would result in a generic policy that would be applied to all designated and undesignated heritage assets. This includes Locally Listed Assets. However, this option may not provide clarity for applicants on considerations specific to Locally Listed Assets.</p>	++	<p>This option would result in a policy that contains specific criteria and considerations that are applicable only to Locally Listed Assets and should ensure specific issues are addressed. This option should result in a more significant positive impact on this key objective.</p> <p>It could also provide the opportunity to have a local dimension.</p> <p>A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.</p>

		other local designations.						
8. To reduce the risk from all sources of flooding to and from development	+	As described under Objective 2, some Locally Listed Heritage Assets includes areas of open spaces. This option will help to protect these open space and this will have an indirect positive effect regarding reducing flood risk, based on the role that the natural environment and open spaces play in water absorption.	+	Effects the same as option 1.	+	Effects the same as option 1.	+	Effects the same as option 1.
9. To reduce emissions of greenhouse gases that cause climate change	+	CP15 policy point 2 provides for proposals that may affect heritage assets but which may have a positive effect for climate change mitigation. This could include measures which improve energy efficiency for example. Impacts could therefore be	+	Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1. In addition, PAN 08 External wall installation already provides some guidance of relevance to this issue, as does PAN 09 Guidance on energy	+	It is considered unlikely that a single policy on heritage assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15 as well as PAN08 and PAN09. However, CP15 would still be applicable and therefore impacts	+	It is considered unlikely that a specific policy on Locally Listed Heritage Assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15, as well as PAN 08 and PAN 09. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for

		positive depending on implementation.		efficiency for historic houses in Conservation Areas.		would be the same as described for Option 1 for this objective.		this objective.
10. To increase the city's resilience and ability to adapt to climate change	+	As described under Objective 2, some Locally Listed Heritage Assets includes areas of open space, some of which are of a naturalised form. This option will result in consideration of Assets on the Local List including open space, and this will have an indirect positive effect in helping with climate change adaptation, based on the role that the natural environment and open spaces play in water absorption and reducing flood risk, and also helping to maintain urban temperatures.	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.
12. To minimise and sustainably manage waste	+?	This option could result in the restoration, repair	+?	Effects as described for option 1.	+?	Effects as described for option 1.	+?	Effects as described for option 1.

		and retention of buildings or structures on the Local List. This could have an indirect positive effect on this objective as may avoid the need for demolition, which would ultimately produce waste.						
13. To make the best use of land available	+	NPPF para 126 states that Local Plans should include a positive strategy for the conservation of the historic environment, which includes sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. This could include, for example, bringing empty locally listed buildings back into use. This could make a positive impact on	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	The NPPF establishes certain criteria which should be taken into account when producing a Local Plan. This includes, for example the desirability to put heritage assets into viable uses (as described under Option 1). It is therefore assumed that a generic policy would include such a criteria and this may help bring back into use empty locally listed buildings, where relevant. This would have a positive impact on this objective.	+	As with option 3, it is assumed that a specific policy on Locally Listed Heritage Assets would support the use of these assets consistent with their conservation, as indicated in the NPPF. This would have a positive impact on this objective as may help bring empty buildings back into use.

		this objective through making the best use of land (and buildings) available although will depend on implementation.						
16. To improve health and well-being, and reduce inequalities in health	+	As described under Objective 2, some Locally Listed Heritage Assets include areas of open space. Access to open space can facilitate opportunities which promote physical activity and supports mental well-being, which will have a positive effect on health.	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	NPPF and CP15 provide for the protection of heritage assets. Tourism is an important part of the local economy, and this includes heritage-based tourism. High level policy which protects the	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	As described, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A generic policy would protect and conserve the historic built environment, including Locally Listed Assets and is therefore considered to have a	+	As with the other options, a specific policy on Locally Listed Assets would provide for their conservation and protection and therefore support heritage based tourism associated with these assets. The clarity provided in a more detailed policy could also have an indirect positive effect on economic

		historic built environment would have a positive effect on this objective.				positive effect on this objective.		development, as could assist in bringing forward appropriate development, provided that it was not unduly restrictive.
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**Summary**

**Option 1**

- Although the impact was positive on objective 4: protection and conservation of the city’s historic environment and heritage assets, this option did not perform as well as some of the other options (option 4) for this key objective, as it would not contain details of the specific planning considerations applicable to Locally Listed Heritage Assets, nor would it contain a local dimension.
- As with options 2 and 3 this option was found to have a direct positive effect on open space, due to some Locally Listed Assets containing various typologies of open spaces. However the impacts were not as strong as those associated with option 4 which was found to have greater potential for stronger positive impact on open space.
- As with options 2, 3 and 4, this option was also found to have a direct positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation, and on economic development, based on the contribution heritage based tourism makes towards the local economy.
- As with options 2, 3 and 4, this option had the potential to have indirect positive effects on biodiversity, depending on the building, as the conservation or protection of Locally Listed Assets could also indirectly result in the conservation of biodiversity that makes use of the building e.g. as habitat. In addition, the conservation or protection of open spaces which are on the Local List could also have benefits for biodiversity. The option could also have an indirect positive effect on reducing flood risk, adapting to climate change and improving health, as some Locally Listed Assets are open spaces that have a role in absorbing water and maintaining urban temperatures, and also allow for physical activity and provide for good mental well-being.
- As with options 2, 3 and 4, this option also had the potential to have indirect positive effects on the reduction of waste, through the potential to restore/repair/retain buildings which may otherwise become derelict/at risk of demolition, and an indirect positive effect on making the best use of land available, through the potential to retain locally listed buildings in viable uses.

**Option 2**

- Impacts were found to be the same as Option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

**Option 3**

- Although the impact was positive on objective 4: protection and conservation of the city’s historic environment and heritage assets, this option did not perform as well as option 4, as a generic policy would not contain details of the specific planning considerations applicable to Locally Listed Heritage Assets, although it may contain a local dimension.
- As with options 1 and 2, this option had potential to have a positive impact on open space, however the impact is not considered to be as strong as that associated with option 4.
- As with options 1, 2 and 4, this option had potential to have direct positive effects on climate change mitigation and on economic development.
- As with options 1, 2 and 4, this option had potential to have indirect positive effects on biodiversity, reducing flood risk, adapting to climate change, improving health, reducing waste and making the best use of land available.

#### **Option 4**

- This option had potential for stronger positive effect on objective 4: protection and conservation of the historic environment and therefore performed better than all other options against this key objective. This is due to the potential for a specific policy to address the planning considerations applicable to Locally Listed Heritage Assets, as well as being able to include a local dimension.
- This option had potential for stronger positive effects on objective 2: open space. This is because some Locally Listed Heritage Assets are also open spaces or contain elements of open space, which may be afforded greater protection or improvement through a specific policy.
- As with options 1, 2 and 3, this option was found to have a direct positive effect on climate change mitigation and economic development. In addition to the benefits to the local economy resulting from heritage-based tourism, this option also had greater potential for positive effects on economic development based on the clarity that could be provided for developers by a specific policy, which may assist in bringing forward suitable development.
- As with options 1, 2 and 3, this option had potential to have indirect positive effects on biodiversity, reducing flood risk, adapting to climate change and improving health, reducing waste and making the best use of land available.

#### **Preferred Option**

- The key objective whereby the effects were found to differ between options was objective 4: protection and conservation of the historic environment. Option 4 had the potential for a stronger positive effect than other options as a specific policy would allow for the specific planning considerations for Locally Listed Heritage Assets to be addressed, and also has the added benefit of addressing any local issues specific to these assets and this is considered to be the key objective for this policy area.
- Option 4 also had potential for stronger positive effect than other options for open space, based on the amount of Locally Listed Assets that are also open spaces and the additional layer of protection for these open spaces that this policy could result in.
- All options resulted in fairly similar impacts across most other objectives, including indirect positive impacts for biodiversity, flood risk, adapting to climate change, health, waste minimisation and making the best use of land; and direct positive impacts for climate change mitigation and economic development.



- Although the impacts on economic development were considered to be the same across all options, a specific policy as provided for by Option 4 could also provide greater certainty for when development would be acceptable. This may help to bring development forward, having economic benefits, provided the policy is not unduly restrictive.
- Option 4 is considered to be the preferred approach.

## CPP2 Options Appraisal – DM29 The Setting of Heritage Assets

### Issues and Options

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on The Setting of Heritage Assets

### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	The setting of some heritage assets could include, for example, gardens or grounds. These could provide habitats for certain species or may form habitat corridors. This option would result in the consideration of the setting of heritage assets, and this could have an indirect	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

		positive effect on this objective through the potential to also conserve biodiversity dependant on the site.						
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+?	The setting of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option would result in the consideration of the setting of heritage assets, and this could have an indirect positive effect on this objective through the potential to also protect areas of open space and green infrastructure, depending on the site.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
3. To protect, conserve and enhance the South Downs National Park and	+?	The setting of some heritage assets could include, for example, land situated within the SDNP or within	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

its setting, and improve sustainable access to it		the setting of the SDNP. This option would result in the consideration of the setting of heritage assets, and this could have an indirect positive effect on this objective through the potential to also protect the SDNP and its wider setting, depending on the site.						
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	This option should result in positive effects for this objective. The NPPF paragraph 129 requires the effects of applications on the setting of heritage assets to be taken into account. CP15 requires conservation and enhancement of historic environment in accordance with the significance of	+	Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	This option would result in a generic policy that would be applied to all designated and undesignated heritage assets. This would include the settings of heritage assets, however may not provide clarity about the specific considerations relating to setting.	++	This option would result in a policy that contains specific criteria and considerations of relevance to the setting of different types of heritage assets. It would also help to raise awareness around the importance of the setting of heritage assets. It should ensure specific issues are addressed and is likely to have a significant positive impact on this key objective as it will result in greater conservation of the heritage assets themselves.

		the asset, with greatest weight given to designated assets and their setting. The supporting text refers to opportunities to enhance the settings wherever possible, although this is not specifically within the policy text.						A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.
8. To reduce the risk from all sources of flooding to and from development	+?	The setting of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option will help to protect these open spaces and this will have an indirect positive effect regarding reducing flood risk, based on the role that the natural environment and open spaces play in water absorption, dependent on the site.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
9. To reduce	+	CP15 policy point 2	+	Although an SPD can	+	It is considered unlikely	+	It is considered unlikely that

emissions of greenhouse gases that cause climate change		provides for proposals that may affect heritage assets and their setting but which may have a positive effect for climate change mitigation. This could include measures which provide low/zero carbon energy for example. Impacts could therefore be positive depending on implementation.		provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as option 1.		that a single policy on heritage assets would also include additional information regarding climate change mitigation and heritage assets and their setting, as this is already provided for by CPP1 CP15. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for this objective.		a specific policy on the Setting of Heritage Assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for this objective.
10. To increase the city's resilience and ability to adapt to climate change	+?	The setting of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option will help to protect these spaces and this will have an indirect positive effect in helping with climate change adaptation, based on the role that the natural environment and open spaces play in	+?	Effects as described with Option 1.	+?	Effects as described with Option 1.	+?	Effects as described with Option 1.

		water absorption and reducing flood risk, and also helping to maintain urban temperatures.						
16. To improve health and well-being, and reduce inequalities in health	+	The settings of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option will help to protect these spaces and this will have an indirect positive effect on this objective. Access to open space can facilitate opportunities which promote physical activity and supports mental well-being, which will have a positive effect on health.	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment	+	NPPF and CP15 provide for the protection of heritage assets and their settings. Tourism is an important part of the	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot	+	As described, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A generic policy would protect and conserve	+	As with the other options, a specific policy on the Setting of Heritage Assets would provide for their conservation and protection and therefore support heritage based tourism

opportunities and meet local employment needs.		local economy, and this includes heritage-based tourism. High level policy which protects the historic built environment, which includes setting, would have a positive effect on this objective.		establish new policy and is therefore likely to result in an effect which is the same as Option 1.		the historic built environment, including assets' setting and is therefore considered to have a positive effect on this objective.		associated with these assets. The clarity provided in a more detailed policy could also have an indirect positive effect on economic development, as could assist in bringing forward appropriate development within the settings of heritage assets, provided that it was not unduly restrictive.
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### Summary

#### Option 1

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4) for this key objective, as it would not contain details of the specific planning considerations applicable to the setting of heritage assets.
- As with options 2, 3 and 4 this option was found to have an indirect positive effect on biodiversity, as conservation/protection of the setting of heritage assets could include grounds, gardens or open space which are also habitats or form important wildlife corridors; on open space, due to some settings containing various types of open/green spaces; on the SDNP, as the setting of heritage assets may also help to conserve the SDNP and its setting, and on reducing flood risk, adapting to climate change and improving health, as some settings include grounds/open spaces that have a role in absorbing water and maintaining urban temperatures, and also allow for physical activity and provide for good mental well-being.
- As with options 2, 3 and 4, this option was also found to have a direct positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation, and on economic development, based on the contribution heritage based tourism makes towards the local economy.

#### Option 2

- Impacts were found to be the same as Option 1 and 3, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

### **Option 3**

- Impacts were found to be the same as Options 1 and 2, as although a generic policy could include some detail on setting, it may not provide any further clarification or guidance as already included within the NPPF or CPP1 CP15.

### **Option 4**

- This option had potential for stronger positive effect on objective 4: protection and conservation of the historic environment and therefore performed better than all other options against this key objective. This is due to the potential for a specific policy to address the planning considerations applicable to the setting of heritage assets, as well as being able to include a local dimension.
- As with options 1, 2 and 3, this option was found to have a direct positive effect on climate change mitigation and economic development. In addition to the benefits to the local economy resulting from heritage-based tourism, this option also had the possibility for positive effects on economic development based on the clarity that could be provided for developers by a specific policy, which may assist in bringing forward suitable development within a setting.
- As with options 1, 2 and 3, this option had potential to have indirect positive effects on biodiversity, open space, SDNP, reducing flood risk, adapting to climate change and improving health.

### **Preferred Option/Overall summary**

- The key objective whereby the effects were found to differ between options was objective 4: protection and conservation of the historic environment. Option 4 had the potential for a stronger positive effect than other options as a specific policy would allow for the specific planning considerations for the setting of heritage assets to be addressed and this is considered to be the key objective for this policy area.
- All options resulted in fairly similar impacts across most other objectives, including indirect positive impacts for biodiversity, open space, the SDNP, flood risk, adapting to climate change, and health; and direct positive impacts for climate change mitigation and economic development.
- Although the impacts on economic development were considered to be the same across all options, a specific policy as provided for by Option 4 could also provide greater certainty for when development would be acceptable. This may help to bring development forward, having economic benefits, provided the policy is not unduly restrictive.
- Option 4 is considered to be the preferred approach.

## **CPP2 Options Appraisal – DM30 Registered Parks & Gardens**

### **Issues and Options**

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1



- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Registered Parks & Gardens

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	Some Registered Parks & Gardens include Sites of Nature Conservation Interest, Local Nature Reserves (declared/proposed) and/or areas of ancient woodland. Protection of Registered Parks & Gardens would be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also conserve biodiversity.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
2. To protect and improve open space and green infrastructure and improve sustainable	+	All Registered Parks & Gardens include areas of open space of various typologies including Parks and Gardens,	+	Effects the same as option 1.	+	Effects the same as option 1.	++	

access to it		Outdoor Sports, Cemeteries, Natural & Semi-natural, and privately owned parks & gardens. Some of these open space designations will make up part of the Registered Park & Garden designation. Protection of Registered Parks & Gardens would be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also protect open spaces which are situated within them.						
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+?	The Stanmer Park Registered Park & Garden is situated partly within the SDNP or within its setting. Protection of Registered Parks & Gardens would be achieved through	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

		this option, and this could have an indirect positive effect on this objective through the potential to also protect or conserve the SDNP/its setting.						
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	This option should result in positive effects for this objective. The NPPF includes Registered Parks & Gardens as one of the types of assets to which either substantial harm or loss should be exceptional or wholly exceptional depending on their grade. The NPPF requires great weight to be given to any designated asset's conservation and sets out some justification for where harm or loss would be acceptable. CP15 requires conservation and	+	Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	This option would result in a generic policy that would be applied to all designated and undesignated heritage assets. This includes Registered Parks & Gardens. However, this option may not enable the difference in the significance of the heritage assets to be considered fully and may not provide further clarity for applicants on considerations specific to Registered Parks & Gardens.	++	This option would result in a policy that contains specific criteria and considerations that are applicable only to Registered Parks & Garden and should ensure specific issues are addressed. This option should result in a more significant positive impact on this key objective.  It could also provide the opportunity to have a local dimension.  A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.

		enhancement of historic environment in accordance with the significance of the asset, with greatest weight given to designated assets.						
8. To reduce the risk from all sources of flooding to and from development	+	As described under Objective 2, all Registered Parks & Gardens are also open spaces, some of which are of a naturalised form. This option will lead to the protection of Registered parks & Gardens, and this will have an indirect positive effect regarding reducing flood risk, based on the role that the natural environment and open spaces play in water absorption.	+	Effects the same as option 1.	+	Effects the same as option 1.	+	Effects the same as option 1.
9. To reduce emissions of greenhouse gases that cause climate change	+	CP15 policy point 2 provides for proposals that may affect heritage assets but which may have a positive effect for	+	Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to	+	It is considered unlikely that a single policy on heritage assets would also include additional information regarding climate change	+	It is considered unlikely that a specific policy on Registered Parks & Gardens would also include additional information regarding climate change

		climate change mitigation. Impacts could therefore be positive depending on implementation.		result in an effect which is the same as Option 1.		mitigation and heritage assets, as this is already provided for by CPP1 CP15. Impacts would be the same as described for Option 1 for this objective.		mitigation and heritage assets, as this is already provided for by CPP1 CP15. Impacts would be the same as described for Option 1 for this objective.
10. To increase the city's resilience and ability to adapt to climate change	+	As described under Objective 2, all Registered Parks & Gardens are also open spaces, some of which are of a naturalised form. This option will lead to the protection of Registered parks & Gardens, and this will have an indirect positive effect in helping with climate change adaptation, based on the role that the natural environment and open spaces play in water absorption and reducing flood risk, and also helping to maintain urban temperatures.	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.
16. To improve health and well-	+	As described under Objective 2, all	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.

being, and reduce inequalities in health		Registered Parks and Gardens include areas of open space. Access to open space can facilitate opportunities which promote physical activity and supports mental well-being, which will have a positive effect on health.						
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	NPPF and CP15 provide for the protection of heritage assets including Registered Parks & Gardens which locally includes the Royal Pavilion Estate. Tourism is an important part of the local economy, and this includes heritage-based tourism. High level policy which protects the historic environment would have a positive effect on this objective.	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	As described, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A generic policy would protect and conserve the historic built environment, including Registered Parks & Gardens and is therefore considered to have a positive effect on this objective.	+	As with the other options, a specific policy on Registered Parks & Gardens would provide for their conservation and protection and therefore support heritage based tourism associated with these assets. The clarity provided in a more detailed policy could also have an indirect positive effect on economic development, as could assist in bringing forward appropriate development, provided that it was not unduly restrictive.

## Summary

### Option 1

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4) for this key objective, as it would not contain details of the specific planning considerations applicable to Registered Parks & Gardens, nor would it contain a local dimension.
- As with options 2, 3 and 4, this option had the potential to have indirect positive effects on biodiversity and the SDNP, as the protection of Registered Parks & Gardens could also indirectly result in the conservation of biodiversity or land within, or within the setting of the SDNP, where relevant. It could also have an indirect positive effect on reducing flood risk, adapting to climate change, and improving health, as all Registered Parks & Garden include areas of open space and natural environment that play a role in absorbing water and maintaining urban temperatures, and also allow for physical activity and provide for good mental well-being.
- As with options 2, and 3 this option was found to have a direct positive effect on open space, due to all Registered Parks & Gardens containing various typologies of open spaces, some of which will form part of their designation. However the impacts were not as strong as those associated with option 4 which was found to have greater positive impact on open space. It was also found to have a direct positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation and on economic development, based on the contribution heritage based tourism makes towards the local economy

### Option 2

- Impacts were found to be the same as Option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

### Option 3

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as a generic policy would not contain details of the specific planning considerations applicable to Registered Parks & Gardens, although it may contain a local dimension.
- As with options 1, 2 and 4 this option had potential to have indirect positive effects on biodiversity, the SDNP, reducing flood risk, adapting to climate change and improving health.
- As with options 1 and 2, this option was found to have a direct positive effect on open space, climate change mitigation and economic development. However impacts on open space were not as positive as with option 4.

### Option 4

- This option had potential for stronger positive effect on objective 4: protection and conservation of the historic environment and therefore performed better than all other options against this key objective. This is due to the potential for a specific policy to address the planning considerations applicable to Registered Parks & Gardens, as well as being able to include a local dimension.
- This option had potential for stronger positive effects on objective 2: open space. This is because all Parks & Gardens contains elements of open space, which may be afforded greater protection through a specific policy.
- As with options 1, 2 and 3 this option had potential to have indirect positive effects on biodiversity, the SDNP, reducing flood risk, adapting to climate change and improving health.
- As with options 1, 2 and 3, this option was found to have a positive effect on climate change mitigation and economic development.
- In addition to the benefits to the local economy resulting from heritage-based tourism, this option also had potential for positive effects on economic development based on the clarity that could be provided for developers by a more detailed policy, which may assist in bringing forward suitable development. However, it is not known whether this would apply to Registered Parks & Gardens in the same way as it effects other heritage assets.

### **Preferred Option**

- The key objective whereby the effects were found to differ slightly between options was objective 4: protection and conservation of the historic environment. Option 4 had the potential for a stronger positive effect than other options as a specific policy would allow for the specific planning considerations for Registered Parks and Gardens to be addressed, and also has the added benefit of addressing any local issues specific to these assets and this is considered to be the key objective for this policy area.
- Option 4 also performed better than other options on the objective for open space.
- All options resulted in fairly similar impacts across most other objectives, including indirect positive impacts for biodiversity, the SDNP, flood risk, adapting to climate change and health; and direct positive impacts for open space, climate change mitigation, and economic development.
- Although the impacts on economic development were considered to be the same across all options, detailed policy as provided for by Option 4 could also provide greater certainty for when development would be acceptable.
- Option 4 is considered to be the preferred approach.

## **CPP2 Options Appraisal – DM31 Archaeological Sites and Monuments**

### **Issues and Options**

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.



- Option 4) Have a specific policy in CPP2 on Archaeological Sites and Monuments

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	Ancient Monuments and other important archaeological sites could also have biodiversity interest or importance. Conservation of archaeological sites/SMs would be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also conserve biodiversity.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+?	Ancient Monuments and other important archaeological sites could be situated within areas of open space. Conservation of archaeological sites and their settings would be achieved through this option, and this	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.

		could have an indirect positive effect on this objective through the potential to also protect open space within which they are situated.						
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+?	Ancient Monuments and other important archaeological sites could be situated within the SDNP or its setting. Conservation of archaeological sites and their settings would be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also protect or conserve the SDNP/its setting.	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.
4. To protect and conserve the city's historic built environment, heritage assets and their	+	This option should result in positive effects for this objective. The NPPF includes SMs as one of the assets of highest significance	+	Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot	+	This option would result in a generic policy that would be applied to all designated and undesignated heritage assets. However, this may not enable the	++	This option would result in a policy that contains specific criteria and consideration that are applicable only to SMs and archaeological sites.

<p>settings, townscapes, buildings and archaeological sites</p>		<p>to which substantial harm or loss should be wholly exceptional. The NPPF requires great weight to be given to an asset's conservation and sets out some justification for where harm or loss would be acceptable. The NPPF requires the submission of a DBA where a site has potential for archaeological interest and requires the policies for designated heritage assets to be applied to assets of archaeological interest if they are considered to be of equivalent significance to SMs. CP15 requires conservation and enhancement of historic environment in accordance with the significance of</p>		<p>establish new policy and is therefore likely to result in an effect which is the same as Option 1 and unlikely to result in an effect which is as positive as Options 3 or 4.</p>		<p>difference in the significance of the heritage assets to be considered fully and may not provide further clarity for applicants on considerations specific to this type of site.</p> <p>In particular, archaeology raises notably different planning considerations to other forms of heritage asset. It is not known whether these could be adequately covered in a generic heritage asset policy.</p> <p>Although effects are still likely to be positive, there is also some uncertainty, particularly with regards to archaeology.</p>		<p>The policy could provide recognition of the significance of SMs. In addition, as archaeology raises different planning considerations to other forms of heritage asset, a specific policy could ensure these are adequately addressed.</p> <p>It could also provide the opportunity to have a local dimension.</p> <p>A specific policy would provide greater clarity to applicants and may help in bringing forward acceptable development.</p>
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		the asset, with greatest weight to designated assets. There is no specific reference within the policy to archaeological assets.						
9. To reduce emissions of greenhouse gases that cause climate change	+	CP15 policy point 2 provides for proposals that may affect heritage assets but which may have a positive effect for climate change mitigation. This could include renewable energy generation for example. Impacts could therefore be positive depending on implementation.	+	Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	It is considered unlikely that a single policy on heritage assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for this objective.	+	It is considered unlikely that a specific policy on SMs and archaeological sites would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15. However, CP15 would still be applicable and therefore impacts would be the same as described for Option 1 for this objective.
13. To make the best use of land available	?	Uncertain whether the NPPF policy on heritage and CP15 would result in the best use of land.	?	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which	?	It is unknown what effect a generic policy applicable to all heritage assets could have on this objective. For instance, if criteria provides for the development of previously developed land, whilst protecting	?	Impacts are considered to be uncertain and similar to option 3.  Due to the geographical location of SMs, any policy specific to SMs are unlikely to result in any impact on this objective.

				is the same as Option 1.		heritage assets, then impacts could be positive. Many heritage assets are located within the built up area, and many archaeological sites in particular are located on previously developed land and therefore the policy should ensure it is not unduly restrictive in that it would prevent development from coming forward in these locations. It is considered unlikely that a generic policy would include the specific considerations relating to archaeological sites and redevelopment.		It is unknown what effect a policy applicable to archaeological sites could have on this objective. E.g. if criteria provides for the development of previously developed land, whilst protecting archaeological sites, then impacts could be positive. As many archaeological sites are located on previously developed land the policy should ensure it is not unduly restrictive in that it would prevent development from coming forward in these, or other locations.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment	+	NPPF and CP15 provide for the protection of heritage assets. Tourism is an important part of the economy, although heritage-based tourism is perhaps less associated with	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which	+	As with option 1, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A generic policy would protect and conserves the historic built environment, and is therefore considered to	+	As with the other options, a specific policy on SMS and archaeological sites would provide for their conservation and protection and therefore support heritage based tourism associated with these assets. The clarity provided in a

needs.		SMs and archaeological sites, than other types of heritage asset. High level policy which protects the historic built environment would have a positive effect on this objective.		is the same as Option 1.		have a positive effect on this objective.		more detailed policy could also have an indirect positive effect on economic development, as could assist in bringing forward appropriate development, provided that it was not unduly restrictive.
Summary	All options should result in positive effects for economic development. All will provide for the protection and conservation of heritage assets, including specifically SMs and archaeological sites. These form an important part of the heritage assets that contribute towards Brighton & Hove being attractive for those interested in heritage-based tourism. Option 4, may also provide greater clarity on when development will be acceptable, and this may also have an indirect positive effect on economic development as may help to bring forward sites in suitable locations, provided the policy is not unduly restrictive.							

## Summary

### Option 1

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as it would not contain details of the specific planning considerations applicable to archaeology or Scheduled Monuments, nor would it contain a local dimension.
- As with options 2, 3 and 4, this option had the potential to have indirect positive effects on biodiversity, open space and the SDNP, depending on the site, as the conservation or protection of a Scheduled Monument or Archaeological site could also indirectly result in the conservation of biodiversity, open space or land within the setting of the SDNP.
- As with options 2, 3 and 4, this option was found to have a positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation. It was also found to have a positive effect on economic development, based on the contribution heritage based tourism makes towards the local economy.
- As with options 2, 3 and 4, this option was found to have uncertain impacts on making the best use of land, as it is uncertain on whether this option would result in regeneration of previously developed or other types of sites.

### Option 2

- Impacts were found to be the same as Option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as option 1.

### **Option 3**

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (option 4), as a generic policy would not contain details of the specific planning considerations applicable to archaeology or Scheduled Monuments, although it may contain a local dimension. Although effects are still likely to be positive, there is also some uncertainty, particularly with regards to archaeology
- As with options 1, 2 and 4 this option had potential to have indirect positive effects on biodiversity, open space and the SDNP.
- As with options 1, 2 and 4, this option was found to have a positive effect on climate change mitigation and economic development.
- As with options 1, 2 and 4, this option was found to have uncertain effects on making the best use of land available.
- As with options 1, 2 and 4, there were no objectives where this option was found to have an adverse effect.

### **Option 4**

- This option had potential for stronger positive effect on objective 4: protection and conservation of the historic environment and therefore performed better than all other options against this key objective. This is due to the potential for a specific policy to address the planning considerations applicable to archaeological sites and Scheduled Monuments, as well as being able to include a local dimension.
- In addition to the benefits to the local economy resulting from heritage-based tourism, this option also had potential for positive effects on economic development based on the clarity provided for developers by a more detailed policy, which may assist in bringing forward suitable development. However, the policy would need to ensure it is not unduly restrictive otherwise the reverse effect may occur.
- As with options 1, 2 and 3 this option had potential to have indirect positive effects on biodiversity, open space and the SDNP.
- As with options 1, 2 and 3, this option was found to have a positive effect on climate change mitigation and economic development.
- As with options 1, 2 and 3, this option was found to have uncertain effects on making the best use of land available.
- As with options 1, 2 and 3, there were no objectives where this option was found to have an adverse effect.

### **Preferred Option**

- The key objective whereby the effects were found to differ slightly between options was objective 4: protection and conservation of the historic environment. Option 4 had the potential for a stronger positive effect than other options as a specific policy would allow for the specific planning considerations for both types of assets/sites to be addressed, and also has the added benefit of addressing any local issues specific to these assets and this is considered to be the key objective for this policy area.

- All options resulted in fairly similar impacts across most other objectives, including potential positive impacts for biodiversity, open space and the SDNP; positive impacts for climate change mitigation and economic development; and uncertain impacts for making the best use of land.
- Although the impacts on economic development were considered to be the same across all options, detailed policy as provided for by Option 4 could also provide greater certainty for when development would be acceptable. This may help to bring development forward, having economic benefits, provided the policy is not unduly restrictive.
- The effects from all options on making the best use of land are uncertain. Many archaeological sites are located on previously developed land. If either option 3 or 4 was pursued, the policy should ensure it does not prevent the re-development/regeneration of previously developed or other sites, whilst still maintaining adequate and appropriate protection of heritage assets.
- Option 4 is likely to be the preferred approach.

### CPP2 Options Appraisal – DM32 Royal Pavilion Estate

#### Issues and Options

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in a site specific SPD
- Option 3) No site specific policy but rely on a combination of other policies in CPP2 covering the different types of heritage asset.
- Option 4) Have a specific policy in CPP2 on The Royal Pavilion Estate

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+?	The Royal Pavilion Estate does not include any ecological designations. However, there are areas of planting within the site, and the site is within the Nature Improvement	+?	Effects the same as option 1.	+?	Effects the same as option 1.	+?	Effects the same as option 1.



		<p>Area. It also forms part of the green network and may provide a refuge for wildlife in the centre of the city.</p> <p>Protection of the Estate would still be achieved through this option, and this could have an indirect positive effect on this objective through the potential to also conserve or address issues facing biodiversity.</p>						
<p>2. To protect and improve open space and green infrastructure and improve sustainable access to it</p>	+	<p>The Royal Pavilion Estate incorporates areas of open space of the Parks &amp; Gardens typology. Protection of the Estate would be achieved through this option, and this could have a direct positive effect on this objective through the potential to also protect open spaces</p>	+	<p>Effects the same as option 1.</p>	+	<p>Effects the same as option 1.</p>	++	<p>A site specific policy would provide the opportunity to address specific issues concerning the open spaces within the Royal Pavilion Estate and is therefore more likely to have a stronger positive impact on this objective.</p>

		which are situated within it.						
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	This option should result in positive effects for this objective. The NPPF includes Registered Parks & Gardens and Listed Buildings as the types of assets to which either substantial harm or loss should be exceptional or wholly exceptional depending on their grade. The NPPF requires great weight to be given to any designated asset's conservation and sets out some justification for where harm or loss would be acceptable. CP15 requires conservation and enhancement of historic environment in accordance with the significance of the asset, with	+	Impacts considered to be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	++	This option would rely on a range of other heritage policies in CPP2 to provide policy relating to the Estate. It is presumed this would include policies on Listed Buildings, Registered Parks & Gardens, and Conservation Areas, all of which would apply. The impacts of this option are still therefore considered to be strong, and similar to those of Option 4.  However, although the combination of these policies would provide strong policy guidance, they would be unlikely to contain any site specific consideration, unless these were specifically detailed in one of the policies, e.g. within the Registered Park & Garden policy.	++	This option would result in a policy that addresses site specific issues and considerations that are applicable only to the Royal Pavilion Estate, including temporary uses and structures. It would also raise awareness of the importance of the Estate as a whole.  This option should result in a strong positive impact on this key objective, however is likely to be similar to Option 3, based on the assumption that option 3 included separate policies on Registered Parks & Gardens, Listed Buildings and Conservation Areas.

		greatest weight given to designated assets.						
8. To reduce the risk from all sources of flooding to and from development	+	The Royal Pavilion Estate incorporates areas of open space. The area also forms part of a surface water flow route that runs down from the London Road and Lewes Road areas towards the seafront. Protection of the Royal Pavilion Estate could have an indirect positive effect regarding reducing flood risk, based on the role that open spaces play in water absorption.	+	Effects the same as option 1.	+	Effects the same as option 1.	+	Effects the same as option 1.
9. To reduce emissions of greenhouse gases that cause climate change	+	CP15 policy point 2 provides for proposals that may affect heritage assets but which may have a positive effect for climate change mitigation. Impacts could therefore be positive depending	+	Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	It is considered unlikely that individual policies on heritage assets would also include additional information regarding climate change mitigation and heritage assets, as this is already provided for by CPP1 CP15. Impacts	+	It is considered unlikely that a specific policy on the Royal Pavilion Estate would also include additional information regarding climate change mitigation as this is already provided for by CPP1 CP15. Impacts would be the same as described for Option 1 for this objective.

		on implementation.				would be the same as described for Option 1 for this objective.		
10. To increase the city's resilience and ability to adapt to climate change	+	As described under Objectives 2 and 8, the Royal Pavilion Estate includes open spaces. This option will lead to the protection of the Estate and this will have an indirect positive effect in helping with climate change adaptation, based on the role that the natural environment and open spaces play in water absorption and reducing flood risk, and also helping to maintain urban temperatures.	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.
16. To improve health and well-being, and reduce inequalities in health	+	As described under Objective 2, the Royal Pavilion Estate includes areas of open space. Access to open space can facilitate opportunities which promote physical	+	Effects as described with Option 1.	+	Effects as described with Option 1.	+	Effects as described with Option 1.

		activity and supports mental well-being, which will have a positive effect on health.						
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	NPPF and CP15 provide for the protection of heritage assets including Listed Buildings and Registered Parks & Gardens which locally includes the Royal Pavilion Estate. Tourism is an important part of the local economy, and this includes heritage-based tourism, with the Royal Pavilion being a key part. High level policy which protects the historic environment would have a positive effect on this objective.	+	Impacts considered to be the same as with option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.	+	As described, heritage based tourism is an important part of the tourism sector in Brighton & Hove. A number of separate policies would protect and conserve the Royal Pavilion and this option is therefore considered to have a positive effect on this objective.	++	As with the other options, a specific policy on The Royal Pavilion Estate would provide for its conservation and protection and therefore support heritage based tourism associated with this asset. However a site specific policy, which addresses local site-based considerations, such as temporary uses and structures would provide greater clarity on what would be permitted on this site. This clarity could have an additional indirect positive effect on economic development, as could assist in bringing forward appropriate development whilst still protecting the Estate. E.g. the temporary outdoor ice-rink/events during the Brighton Festival, which have economic benefits.

## Summary

### Option 1

- Although the impact was positive on objective 4: protection and conservation of the city's historic environment and heritage assets, this option did not perform as well as some of the other options (options 3 and 4) for this key objective, mainly because it would not contain details of the specific planning considerations or issues applicable to The Royal Pavilion Estate.
- As with options 2, 3 and 4, this option was found to have a direct positive effect on open space, due to the Estate containing designated open space, some of which will form part of the Estate's designation. However the positive impact on open space was not as strong as the impacts of option 4 for this objective.
- As with options 2, 3 and 4, this option was also found to have a direct positive effect on climate change mitigation, as policy CP15 provides for proposals which may have a positive effect for climate change mitigation.
- It was also found to have a direct positive impact on economic development, based on the contribution heritage based tourism makes towards the local economy. However the positive impact was not as strong as the impacts of option 4.
- As with options 2, 3 and 4, this option had the potential to have indirect positive effects on biodiversity, as the protection of the Estate could also indirectly result in the conservation of biodiversity. It could also have an indirect positive effect on reducing flood risk, adapting to climate change, and improving health, as the Estate includes areas of open space and natural environment that play a role in absorbing water and maintaining urban temperatures, and also allow for physical activity and provide for good mental well-being.

### Option 2

- Impacts were found to be the same as option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

### Option 3

- As with option 4, the impact was significantly positive on objective 4: protection and conservation of the city's historic environment and heritage assets. Although this option won't contain any site-specific considerations, it is considered that the Estate would be adequately protected by other relevant policies in CPP2 on Listed Buildings, Conservation Areas and Registered Parks & Gardens. It is questioned whether some of this site specific detail could be included in a more generic asset policy rather than having a site specific policy, e.g. could the policy on Registered Parks & Gardens include a sub-section relating to the Royal Pavilion Estate? The positive impacts of this option were greater than those of options 1 and 2 on this objective.
- As with options 1, 2 and 4, this option was found to have a direct positive effect on open space, climate change mitigation and economic development. However the positive impacts on open space and economic development were not as strong when compared to Option 4.

- As with options 1, 2 and 4 this option had potential to have indirect positive effects on biodiversity, reducing flood risk, adapting to climate change and improving health.

#### **Option 4**

- As with option 3, the impact was significantly positive on objective 4: protection and conservation of the historic environment. This is due to the potential for a specific policy to address the planning considerations applicable to the Royal Pavilion Estate, however was not dissimilar to Option 3, whereby protection would be addressed through individual policies covering heritage assets more broadly. It is questioned whether some of the site specific detail could be included in an individual asset-based policy rather than having a site specific policy, e.g. could the policy on Registered Parks & Gardens include a sub-section relating to the Royal Pavilion Estate?
- The impacts on open space were considered to be more significantly positive than all other options. This is because a site specific policy could provide the opportunity to address specific issues concerning the open spaces within the Royal Pavilion Estate. However, as described above, this could also be provided if an asset –based policy included a sub-section on the Royal Pavilion Estate.
- The impacts on economic development were also considered to be more significantly positive than all other options. This reflects the important role the Royal Pavilion plays in heritage-based tourism, but also because this option could provide clarity to applicants on when development may be suitable and recognises the economic benefits that temporary uses can bring, such as the ice-rink. However, again, this site specific detail could be included in an individual asset policy.
- As with options 1, 2 and 3 this option had potential to have indirect positive effects on biodiversity, reducing flood risk, adapting to climate change and improving health.
- As with options 1, 2 and 3, this option was found to have a positive effect on climate change mitigation.

#### **Preferred Option**

- Option 4 was considered to have greater potential for significant positive impact on objective 2: open space and objective 19: economic development.
- Options 3 and 4 were both considered to have potential for significant positive impact on the key relevant objective, objective 4: protection and conservation of the historic environment, although option 4 would allow more detailed site specific considerations.
- All options resulted in fairly similar impacts across most other objectives, including indirect positive impacts for biodiversity, flood risk, adapting to climate change and health; and direct positive impacts for climate change mitigation.
- Although option 4 has greater potential for positive impacts on certain objectives, option 3 could result in similar effects, but only if an individual policy covering a certain type of asset, including a sub-section on the Royal Pavilion Estate. E.g. the policy on Registered Parks & Gardens.

## Transport and Travel

### CPP2 Options Appraisal: DM33 Safe, Sustainable Travel

#### Options:

1: No additional policy – rely on CPP1 Policy CP9

2: Policy setting more detailed requirements regarding safe and sustainable/active travel

#### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	This option should have a positive effect for this objective, as may result in the improvement to sustainable access to open spaces, as specified under paragraph 4 of CP9.	+	This option should have a positive effect for this objective, as may result in the improvement to sustainable access to open spaces, although this is likely to be dependent on the location of new development.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	This option should have a positive effect for this objective, as may result in the improvement to sustainable access to the SDNP, as specified under paragraph 4 of CP9.	+	This option should have a positive effect for this objective, as may result in the improvement to sustainable access to the SDNP, although this is likely to be dependent on the location of new development.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	This option should have a significant positive effect on this objective, as policy CP9 sets the strategy and outlines various measures required to encourage sustainable travel.	++	This option should have a significant positive effect on this objective as a detailed policy on safe and sustainable travel will include measures that should increase and/or improve sustainable travel.
6. To improve air	+	This option should have an indirect positive effect	+	Effects the same as option 1.



and noise quality		on this objective. Any increases or improvements in sustainable travel should have an associated effect on air and noise quality, although it is recognised that buses contribute to poor air quality in certain areas of the city.		
9. To reduce emissions of greenhouse gases that cause climate change	+	This option should have an indirect positive effect on this objective. Any increases in sustainable travel should have an associated effect on reducing transport based carbon emissions.	+	Effects the same as option 1.
15. To improve the range, quality and accessibility of services and facilities.	++	This option should have a significant positive effect on this objective. CP9 policy point A2b seeks to improve access to significant uses and facilities by sustainable transport, better public realm and improved safety.	++	This option should have a significant positive effect on this objective. A detailed policy approach should help to improve access by walking, cycling and public transport.
16. To improve health and well-being, and reduce inequalities in health	++	This option should have a significant positive effect on this objective. CP9 policy point B4 promotes walking and cycling through improved public realm in certain areas, as well as promoting walking and cycling as a form of active travel. Any increases in active travel, combined with potential improvements to air quality, would have a positive effect on health.	++	This option should have a significant positive effect on this objective. A detailed policy approach, that helps to increase or facilitate travel on foot or by bike, would have a positive effect on health. In addition, any potential improvements to air quality would also be beneficial for health.
17. To improve community safety, and reduce crime and fear of crime	+	This option should have a positive effect on this objective. CP9 sets the strategy and outlines measures which should help to transfer people onto more sustainable forms of transport and therefore reduce traffic impacts including improving road safety.	++	This option should have a significant positive effect on this objective. This option is likely to provide greater detail on specific measures that will improve road safety.
18. To increase equality and social inclusion	+?	Lack of transport options and access can lead to social exclusion. This option could have an indirect positive effect through the potential to increase opportunities for travel that are more accessible	+?	As with option 1, this option could help to support social inclusion through provision of transport options and opportunities. A detailed policy approach could also have potential to include measures which improve travel for people

		and support social inclusion. However this is uncertain and will depend on take up by communities.		with protected characteristics.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	Congestion has a direct adverse impact on the economy. This option should lead to reduced congestion through improved sustainable transport and therefore is considered to have a positive effect on this objective.	+	Impacts the same as option 1.

### Summary

#### Option 1 – no policy

- Many of the impacts are considered to be similar to option 2 including positive impacts for: improving access to open space and the SDNP through increased transport options to these locations; improving air and noise quality and reducing carbon emissions through the potential to reduce journeys made by private car; increasing equalities and social inclusion, due to the potential availability of more accessible forms of transport, although would be dependent on take-up by communities; and supporting economic development through the potential to reduce congestion.
- This option was also found to have a positive impact for improving safety, through the potential improvements to road safety that would be associated with reduced congestion, although the positive impact was not as significant as option 2.
- As with option 2, significant positive impacts are anticipated for: reducing the need to travel by car and improving sustainable transport access through increased opportunities for cycling and walking; and improving health, through increased opportunities for active travel.

#### Option 2 – detailed policy

- Positive impacts likely to be the same as option 1 for: improving access to open space and the SDNP, improving air and noise quality, reducing carbon emissions, increasing equalities and social inclusion and supporting economic development.
- Significant positive impacts likely to be the same as option 1 for: reducing the need to travel by car, improving sustainable transport access, and improving health.
- In addition, option 2 has greater potential than option 1 for significant positive impacts for improving safety as could provide more details on specific measures that will improve road safety.

## Preferred Option

- Option 2 is considered to have greater potential for more significant positive impact for the safety objective due to this option being able to provide greater detail on specific measures for improving road safety, which is only addressed at a strategic level in CP9.
- Both options should have positive impacts on other relevant objectives and score similarly across most other objectives.
- It is recognised that option 2 is also likely to provide greater detail on measures which support walking, cycling and public transport than CP9, despite scoring the same across relevant objectives in this appraisal.
- Option 2 is considered to be the preferred approach.

## CPP2 Options Appraisal: DM34 Park & Ride, Coach and Lorry Park Policy Options

### Options

- 1) General criteria based policy in support of developments
- 2) Specific site allocations
- 3) No policy

### Assumptions/unknowns

- Site allocations for park and ride would be new sites allocated for formal/purpose-built park and ride, not existing car-parks (e.g. to be used as informal park and ride sites)
- Location of site allocations is unknown
- Amount of site allocations is unknown
- Assume that options 1 and 2 will both result in park and ride and parking sites being delivered
- The no policy approach could still result in sites coming forward for these types of parking development.

### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	-/0?	Sites for park and ride, coach and/or lorry parking could have an adverse impact on biodiversity depending on their location. The inclusion of	-/0?	Sites for parking could have an adverse effect on biodiversity depending on their location. If this option identified sites	-?	Lack of policy framework removes the opportunity to direct development, and could result in parking sites in unsuitable

		criteria that discourages development which would result in an adverse impact on biodiversity could result in a neutral effect. Effects are also uncertain until criteria are known.		which did not impact upon biodiversity, then this option could avoid an adverse effect and have a neutral effect. Effects are also uncertain until sites are known.		locations, including those which have adverse impacts on biodiversity of sites of ecological value. Effects are also uncertain and would depend on the site coming forward.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/0?	Sites for parking could have an adverse impact on open space, depending on their location. The inclusion of criteria that discourages development which would result in loss of open space could result in a neutral effect. Effects are also uncertain until criteria are known.	-/0?	Sites for parking could all have an adverse effect on open space depending on where they are located. If this option identified sites which did not result in loss of open space, then this option could avoid an adverse effect and have a neutral effect. Effects are also uncertain until sites are known.	-?	Lack of policy framework removes the opportunity to direct development, and could result in parking sites in unsuitable locations, including those which have adverse impacts on open space provision. Effects are also uncertain and would depend on the site coming forward.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/+?	Sites for parking could have an adverse impact on the SDNP and/or its setting depending on their location. The inclusion of criteria that discourages development which would result in an adverse impact on the SDNP could result in a neutral effect. If criteria encouraged development to improve links to the SDNP impacts could be positive. Effects are also uncertain until criteria are known.	-/+?	Sites for parking could all have an adverse effect on the SDNP and its setting. If this option identified sites which did not result in harm to the SDNP/setting, then this option could avoid an adverse effect and have a neutral effect. If this option identified sites which improved access to the SDNP, then impacts could be positive. Effects are also uncertain until sites are known.	-?	Lack of policy framework removes the opportunity to direct development and could result in parking sites in unsuitable locations, including those which have adverse impacts on SDNP/its setting. Effects are also uncertain and would depend on the site coming forward.
4. To protect and conserve the city's	-/0?	Sites for parking could all have an adverse effect on heritage assets	-/0?	Sites for parking could all have an adverse effect on heritage	-?	Lack of policy framework removes the opportunity to direct

historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites		depending on where they are located. The inclusion of criteria that discourages development within heritage assets or their settings could result in a neutral effect. Effects are also uncertain until criteria are known.		assets depending on where they are located. If this option identified sites which did not adversely impact upon heritage assets, then this option could avoid an adverse effect and have a neutral effect. Effects are also uncertain until sites are known.		development and could result in parking sites in unsuitable locations, including those which potentially have adverse impacts on heritage assets. Effects are also uncertain and would depend on the site coming forward.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+?	This option is considered to encourage delivery of park and ride and other parking provision. Evidence shows that there can be benefits from park and ride, including a reduction in city centre congestion, however that it may result in a displacement of issues and no overall reduction in travel by car. The potential city centre benefits of park and ride in terms of reduced congestion will only occur if the freed up road space/parking spaces are not taken by newly generated trips. Unless park and ride is associated with a reduction in city centre parking, then an overall increase in journeys by car may occur through freed up capacity on city centre roads. Improved coach parking may increase the ability to travel by coach, which is a more sustainable	-/+?	Site allocations are considered to encourage delivery of park and ride and parking provision. Results the same as option 1.	-?	Lack of policy framework removes the opportunity to direct development and could result in parking sites coming forward in unsuitable locations. It would also remove the opportunity to have a co-ordinated approach with other parking facilities in the city. However it could also result in no delivery of park and ride sites and result in little change. It could also result in certain types of parking facility not coming forward, e.g. coach parking that could promote more sustainable forms of transport.

		form of transport. Overall impacts are considered to be mixed and uncertain.				
6. To improve air and noise quality	-/+?	As described above, park and ride could result in improvements to city centre transport-based issues, such as reductions in traffic noise and improved air quality through reduced congestion, and this would have positive impacts for this objective, particularly as this is where the most significant air quality issues arise. However, it is noted that some of the worst case locations are currently not accessible by private car (e.g. North Street), therefore park and ride may not improve air quality in the worst locations. In addition, park and ride can also result in a displacement of traffic and result in air/noise issues around sites. Freed up capacity in the city centre may also be taken up by new trips in the long term, which may negate any short term air quality improvements. Criteria could include requirements to ensure development is not situated in locations where air and noise quality is currently an issue. Overall impacts are considered to be mixed and uncertain.	-/+?	As described under option 1, park and ride could help to improve city centre air and noise quality, particularly in the short term, however may lead to a displacement of issues to around the sites as well as new trips in the long-term. It may also not lead to significant improvements in air quality in the worst case locations. The impacts of park and ride on air/noise quality around the site are uncertain and would be dependent on a number of factors including the site location, access and whether there are existing local air/noise quality issues. Site allocations could result in positive localised effect if site selection considered these issues. Overall impacts are mixed and uncertain.	-?	Lack of policy framework removes the opportunity to direct development and could result in parking sites coming forward in less suitable locations, which either already have existing air/noise issues, or could lead to adverse impacts on air and noise quality. It could also result in park and ride sites not being delivered having little change.
7. To improve water	-/+?	The impacts of parking sites on	-/+?	As described under option 1,	-?	Lack of a policy approach removes

quality (ecological, chemical and quantity status)		improving water quality depend on the site developed. Positive results could be gained if the criteria encouraged sites to be developed which resulted in the remediation of contaminated land. However park and ride could result in increased surface water flooding/run-off, potentially impacting on water quality, if the development of the site involved change from a natural to a more urbanised form. Criteria could prioritise sites that are on brownfield sites to maximise beneficial effects.		parking sites could have either a positive or an adverse effect on water quality, depending on the location and previous/current use of the site. Impacts could be positive if the site selection process prioritised brownfield sites or those of an urbanised form, or sites with known contamination issues. The allocation of greenfield sites would result in adverse effects.		the opportunity to direct development and could result in sites coming forward in unsuitable locations, potentially having adverse impacts on this objective.
8. To reduce the risk from all sources of flooding to and from development	-/+?	The impacts of parking sites on flood risk depend on the site developed. Positive results could be gained if the criteria encouraged sites to be developed which were away from areas of high flood risk, and if sites incorporated SUDS. However parking sites could result in increased surface water flooding/run-off, if the site developed involved change from a natural to a more urbanised form. Criteria should require sites to be of low flood risk, and should prioritise brownfield sites in order to maximise beneficial impacts for this objective. However it is recognised	-/+?	As described under option 1, parking sites could have either a positive or an adverse effect on flood risk, depending on the location and previous/current use of the site. Impacts could be positive if the site selection process prioritised brownfield sites or those of an urbanised form. The allocation of greenfield sites would result in adverse effects for this objective as could increase the risk of flood risk. As with option 1, parking is not a vulnerable use, and it therefore may be a good use	-?	Lack of a policy approach removes the opportunity to direct development and could result in sites coming forward in unsuitable locations, potentially having adverse impacts on this objective.

		that parking is not considered to be a vulnerable use, and therefore it may be a better use of the land available to use a higher flood risk area as provision for parking.		of land available to make use of areas of higher flood risk as provision for parking.		
9. To reduce emissions of greenhouse gases that cause climate change	-	Impacts are adverse. Park and ride does not encourage travel by sustainable means and may encourage travel by car, contributing to transport based carbon emissions.	-	Impacts considered to be the same as option 1.	-	Impacts the same as option 1.
10. To increase the city's resilience and ability to adapt to climate change	-/+?	See objective 8	-/+?	See objective 8	-?	See objective 8
11. To improve soil quality	+/0?	The impacts of parking sites on improving soil quality depends on the site developed. Positive results could be gained if the criteria encouraged sites to be developed which resulted in the remediation of contaminated land, otherwise it would result in a neutral effect. Criteria could prioritise sites that are brownfield.	+/0?	Impacts could be positive if the site selection process prioritised brownfield sites or those with known contamination issues. Otherwise a neutral effect would be achieved.	0	Not having a policy removes the opportunity to direct development and is considered to have a neutral impact on this objective.
13. To make the best use of land available	+	This option is considered to be flexible and would still allow other uses on sites according to what the market decides to bring forward, but set clear criteria for where parking development comes forward.	-	This option is considered to be fairly inflexible and may result in sites being left vacant if development does not come forward. This could be a poor use of land given the significant development needs of the city.	-?	Parking sites may still come forward with this option. A lack of criteria or sites identified may result in development of land that would be better suited for alternative uses, and may therefore not be making the best use of land available.



<p>15. To improve the range, quality and accessibility of services and facilities.</p>	<p>+?</p>	<p>Although park and ride is unlikely to impact on the ability to access local services for local communities, it will enable sustainable access to a wider range of facilities, particularly for communities living in close proximity to the park and ride site who may be able to make use of its service. A criteria based policy could strengthen the positive result through the encouragement of development that would also facilitate access by local communities, as well as meeting needs of visitors/tourists.</p>	<p>+?</p>	<p>As with option 1, this option could help to improve access to services and facilities provided in the city centre and could benefit local communities living in the vicinity of the site as well as visitors, depending on the location of the site. Site selection process could include an assessment of whether the site would benefit local communities in terms of increasing access.</p>	<p>0?</p>	<p>Not having a policy approach removes the opportunity to direct development may result in development in less suitable locations. The opportunity to gain a positive impact for local communities through improving access could be lost.</p>
<p>16. To improve health and well-being, and reduce inequalities in health</p>	<p>-/+?</p>	<p>Park and ride could lead to improvements in air quality in the city centre, as well as other locations within the AQMA, where poor air quality poses a risk to health. It could however displace certain issues, and lead to a worsening of air quality around the sites themselves, impacting on residential health and amenity in the vicinity of the site. In addition, some of the worst case locations are currently not accessible by private car (e.g. North Street), therefore park and ride may not improve air quality in the worst case locations. Park and ride could also lead to an increase in journeys</p>	<p>-/+?</p>	<p>Impacts considered to be the same as option 1. Site selection process should include consideration of residential amenity in the vicinity of the site, in order to maximise positive gains.</p>	<p>-?</p>	<p>There could be little change with this option with no sites for parking delivery, or sites could come forward in locations without guidance to direct development. Opportunities to improve air quality and therefore health in city centre locations could be missed if park and ride is not delivered, however as described under option 1, park and ride may not result in significant improvements to air quality in the worst case locations. However, the lack of policy removes the opportunity to consider and highlight the importance of residential amenity.</p>

		made by car in the long term, as freed up capacity is taken up by new journeys. Criteria could include the requirement to protect residential amenity within the vicinity of the site.				
17. To improve community safety, and reduce crime and fear of crime	+	If this option resulted in a reduction in congestion, there could be associated improvements in road safety.	+	Impacts the same as option 1.	+	Impacts considered to be the same as option 1.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	A good transport system is integral to supporting economic growth, and congestion can have an adverse impact on economic development. A criteria based policy is considered to have a positive impact on this objective through increasing opportunities to access the city and potential improvements to traffic flow that will result from park and ride and specialist parking provision. This option is also considered to be flexible and allow the market to decide where sites should be located.	+	Impacts considered to be the same as option 1, however is considered to be less flexible and may result in vacant sites if development does not come forward.	+	Parking sites may still come forward with this option having beneficial impacts for this objective.

## Summary

### Option 1 – criteria policy

- This option had potential for mixed (adverse/neutral) impacts on biodiversity, open space and heritage assets. Impacts could be adverse as could result in loss or damage to biodiversity, loss of open space, and damage to heritage assets, however could be neutral if the policy criteria included consideration of these issues.
- This option had potential for mixed (adverse/positive) impacts on the SDNP, as could result in damage to the setting of the SDNP, however could be positive if criteria encouraged improving access to the SDNP.
- This option had potential for mixed (adverse/positive) impacts on reducing the need to travel. Although may improve congestion in some locations, impacts could be displaced. Park and ride does not necessarily lead to a reduction in journeys made by car, and may increase car journeys due to freed-up road and parking space in the city centre unless there is an equivalent reduction in city centre car park space. Criteria should ensure good access to the SRN in order to maximise vehicle interception.
- The option also had potential for mixed (adverse/positive) impacts on air/noise quality and health. As above, congestion in the city centre may improve having air quality benefits, however impacts may become displaced resulting in air quality and residential amenity impacts elsewhere. Also, air quality may not improve in the worst case locations (e.g. North Street) due to the predominant type of vehicles in these locations. Criteria should ensure consideration of any existing air quality issues round the site and residential amenity.
- This option had potential for mixed (adverse/positive) impacts on water quality, flood risk and climate change adaptation. Impacts could be adverse as sites for parking may result in an increase in impermeable surfacing, increasing flood risk. Impacts could be positive if criteria encouraged remediation of contaminated land, required SUDS and directed development to areas of lowest flood risk.
- This option had potential for adverse impacts on climate change mitigation, as is unlikely to result in a reduction of transport-based carbon emission and could result in an increase.
- This option had potential for positive impacts on making the best use of land available, as would provide a flexible approach allowing other uses to come forward if the market decides; improving access as could facilitate improved access for communities within the vicinity of park and ride sites; improving safety through the potential to reduce congestion; and significant positive effects on economic development through the links that good transport access has with economic growth and through the flexibility of this approach.

### Option 2 – site allocations

- This option had potential for similar mixed impacts as option 1 on the following objectives: biodiversity, open space, heritage assets, SDNP, water quality, flood risk and climate change adaptation. Positive effects could be gained if the site selection process considered and avoided these issues.
- This option had potential for similar mixed impacts as option 1 on the following objectives: reducing the need to travel, air/noise quality, health. Greater potential for positive effect could be gained if the site selection process considered access to the SRN, existing air quality issues and residential amenity.
- This option had potential for similar adverse impacts as option 1 on climate change mitigation.

- This option had potential for similar positive impacts as option 1 on improving access and improving safety.
- This option had potential for adverse impacts on making the best use of land available as the inflexibility with the site allocations approach may lead to land being left vacant and may not provide the opportunity to respond to a changing market.
- This option had potential for positive impacts on economic development, as would potentially help to improve congestion benefiting the economy, however was not as significantly positive as option 1, due to the lack of flexibility with this approach in terms of responding to changing markets.

### **Option 3 – no policy**

- This option had potential for adverse impacts on biodiversity, open space, SDNP, heritage assets, reducing the need to travel, air/noise quality, water quality, flood risk, climate change mitigation and adaptation, making the best use of land and health. Although some of these issues would be addressed by other adopted policy, the lack of policy for this topic removes the opportunity to guide development and direct development to the most suitable locations, and removes the opportunity to maximise any positive gains.
- This option had potential for positive impacts on improving safety and economic development, through the potential to improve congestion.

### **Overall summary**

- With all options, the potential for some of the adverse impacts would be mitigated through implementation of other CPP1 and other policy requirements. However both options 1 and 2 provide greater opportunity to ensure potential issues are considered and impacts are mitigated, either through policy criteria or specific site allocations.
- Although options 1 and 2 could result in adverse impacts across many of the environmental objectives, both options also have potential to have neutral or positive impact depending on either the type of criteria included in the policy or the consideration of certain issues at site selection stage. Option 3 is considered to result in similar adverse impacts across the environmental objectives, however does not provide the direct opportunity to overcome these issues.
- Option 2 would result in more certainty over a number of issues once the sites were known. However, if option 1 included criteria to ensure consideration of issues and the requirement for a range of site specific issues to be addressed, then option 1 should result in similar outcomes as the site allocation approach. Option 1 is considered to offer greater flexibility and ability to respond to changing markets than option 2. Option 1 has greater potential to make the best use of land and reduces the risk of allocated sites being left vacant if the market does not bring forward a scheme for that site, having greater economic benefits.

**CPP2 Options Appraisal: DM35 Travel Plans**

**Options:**

1. No additional policy – rely on CPP1 Policy CP9 (para 2c: major development required to submit a TA and implement agreed Travel Plans)
2. Policy regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans
3. Guidance (e.g. SPD) regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans

**Assumptions**

- Thresholds relate to e.g. size of development (floorspace/number of units).
- Whether or not a development requires a Transport Assessment, Transport Statement and/or Travel Plan is likely to depend on the size of development
- NPPF states “all development that generates a significant amount of movement should be supported by a TA/TS” and “should provide a Travel Plan”. There is no definition of what constitutes a “significant amount”.
- NPPG describes: TA as a thorough assessment of the transport implications of development; TS as a lighter-touch evaluation which may be more proportionate for developments with limited transport impacts; TP as a long-term management strategy for implementing sustainable travel measures

**Appraisal**

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	The city suffers from transport issues including congestion particularly at peak and holiday times. NPPF requires development that generates significant movement to be supported by a TA/TS. CPP1 CP9 para 2c requires all major development to submit a TA which identifies likely effects created by travel demand and set out measures to mitigate impacts, and to produce and implement a Travel Plan. No further details on what the	++	This option is considered to have more potential for significant positive impact on this objective. Specific policy requirements regarding when a TA, TS and/or Travel Plan is required, and their content, should bring about greater certainty and clarity for applicants and decision-makers and could allow more detail on the local issues to be considered. Policy should result in more robust TA/TS/TP	+	Effects considered to be the same as option 1. An SPD can provide additional detailed guidance on a subject and will be a material consideration. However it cannot establish new policy and is therefore likely to result in an effect the same as option 1, which relies on NPPF and CPP1 CP9 only.

		<p>Transport Assessment or Travel Plan should include is contained within the policy or supporting text. This option is considered to have a positive impact on this objective as will result in TA/TS/TP being submitted for certain types of development and this should help to reduce travel by car and encourage sustainable transport having citywide benefits in terms of contributing towards reducing congestion and other transport based issues.</p>		<p>and should help to bring about measures which improve travel choice, help to reduce car use, and have citywide benefits in terms of contributing towards reducing congestion and other transport based issues. It may also help to bring forward acceptable development on transport terms.</p>		
6. To improve air and noise quality	+	<p>Air and noise pollution are issues in certain parts of the city with the AQMA covering certain areas. Both forms of pollution are transport-based. Diesel, older and heavier vehicles are the key contributors to poor air quality in the city, combined with narrow streetscape. This option should have a positive impact on this objective through the requirement for major developments to submit a TA and implement a Travel Plan, however opportunities for smaller developments within the AQMA to tackle transport issues may be missed. However, requirements for major developments should result in less</p>	++	<p>This option is considered to have more potential for significant positive on this objective. Specific policy requirements regarding when a TA, TS and/or Travel Plan is required, and their content, should bring about greater certainty and clarity for applicants and decision-makers and could allow more detail on the local issues to be considered including air and noise quality, e.g. different requirements within the AQMA. Policy should result in more robust TA/TS/TP and should help to bring about measures which reduce travel</p>	+	<p>Effects considered to be the same as option 1. An SPD can provide additional detailed guidance on a subject, which will be a material consideration, however it cannot establish new policy and is therefore likely to result in an effect the same as option 1, which relies on NPPF and CPP1 CP9 only.</p>

		<p>journeys being made by car which would have associated benefits for air and noise quality. Despite buses being the main contributor to poor air quality in certain parts of city, less journeys being made by car and more via sustainable means is still considered to have an overall positive impact on air and noise quality.</p>		<p>by car and increase sustainable travel, directly impacting upon air and noise quality.</p>		
<p>9. To reduce emissions of greenhouse gases that cause climate change</p>	+	<p>Transport contributes to around a quarter of the total carbon emissions in the city. This option should have a positive impact on this objective through the requirement for major developments to submit a TA and implement a Travel Plan. This should result in less journeys being made by car which would help to minimise / reduce transport-based carbon emissions.</p>	++	<p>This option is considered to have more potential for significant positive on this objective. Specific policy requirements regarding when a TA, TS and/or Travel Plan is required, and their content, should bring about greater certainty and clarity for applicants and decision-makers. Policy should result in more robust TA/TS/TP and should help to bring about measures which reduce travel by car, and increase sustainable travel which produces less carbon emissions.</p>	+	<p>Effects considered to be the same as option 1. An SPD can provide additional detailed guidance on a subject, which will be a material consideration, however it cannot establish new policy and is therefore likely to result in an effect the same as option 1, which relies on NPPF and CPP1 CP9 only.</p>
<p>13. To make the best use of land available</p>	+	<p>Implementation of travel plans can reduce the amount of land required for parking provision. This could make more land available for other uses and would be a better use of</p>	+	<p>Impacts considered to be the same as option 1. Implementation of travel plans can reduce the amount of land required for parking provision</p>	+	<p>Impacts considered to be the same as options 1 and 2.</p>

		land given the constrained nature of the city and competing land requirements.		which would have a positive effect on this objective. It is considered unlikely that a detailed policy approach would result in different effect than option 1 for this objective.		
15. To improve the range, quality and accessibility of services and facilities.	+	This option should have a positive impact on this objective depending on the use of the development. E.g. TA/Travel Plans could be submitted as part of a leisure, retail, health, education or employment development which would help to facilitate access to these services.	++	This option is considered to have more potential for significant positive on this objective. Specific policy requirements regarding when a TA, TS and/or Travel Plan is required, and their content, should bring about greater certainty and clarity for applicants and decision-makers. Policy should result in more robust TA/TS/TP and should help to bring about measures which improve travel choice and accessibility.	+	Effects considered to be the same as option 1. An SPD can provide additional detailed guidance on a subject, which will be a material consideration, however it cannot establish new policy and is therefore likely to result in an effect the same as option 1, which relies on NPPF and CPP1 CP9 only.
16. To improve health and well-being, and reduce inequalities in health	+	This option should have a positive impact on this objective through the requirement for major developments to submit a TA and implement a Travel Plan. This could result in more active forms of travel having health benefits, including helping to address health inequalities associated with inactivity. In addition, there will be health benefits resulting from improvements to air and noise	++	This option is considered to have more potential for significant positive impact on this objective. Specific policy requirements regarding when a TA, TS and/or Travel Plan is required, and their content, should bring about greater certainty and clarity for applicants and decision-makers and could allow more detail on the local issues to be	+	Effects considered to be the same as option 1. An SPD can provide additional detailed guidance on a subject, which will be a material consideration, however it cannot establish new policy and is therefore likely to result in an effect the same as option 1, which relies on NPPF and CPP1 CP9 only.



		quality.		considered. Policy should result in more robust TA/TS/TP and should help to bring about measures which improve travel choice, help to reduce car use, and promote active forms of transport, having health benefits. In addition, any associated improvements in air and noise quality would also benefit health.		
17. To improve community safety, and reduce crime and fear of crime	+	This option should have an indirect positive impact on this objective through the requirement for major developments to submit a TA and implement a Travel Plan. As congestion and the amount of vehicles on the road are directly related to road safety, any reduction in journeys being made by car would have safety benefits.	+	Effects the same as option 1. Implementation of travel plans should help to reduce congestion which has associated benefits in terms of road safety. It is considered unlikely that a detailed policy approach would result in different effect than option 1.	+	Effects the same as options 1 and 2.
18. To increase equality and social inclusion	+?	Lack of transport options and access to services can result in social exclusion. This option could have an indirect positive effect on this objective through the potential to increase opportunities for travel that is accessible to all. However this is uncertain as will depend on take up by communities.	+?	Effects the same as option 1. It is considered unlikely that a detailed policy approach would result in different effect than option 1.	+?	Effects the same as options 1 and 2.
19. To contribute towards the growth	+	Congestion has a direct impact on the economy. This option could lead	++	This option is considered to have more potential for		Effects the same as option 1.

<p>of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>		<p>to reduced congestion through implementation of travel plans and therefore is considered to have a positive effect on this objective.</p>		<p>significant positive on this objective. Specific policy requirements regarding when a TA, TS and/or Travel Plan is required, and their content, should result in more robust TA/TS/TP. This should help to bring about measures which contribute towards reducing congestion and other transport based issues and this will have positive benefits for economic development.</p> <p>In addition, this option should provide greater clarity to applicants and decision makers and may help bring development forward, also having economic benefits.</p>		
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**Summary**

**Option 1 – no policy**

- As with options 2 and 3, this option had potential for positive impacts on making the best use of land, as Travel Plans can help to reduce land-take required by developments for parking; improving safety, due to the link between reduced car use and improved road safety; and increasing social inclusion due to the potential availability of more accessible forms of transport which could contribute towards preventing transport-based social exclusion.
- This option also had potential for positive impacts on all objectives that have links with transport including: reducing car use, improving air/noise quality, reducing carbon emissions, improving access and improving health. It also had potential for supporting economic development, with improvements in congestion and traffic flow directly impacting on the economy. However the positive impact for these objectives was not considered to be as strong as option 2.

**Option 2 – policy**

- As with option 1, this option had potential for positive impacts on making the best use of land, improving safety and increasing social inclusion.
- This option had more potential for significant positive impact across a number of transport-based objectives when compared with options 1 and 3. A more detailed policy approach should bring about greater certainty and clarity for applicants and decision-makers, should enable greater consideration of local issues and should result in more robust TA/TS/TP. This should result in greater potential to reduce car use, improve noise/air quality, reduce carbon emissions, improve access, improve health and support economic development. It may also help to bring development forward having additional economic benefits.

### Option 3 – SPD/guidance

- Impacts the same as option 1.

### Preferred option

- All options should have positive impacts, however option 2 has more potential for significant positive impact on a number of objectives when compared to options 1 and 3. This includes the key objectives for this topic area of transport, air quality and greenhouse gas emissions, as well as access, health and economic development.
- Option 2 is considered to be the preferred approach.

### CPP2 Options Appraisal: DM36 Parking & Servicing

#### Options:

Option 1) No additional policy – rely on CPP1 Policy CP9 and guidance in the Parking Standards SPD

Option 2) Policy regarding the parking and servicing arrangements required to support new development (with standards from SPD set out in an Appendix)

#### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
5. To reduce the need to travel by car, encourage travel by	+	The city suffers from transport issues including congestion particularly at peak and holiday times. CP9.6 states that new guidance for parking and servicing	++	This option is considered to have more potential for significant positive impacts on this objective. Although the standards set out in SPD14 will not change with this

sustainable forms of transport and improve travel choice		<p>will be prepared as guidance. SPD14 Parking Standards sets out maximum car parking standards for all uses which vary according to whether the site is located within central areas, on key public transport corridors, or in outlying areas. Lower amounts of parking are permitted in central areas where public transport is easily accessible compared to outer areas where a greater amount is permitted where public transport is less accessible. The SPD also provides guidance for car free housing, and sets minimum standards for cycle parking, disabled parking, motorcycle parking and servicing.</p> <p>This option is therefore considered to have a positive impact on this objective. The SPD seeks to influence car ownership and travel choice through reduced car parking availability and promotes sustainable travel, through minimum cycle parking standards.</p>		<p>option, the inclusion of the standards in the policy gives them greater weight. Policy could therefore help to influence car ownership and travel choice, should lead to increased sustainable travel infrastructure, and promotes low-carbon forms of transport.</p>
6. To improve air and noise quality	+	<p>Air and noise pollution are issues in certain parts of the city with the AQMA covering certain areas. Both forms of pollution are transport-based. Diesel, older and heavier vehicles are the key contributors to poor air quality in the city, combined with narrow streetscape, however cars also contribute to poor air quality.</p> <p>The AQMA is located within the “central areas” and “key public transport corridors” zones of the SPD which permit a lower amount of car parking than the outer areas. Any reduction in congestion or car journeys made within these two areas would therefore be beneficial for air quality.</p> <p>This option should therefore have a positive impact on this objective.</p>	++	<p>This option is considered to have more potential for significant positive on this objective as the inclusion of standards within the policy will give them greater weight and may therefore have greater influence on car ownership and travel choice, and therefore air quality.</p>
9. To reduce emissions of greenhouse gases	+	<p>Transport contributes to around a quarter of the total carbon emissions in the city. This option should have a</p>	++	<p>This option is considered to have more potential for significant positive on this objective as the inclusion of</p>

that cause climate change		positive impact on this objective through the potential to influence car ownership and travel choice. This could result in less journeys being made by car which would help to minimise / reduce transport-based carbon emissions.		standards within the policy will give them greater weight and may therefore have greater influence on car ownership and travel choice, and therefore contribute towards minimising transport-based carbon emissions.
13. To make the best use of land available	+	Implementation of maximum car parking standards should help to minimise land-take required for parking provision. This could make more land available for other uses and would be a better use of land given the constrained nature of the city and competing land requirements.	++	This option is considered to have more potential for significant positive on this objective as the inclusion of standards within the policy will give them greater weight.
15. To improve the range, quality and accessibility of services and facilities.	+	The SPD sets out car parking standards for various uses, including e.g. Health, with 1 space per consulting room in central and transport corridor zones is permitted, and 2 spaces per consulting room in outer area zone is permitted. It also sets standards for other uses such as hospitals, where people may need to travel by car due to health reasons, and other uses, including e.g. retail and leisure. The availability of a certain amount of parking, should ensure that access is maintained for those who need or wish to drive. In addition, minimum cycle parking for all forms of development could help increase access for those who cycle and minimum disabled parking requirements should ensure adequate parking provision for disabled people.	++	This option is considered to have more potential for significant positive on this objective as the inclusion of standards within the policy will give them greater weight. This option should ensure that access to services is provided.
16. To improve health and well-being, and reduce inequalities in health	+	Air pollutants may be minimised due to the potential for this option to influence car ownership and travel choice. The availability of cycle parking may influence people to travel by bike, having benefits for physical health. This option should therefore have a positive impact on this objective.	++	This option is considered to have more potential for significant positive on this objective as the inclusion of standards within the policy will give them greater weight. Implementation of the standards may have various benefits for health through potential improvements to air quality and through facilitating opportunities for active travel.
17. To improve	+	This option could influence car ownership and travel	++	This option is considered to have more potential for

community safety, and reduce crime and fear of crime		choice and ultimately reduce congestion. As congestion and the amount of vehicles on the road are directly related to road safety, any reduction in journeys being made by car would have road safety benefits		significant positive on this objective as the inclusion of standards within the policy will give them greater weight.
18. To increase equality and social inclusion	+	The SPD clearly sets out the minimum amount of disabled parking required to be provided for different types of development. This should ensure the travel needs, relating to travel by car, of disabled people are met.	++	This option is considered to have more potential for significant positive on this objective as the inclusion of standards within the policy will give them greater weight.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	Congestion has a direct impact on the economy. This option could lead to reduced congestion through the potential for maximum car-parking standards to influence travel choice, having a positive effect on this objective. The SPD still allows some car-parking for uses, including those which are strongly linked to the local economy, e.g. B1 and A1, therefore supporting access to these uses which form an important part of the economy.	++	This option is considered to have more potential for significant positive impact on this objective as the inclusion of standards within the policy will give them greater weight.

### Summary

#### Option 1 – no policy – SPD only

- This option had potential for positive impacts on all objectives that have direct links with transport including: reducing car use, improving air/noise quality, reducing carbon emissions, improving access, improving safety and improving health.
- It also had potential for supporting economic development, with improvements in congestion and traffic flow directly impacting on the economy; on making the best use of land, through the potential to minimise land-take required for parking; and equalities through disabled parking requirements.

#### Option 2 – policy with standards as an appendix

- This option also had potential to have positive impacts on all the objectives all objectives that have direct links with transport including: reducing car use, improving air/noise quality, reducing carbon emissions, improving access, improving safety and improving health. Positive impacts were considered to be more significantly positive as this option carries greater weight.

#### Preferred option

- Both options should have positive impacts, however option 2 has more potential for significant positive impacts against relevant objectives including reducing car use, improving air/noise quality, reducing carbon emissions, improving access, improving safety, improving health, economic development and making the best use of land, as the standards have greater weight when included within policy.
- Option 2 is considered to be the preferred approach.

## Environment and Energy

### CPP2 Options Appraisal: DM37 Green Infrastructure & Nature Conservation

#### Options

- Option 1) No policy framework in CPP2 to address and protect Green Infrastructure and nature conservation but rely on NPPF and high level policy CP10 Biodiversity, CP16 Open Space, CP17 Sports Provision and detailed SPD (SPD11 and SPD06).
- Option 2) One criteria based policy addressing the different nature conservation designations, species protection and Green Infrastructure
- Option 3) Have a number of policies in CPP2 so that there is one for each of the different designations, one for species protection and also one for Green Infrastructure

#### Appraisal

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	NPPF and CPP1 set overarching strategic approach to enhancing and conserving biodiversity and safeguarding and improving open space. However, these do not provide detail against which development proposals will be judged e.g. on the hierarchy of nature conservation sites, nor does CPP1 have any direct reference to Green Infrastructure. Impacts likely to be positive, but not significant and may result in opportunities to fully address impacts of development on sites of nature conservation importance being missed, as well as missing the opportunity to refer to other areas of value which are not designated, e.g. ancient woodland.	++	This option would result in one policy that addressed various cross-cutting issues of designated sites, species protection and green infrastructure. It should provide clear criteria to assess the impacts of development on all of these issues and help to ensure that biodiversity, including protecting species and designated sites, as well as green infrastructure is a consideration in the planning application process and should ultimately lead to its protection. Overall impacts are likely to be significantly positive. There is a risk that this option may result in a length policy that affects its usability and therefore if this approach is pursued, it may be	++	This option would result in several separate policies that contain specific criteria and considerations that are applicable to each of the relevant areas, e.g. species, green infrastructure and nature conservation designations. This option should result in a significant positive impacts on this key objective as should help to protect and enhance certain species and designated sites, may help to recognise the importance of linear features for biodiversity connectivity and may help to improve links between existing or new areas of biodiversity/green infrastructure. It would also provide greater clarity to applicants, although may result in some repetition between areas that have a natural overlap.



				preferable to ensure the different topic areas are separated where possible. However it would help to reduce repetition and overlap.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	CPP1 CP16 and CP17 sets the approach to safeguarding and protecting open space and sets out open space quantity and accessibility standards across a range of typologies. Impacts should be positive.	++	This option would result in one policy that addressed various cross-cutting issues of designated sites, species and green infrastructure. Most designated sites are located within open spaces of a certain typology, e.g. natural/semi-natural, and this would therefore have a positive impact on this objective through indirectly protecting these open spaces. In addition, this option would enable references to green infrastructure to be included within policy, which is currently lacking in CPP1. As described under objective 1 there is a risk that this option may result in a lengthy policy that affects its usability and therefore if this approach is pursued, it may be preferable to ensure the different topic areas are separated where possible. However it would help to reduce repetition and overlap.	++	This option would result in several separate policies that contain specific criteria and considerations that are applicable to each of the relevant areas, e.g. species, green infrastructure and nature conservation designations. This option should result in significant positive impacts on this objective as should help to protect and enhance open space and green infrastructure through the various policies e.g. by the protection of designated sites which may be located within open spaces. As described under objective 1 this option may result in some repetition between areas that have a natural overlap.
6. To improve air and noise quality	+	CPP1 CP10, CP16 and CP17 sets the approach to safeguarding and	+	See option 1.	+	See option 1.

		protecting biodiversity and these assets should therefore be protected under this option. Open spaces and biodiversity can all help to maintain or improve air quality and can help with noise management. Impacts are therefore positive and considered to be indirect.				
8. To reduce the risk from all sources of flooding to and from development	+	CPP1 CP10, CP16 and CP17 sets the approach to safeguarding and protecting biodiversity and open space and these assets should be protected under this option. Open spaces, biodiversity and green infrastructure can all help to reduce flood risk through the role they play in absorbing water. Impacts are therefore positive and considered to be indirect.	+	See option 1.	+	See option 1
10. To increase the city's resilience and ability to adapt to climate change	+	CPP1 CP10, CP16 and CP17 sets the approach to safeguarding and protecting biodiversity and open space and these assets should be protected under this option. Open spaces, biodiversity and green infrastructure can all help the city adapt to climate change as they can help to reduce flood risk through the role they play in absorbing water and can also help to maintain temperatures. Impacts are therefore positive and considered to be indirect.	+	See option 1.	+	See option 1

Summary	All options could have an indirect positive impact on this objective, as sites of a natural form, as well as other types of green infrastructure, such as trees, can help to reduce flood risk through natural absorption of water and can help to maintain urban temperatures, therefore helping the city to adapt to climate change.					
16. To improve health and well-being, and reduce inequalities in health	+	Access to the natural environment has documented benefits for both physical and mental health. CPP1 CP10, CP16 and CP17 sets the approach to safeguarding and protecting biodiversity and open space and should result in protection of these assets under this option. This option should therefore have an indirect positive impact on this objective.	+	See option 1.	+	See option 1.

### Summary

#### Option 1 – no policy

- This option has potential for positive impacts for a number of objectives including: biodiversity, through the strategic level of protection provided for biodiversity by this approach; open space, through the indirect protection of open spaces, particularly natural/semi-natural that may occur through the protection of certain sites; air & noise quality, through the role that the natural environment plays in maintaining and potentially improving air and noise quality; flood risk and climate change adaptation through the role the natural environment plays in absorbing water and maintaining urban temperatures; and health, through the link between access to the natural environment and good physical health and mental well-being.
- Although impacts are considered to be positive, none are considered to be significantly positive and this option may result in opportunities to fully address impacts of development on sites of nature conservation importance being missed, as well as missing the opportunity to refer to other areas of nature conservation value which are not designated, such as ancient woodland. This option will miss the opportunity to refer to “green infrastructure” which is not referred to in CPP1.

#### Option 2 – combined policy

- As with option 1, this option has potential for positive impacts for a number of objectives including air & noise quality, through the role that the natural environment plays in maintaining and potentially improving air and noise quality; flood risk and climate change adaptation through the role the natural environment plays in absorbing water and maintaining urban temperatures; and health, through the link between access to the natural environment and good physical health and mental well-being.

- This option has greater potential for significant positive impact on the objectives for biodiversity (1) and open space (2). This option should provide clear criteria to assess the impacts of development on designated sites and species, and should help to ensure that biodiversity as well as green infrastructure is a consideration in the planning application process and should ultimately lead to its protection and/or greater consideration. In addition, this option would enable references to green infrastructure to be included within policy, which is currently lacking in CPP1.
- There is a risk that this option may result in a lengthy policy that affects its usability and therefore if this approach is pursued, it may be preferable to ensure the different topic areas are separated where possible.

### Option 3 – separate policies

- Impacts considered to be the same as option 2.
- This option may provide greater clarity to applicants than option 2, although may result in some repetition between areas that have a natural overlap.

### Preferred Option

- All options have potential for positive impacts across related objectives. However options 2 and 3 have greater potential for more significant positive impacts on the key objectives for this topic area, which are the objectives for biodiversity and open space due to the greater detail provided with these approaches.

## CPP2 Options Appraisal: DM38 Local Green Space (LGS)

### Options Appraisal

- Option 1) No policy framework to designate Local Green Space (LGS) sites in the City Plan
- Option 2) Policy designating the four urban fringe sites; Hollingbury Park, Three Cornered Copse, Ladies’ Mile and Benfield Valley; which received significant support from respondents to the City Plan Part Two Scoping Paper.
- Option 3) Policy designating all the sites promoted by more than one individual in response to the City Plan Part Two Scoping Paper.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	All types of designated open space are safeguarded under CPP1 CP16 and CP17 and not having a policy on Local Green Space would not change	++	All of the 4 sites put forward as LGS in this option include areas of natural/semi-natural open space which are likely to be of benefit for	-/+	This option could result in mixed impacts. This option would provide greater protection for the LGS sites which in turn is likely to have benefits

		<p>this. This includes natural/semi-natural greenspace which particularly has benefits for biodiversity. This option would still result in positive impacts for this objective.</p>		<p>various types of biodiversity. This option would have more significant positive impacts for this objective as may provide greater clarity over areas of the LGS that may require greater protection, which could include for example, areas of greater ecological value.</p>		<p>for biodiversity, however may increase pressure on non-LGS sites which have a lower level of protection, particularly if a high number of sites are designated as LGS.</p>
<p>2. To protect and improve open space and green infrastructure and improve sustainable access to it</p>	+	<p>All types of designated open space are safeguarded equally under CPP1 CP16 and CP17 and not having a policy on Local Green Space would not change this. This option would still result in positive impacts for this objective.</p>	++	<p>This option would provide an added layer of protection for these 4 sites and could help to protect these open spaces to a greater degree that just CP16/CP17 alone. It may also lead to improvements in the open spaces with the designation. This option would also leave the majority of sites without this designation and therefore any developmental pressure on the other sites could be distributed. Impacts could be significantly positive.</p>	-/++	<p>This option could result in mixed impacts. This would provide greater protection and potentially improvements for the LGS sites potentially having significant impacts for this objective. However may increase pressure on non-LGS sites which have a lower level of protection, particularly if a high number of sites are designated as LGS.</p>
<p>3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it</p>	+	<p>Some of the open spaces in the city adjoin and provide links to the SDNP. Not designating any sites as LGS will not change their open space designation and the function that some provide in terms of links to the SDNP. Impacts likely to be positive.</p>	+	<p>All of the 4 sites are urban fringe sites and some directly adjoin and provide links to the SDNP e.g. Hollingbury Park and Benfield Valley. Designating them as LGS could provide the opportunity to strengthen the links with the SDNP although this would depend on implementation. Impacts likely to be positive and not considered to be any more significantly positive</p>	+	<p>Same as option 2. Some of the other sites may adjoin and provide links to the SDNP, however impacts resulting from designating numerous LGS are not considered to be any more significant than not designating them for this objective.</p>

				than not designating them in relation to this objective.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	Some open spaces are within or contain Conservation Areas or other heritage assets, and therefore provide the potential to have positive impacts for heritage, particularly where the open space forms part of the heritage designation.	+	Two of the four sites are either within or contain a Conservation Area (Benfield Valley and Three Cornered Copse). In addition, one is in the setting of a SM. Designating sites as LGS will further protect the open spaces, which may be an important contributor to the heritage designation, having positive impacts on this objective, however is unlikely to have a more significant positive impact that option 1.	+	Same as option 2. Some of the sites may form part of a heritage designation, however impacts for this objective not considered to be any more significant that not designating them.
8. To reduce the risk from all sources of flooding to and from development	+	All types of designated open space are safeguarded under CPP1 CP16 and CP17 and not having a policy on Local Green Space would not change this. Open space plays an important role in absorption of water and reduction of flood risk, which impacts positively on this objective.	+	Impacts considered to be the same as option 1. Having a policy designating 4 LGS is unlikely to have a greater positive impact on the role open spaces play in terms of absorption of water and reduction in flood risk.	+	Impacts considered to be the same as option 1. Having a policy designating a greater number of LGS is unlikely to have a greater positive impact on the role open spaces play in terms of absorption of water and reduction in flood risk.
10. To increase the city's resilience and ability to adapt to climate change	+	All types of designated open space are safeguarded under CPP1 CP16 and CP17 and not having a policy on Local Green Space would not change this. Open space plays an important role in absorption of water, reduction of flood risk and maintaining urban temperatures and therefore help the city adapt to	+	Impacts considered to be the same as option 1. Having a policy designating 4 LGS is unlikely to have a greater positive impact on the role open spaces play in terms of helping the city adapt to climate change.	+	Impacts considered to be the same as option 1. Having a policy designating a greater number of LGS is unlikely to have a greater positive impact on the role open spaces play in terms of helping the city adapt to climate change.

		climate change, which impacts positively on this objective.				
14. To provide housing, including affordable housing, to contribute towards meeting local needs	-	Although CP16/CP17 allows development of open space when allocated in a DPD, the policy's main objective is the safeguarding and improving of the city's open space resource. Although this option would not result in an any additional protection for open spaces, CP16/CP17 still apply and therefore are considered to have an adverse impact on this objective.	-	This option may prevent housing development from taking place on the designated sites. However, as only 4 sites are designated, the impact is not considered to be significantly different from option 1.	--	This option is considered to be more significantly adverse than other options, as may prevent housing development on a greater number of sites.
16. To improve health and well-being, and reduce inequalities in health	+	Access to open and green space contributes significantly towards physical health and well-being. All types of designated open spaces are safeguarded under CPP1 CP16 and CP17 and not having a policy on Local Green Space would not change this. Impacts considered to be positive.	+	This option would provide an additional layer of protection for the 4 sites, however this is not considered to impact any more significantly on this objective than option 1.	+	As option 2. Designating a number of sites as LGS is not considered to impact any more significantly on this objective than option 1.

### Summary

#### Option 1 – no policy. No LGS designations

- This option was found to have potential for positive impacts on the objective for biodiversity, open space, SDNP, heritage, flood risk, climate change adaptation, and health. With this option, all open space will be equally safeguarded under CPP1 CP16/CP17 and the various benefits arising from open space will occur, including ecological benefits, particularly where open space is natural/semi-natural; absorption of water, reducing flood risk and helping to maintain urban temperatures, helping to increase resilience to climate change; will contribute towards health; and depending on the location, may provide links to the SDNP and play a role in heritage designations, e.g. through forming part of the setting of a conservation area.
- This option was found to have potential for adverse impacts on the objective for housing. The protection of open space may prevent development of housing on these sites, although it is recognised that development is permitted if allocated in a DPD.

### **Option 2 – policy designating 4 sites as LGS**

- This option was found to have potential for significant positive impacts on the objectives for open space and biodiversity. The sites designated as LGS will have additional policy considerations over those set out in CP16/CP17 that should lead to a greater protection of these 4 sites, as well as potentially open space improvements, without significantly increasing the pressure on sites that are not a LGS, due to the amount designated. The sites designated as LGS all contain areas of natural/semi-natural open space and some contain ecological designations. The LGS designation may lead to greater protection of these areas of ecological value. In addition, those without an LGS designation with ecological value will still benefit through the protection provided through CP16/17.
- This option was found to have potential for positive impacts on the objectives for SDNP, heritage, flood risk, climate change adaptation, and health. All sites of open space will be safeguarded via CP16/CP17, including those that are designated a LGS, and this will have various benefits due to the wider environmental role of open space including absorption of water, reducing flood risk and helping to maintain urban temperatures, helping to increase resilience to climate change; will contribute towards health. Some of the LGS sites, as well as other open spaces, will provide links the SDNP, and some may play a role in heritage designations, e.g. through forming part of the setting of a conservation area.
- This option was found to have potential for adverse impacts on the objective for housing. The LGS designation may prevent development of housing on these sites, although it is recognised that development is permitted if allocated in a DPD.

### **Option 3 – policy designating numerous sites**

- This option was found to have potential for positive impacts on the objective for SDNP, heritage, flood risk, climate change adaptation, and health. All sites of open space will be safeguarded via CP16/CP17, including those that are designated a LGS, and this will have various benefits due to the wider environmental role of open space including absorption of water, reducing flood risk and helping to maintain urban temperatures, helping to increase resilience to climate change; will contribute towards health. Some of the LGS sites, as well as other open spaces, are likely to provide links to the SDNP, and some may play a role in heritage designations, e.g. through forming part of the setting of a conservation area.
- This option was found to have potential for mixed positive and negative impacts on the objectives for biodiversity and open space. A higher number of sites would have an additional level of protection with this option, having greater benefits for those sites in relation to the open space and biodiversity objectives. However this may unduly increase the development pressure on the remaining non-LGS designated sites and lead to greater losses on these sites.
- This option was found to have potential for significant adverse impacts on the objective for housing. Having a greater number of sites with a LGS designation may prevent development of these sites, although it is recognised that development is permitted if allocated in a DPD.

### **Preferred Option**

- Option 2 is the preferred approach. In particular this option should have a significant positive impact on the key objective for this topic area: open space. This option provides greater protection of open spaces designated as LGS and may lead to open space improvements on these sites, but also should not



significantly increasing the risk of development on a smaller number of open spaces without an LGS designation, due to the amount designated, as could be the case with option 3.

- Option 2 should also result in a significant positive impact for biodiversity, as the four sites all contain areas of ecological value, and the LGS designation may lead to greater ecological considerations. Other impacts are broadly similar to the other options and largely stem from the various benefits and environmental roles performed by open space.

### CPP2 Options Appraisal: DM39 Seafront Development

#### Options:

- Option 1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)
- Option 2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated
- Option 3) Develop further guidance on development within the seafront through a masterplan/ SPD

#### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	There are designated wildlife sites situated in seafront locations as well as a Marine Conservation Zone. One of the priorities of SA1 is to conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment. CP10 Biodiversity sets the strategic approach to enhancing nature conservation across the city, including the seafront. There is the risk that development	++	This option could provide the opportunity to have greater consideration of site specific biodiversity issues through site allocations. As with option 1, development could adversely affect biodiversity, however overall impacts have potential for being significantly positive, although this depends on the detail and requirements included in the policy.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, and could include greater consideration of biodiversity issues, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 – e.g. rely on CPP1.

		in any location could adversely affect biodiversity, however overall impacts should be positive with policy requirements providing mitigation.				
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	The openness and offer provided by the beach as a form of open space is recognised in SA1. It forms an important part of the network of open spaces in the city. It also includes some spaces for outdoor sports e.g. volleyball. SA1 and CP16 both recognise the importance of the open spaces of the beach and seafront, and also support sustainable access to this location. Impacts should be positive.	+	Site allocations may provide the opportunity to improve and bring forward underutilised sections of the seafront, and could therefore make better use of the space. Impacts likely to be positive.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 e.g. rely on CPP1.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	The SDNP extends down to the mean low water point in the area that is within the “East of the Marina” section of SA1. SA1 requires there to be no adverse impacts on the setting of the SDNP. Impacts should be positive.	0	It is considered unlikely that this option would include any site allocations that are situated within the section of the seafront within the SDNP, nor include further references to protecting/enhancing the SDNP as these are already addressed in existing CPP1 policy. No impacts anticipated.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 e.g rely on CPP1.
4. To protect and conserve the city’s historic built environment, heritage assets and	+	One of the priorities of SA1 is to promote high quality architecture and design which preserves and enhances the character and appearance of the Conservation	++	This option could provide the opportunity to include greater consideration of site specific heritage issues through site allocations.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new

<p>their settings, townscapes, buildings and archaeological sites</p>		<p>Areas and historic squares and buildings that adjoin the seafront. In addition, CP15 Heritage provides the strategic approach to conserving the historic environment. Impacts should be positive. Emerging CPP2 policies on heritage assets should also add to their protection, although the content of these is currently unknown.</p> <p>There is the risk that development in any location could adversely affect heritage assets, however overall impacts should be positive with policy requirements providing mitigation.</p>		<p>As with option 1, development could adversely affect heritage, however overall impacts have potential for being significantly positive, depending on the level of detail included in the policy regarding the historic environment.</p>		<p>policy and is therefore likely to result in an effect which is the same as Option 1 e.g rely on CPP1.</p>
<p>5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice</p>	<p>-/+</p>	<p>Traffic congestion is often an issue along the seafront. One of the overall priorities of SA1 is to improve sustainable transport infrastructure along the A259 and improve access to the seafront areas. Additional locational priorities referring to improving other forms of sustainable access, including the NCN route. CP9 sets the strategy in relation to sustainable transport.</p> <p>There is the risk that development along the seafront could further increase unsustainable journeys. Overall impacts are considered to</p>	<p>-/+</p>	<p>Site Allocations may provide greater certainty to developers and may help to bring forward development. This could result in further transport issues. However this option could include greater consideration of site specific transport issues through site allocations.</p> <p>This option could also provide the opportunity to include a reference to supporting development of the England Coastal Path which may help promote sustainable access</p>	<p>-/+</p>	<p>Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.</p>

		be mixed.		across the seafront. Overall impacts are considered to be mixed.		
6. To improve air and noise quality	-/+	The majority of the A259 west of the Palace Pier is within the AQMA. SA1 includes a priority to improve air and noise quality across the whole seafront. There is the risk that development along the seafront could further increase journeys made having air quality impacts. Overall impacts are considered to be mixed.	-/+	Site Allocations may provide greater certainty to developers and may help to bring forward development. This could result in further transport and air quality impacts. However this option could include greater consideration of site specific transport issues through site allocations, which may benefit air quality. Overall impacts are considered to be mixed.	-/+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
7. To improve water quality (ecological, chemical and quantity status)	+	SA1 includes a priority to ensure appropriate waste water treatment infrastructure. All development will be required to meet requirements of CP8 that sets certain standards for water consumption. Overall impacts should be positive.	0	It is considered unlikely that this option will provide any further detail with regards to water infrastructure as this is already provided at a strategic level by CPP1. No impacts anticipated,	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
8. To reduce the risk from all sources of flooding to and from development	+	SA1 recognises that the seafront is at risk of tidal flooding and includes a priority to maintain coastal defences. CP11 also requires development to take into account flood risk if relevant. Overall impacts should be positive.	++	This option, via site allocations may provide the opportunity for more site specific issues regarding flood risk to be addressed. Impacts could be significantly positive depending on site location and the level of detail included in	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.

				the policy.		
9. To reduce emissions of greenhouse gases that cause climate change	+	SA1 includes a priority to encourage opportunities for low/zero carbon energy provision. All development will be required to meet requirements of CP8 that sets certain standards for energy consumption. Overall impacts should be positive.	0	It is considered unlikely that this option will provide any further detail with regards to energy efficiency or energy infrastructure as this is already provided at a strategic level by CPP1. No impacts anticipated.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
10. To increase the city's resilience and ability to adapt to climate change	+	SA1 recognises that the seafront is at risk of tidal flooding and includes a priority to maintain coastal defences and this will help the city be more resilient to climate change. SA1 also includes a priority to improve opportunity for shelter and shade, as well as tree-planting, which will also help with climate change adaptation. Overall impacts should be positive.	++	This option, via site allocations, may provide the opportunity for more site specific issues to be addressed. Impacts could be significantly positive depending on the level of detail included in the policy regarding the coastal defences and flood risk.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
11. To improve soil quality	?	SA1 does not include any references to remediating contaminated land and it is unknown whether any of the seafront sites include contaminated land. Impacts are uncertain.	?	This option may provide the opportunity for any site specific contamination issues to be addressed, however impacts are uncertain as site contamination issues are unknown.	?	Impacts considered to be the same as option 1.
12. To minimise and sustainably manage waste	0	There are no direct links with this objective.	0	There are no direct links with this objective.	0	There are no direct links with this objective.
13. To make the best use of land	++	SA1 includes the King Alfred Strategic Allocation which requires	++	Site allocations may provide greater certainty and	++	Impacts considered to be the same as option 1.

available		a minimum of 400 dwellings as well as leisure uses. This would result in a high density development having positive impacts for this objective. SA1 also promotes the regeneration of underutilised sites along the seafront which would also make better use of existing sites.		confidence for applicants and may help to bring sites forward, helping to make better use of the land available in the city. Requirements provided within the site allocations could also consider appropriate mix of uses/densities and could therefore encourage the best use of the site. Impacts have potential to be significantly positive.		Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	The King Alfred Strategic Allocation includes 400 residential units. This should have a significant positive impact on this objective.	0	It is considered unlikely that any further residential development will come forward along the seafront. Site allocations more likely to be for leisure/retail uses. No impacts anticipated.	0	Unlikely that an SPD will include further guidance relating to residential development.
15. To improve the range, quality and accessibility of services and facilities.	+	SA1 requires enhancement and improvements to the public realm, which should also help improve access. SA1 should result in improved access to the seafront for all and the various facilities located there. Impacts considered to be positive.	++	This option could result in a more diverse mix of uses, through site allocations and may also help bring forward improvements to the public realm, improving access. Impacts could be significantly positive depending on the range of uses.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
Summary	All options should result in positive impacts. Option 2 has greater potential for more significant positive impacts as site allocations may help to bring forward a diverse mix of uses.					
16. To improve health and well-	+	SA1 should result in positive impacts for health through	+?	Seafront development and site allocations could include those	+	Impacts considered to be the same as option 1.

being, and reduce inequalities in health		improved access and the recognition of the role of the seafront for recreation, exercise and leisure purposes.		used for recreation and leisure purposes which would impact positively on health, although this is uncertain until uses are known.		Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
17. To improve community safety, and reduce crime and fear of crime	+	SA1 includes various priorities that would help improve safety, including road safety, as well as crime prevention, e.g. through appropriate lighting.	0	It is considered unlikely that this option will include any greater consideration or detailed measures which will reduce crime or improve safety. No impacts anticipated.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	The seafront is a key destination for residents and visitors and contains some important development sites. The various priorities set out in SA1 should help ensure the seafront remains an attractive destination, helping to support tourism and therefore contributing towards economic growth. Impacts considered to be significantly positive.	++	This option would provide a clear approach to assessing applications in this location. Site allocations may provide greater certainty and confidence for applicants and may help to bring sites forward further supporting economic growth. Impacts likely to be significantly positive.	++	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.

## Summary

### Option 1 – CPP1 and emerging CPP2

- This option was found to have potential for significant positive impacts for housing, due to the King Alfred Strategic Allocation; for making the best use of land, due to the strategic allocation and also due to the potential to regenerate underutilised sites; and for economic development, through the support for regeneration of the seafront.
- This option was found to have positive impacts for a number of other objectives : biodiversity, through requirements to conserve coastal habitats; open space, through recognition of the open space offer provided by the seafront; SDNP, through requirements for there to be no adverse impacts on the setting of the SDNP; historic built environment, through preservation and enhancement of adjacent heritage assets; water quality, through the requirements for waste-water infrastructure and water efficiency requirements; flood risk and climate change adaptation, through the priority to maintain coastal defences and to take account of flood risk; greenhouse gas reduction, through encouragement of opportunities for low/zero carbon infrastructure; improving access to services and facilities through improvements to public realm; health, through ongoing improvements to the seafront and opportunities for health beneficial recreation; and community safety, through improvements to road safety and opportunities to design out crime.
- This option was found to have potential for mixed (-/+) impacts for the objectives for reducing the need to travel and air quality, due to the potential for development to increase journeys made, however reflecting the aspirations of the policy to improve access, as well as taking into consideration other CPP1 strategic policy.

### Option 2 – site allocations

With this option, many of the impacts have a certain degree of uncertainty as the level of detail and content of the policy is unknown. Therefore, results represent best case scenario.

- This option was found to have potential for significant positive impacts for biodiversity, historic built environment, flood risk, and climate change adaptation, as site allocations may provide the opportunity to address any relevant site specific issues. However this is dependent on the location of the sites and whether the site allocations addressed these concerns.
- This option was also found to have potential for significant positive impact for making the best use of land, as site allocations could provide the opportunity to guide the mix of uses, densities and so on, and therefore ensure the most efficient use of the site is made; improved access and delivery of facilities, as site allocations could help bring forward a range of diverse uses; and economic development, as site allocations could provide greater certainty for developers and help to bring development forward.
- This option was also found to have positive impacts for open space, as may help to make better use of under-utilised areas of open space, and health, as allocations could include uses that provide for recreation or have health benefits, although this is uncertain as the range of uses are not known.
- This option was found to have potential for mixed (-/+) impacts for the objectives for reducing the need to travel and air quality, due to the potential for development to increase journeys made, however reflecting the opportunity for site allocations to address site specific transport and air quality issues.



- Unlike options 1 and 3, where impacts were positive, this option was found to have no impacts on objectives for the SDNP, water quality, reducing greenhouse gas emissions, housing, and community safety. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that this option would provide any further details on the issue, nor provide any additional housing allocations.

### Option 3 – SPD

Impacts for this option were largely similar to option 1. This is because an SPD can only provide guidance and cannot establish new policy, therefore policy would be set by CPP1 and CPP1 policies would still apply. There would be no opportunity to provide further consideration of site specific issues with this option.

### Summary/Preferred Option

- All of the options should result in largely positive effects.
- Option 1 has potential for positive impacts across a wider range of objectives than option 2, however this is because option 1 sets the strategy and covers a range of issues which are unlikely to be addressed further or repeated.
- Option 2, through site allocations, has potential for more significant positive impacts than option 1 across certain site-based objectives, as site allocations may provide the opportunity to address site specific issues, e.g. biodiversity and heritage considerations. This will depend on the location of the sites.
- Site allocations may also have greater benefits for economic development, as could provide certainty for developers and may help to bring forward development. They may also provide the opportunity to make the best use of land, through requirements relating to the mix of uses and densities.
- Option 2 is considered to be the preferred approach.

### CPP2 Options Appraisal – DM40 Air Quality

#### Options:

3. Detailed policy on transport/travel and air quality and noise issues
4. No additional policy – rely on Policy CP9 of the City Plan Part One

#### Assumptions

- This topic area is concerned with controlling the adverse transport impacts of development and is not concerned with promoting sustainable travel.

#### Appraisal

SA Objective	Option	Summary of Effects	Option	Summary of Effects
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	1		2	
6. To improve air and noise quality	++	This is the key issue that this policy area will address. Impacts are likely to be significantly positive.	+	Policy CP9 sets the strategic policy with regards to sustainable transport. This includes measures to help improve mobility across the city and reduce the impacts of traffic and this should have positive impacts on air and noise quality. However it does not provide a framework against which the specific air quality and transport impacts of development can be assessed and therefore these issues may not be fully addressed with this approach.
9. To reduce emissions of greenhouse gases that cause climate change	+	This option could have an indirect positive impact on this objective, as some air pollutants, namely nitrous oxides and carbon dioxide also contribute towards climate change. Any improvements or reduction in air pollutants will therefore also have an indirect positive impact on reducing greenhouse gases.	+	Same as option 1. Measures within CP9 promote sustainable transport, which should result in air quality improvements and contribute towards mitigating the effects of climate change.
16. To improve health and well-being, and reduce inequalities in health	++	Air and noise pollution can have adverse effects on health, particularly for vulnerable members of the community, including the young, old, or those with existing respiratory conditions. A policy which address air and noise issues would have a significant positive impact on health.	+	Policy CP9 sets the strategic policy with regards to sustainable transport. This includes measures to help improve mobility across the city and reduce the impacts of traffic and this should have positive impacts on air and noise quality, and therefore health. However it does not provide a framework against which the specific air quality and transport impacts of development can be assessed and therefore these issues may not be fully addressed with this approach.
18. To increase equality and social inclusion	+	Certain people are more vulnerable to the impacts of poor air quality. This includes those with protected characteristics including the young, old and those with certain health conditions. This option could therefore have an indirect positive effect on this objective by considering the needs of those with protected characteristics.	+	Policy CP9 sets the strategic policy with regards to sustainable transport. This includes measures to help improve mobility across the city and reduce the impacts of traffic and this should have positive impacts on air and noise quality, and therefore health and equalities.
19. To contribute towards the growth of	?	A policy on air quality would result in additional policy requirements to be met, however it is	+	CP9 should result in a sustainable transport system, and reduced congestion, both of which can aid economic development.

a sustainable and diverse economy, increase employment opportunities and meet local employment needs.		considered unlikely that these alone would result in development becoming unviable and not coming forward. Impacts are however uncertain.		
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**Summary**

**Option 1**

- There were 2 objectives where this option performed better than the other option (air and noise quality, and health) where the impacts were significantly positive compared to positive. A policy covering air and noise issues would help to directly address these issues, impacting on air quality, noise quality and health.
- There was 1 objective where this option had a more uncertain effect (economic development), compared to a more positive effect with the other option. It is uncertain whether specific policy requirements would result in unviable development and restrict economic growth.
- As with option 2, this option had potential to have indirect positive impacts for climate change mitigation and equalities. Any improvement or reduction in air pollutants would also indirectly contribute towards mitigating climate change, and would also help in considering the needs of people with certain protected characteristics, particularly the young, old, or those with health issues.

**Option 2**

- There were 2 objectives where this option did not perform as well as the other option (air and noise quality, and health) however it still resulted in a positive effect. Although CP9 should have positive impacts on air and noise quality due to the measures it contains, it does not provide a framework against which the specific air quality and other transport impacts (and therefore associated health impacts) of development can be assessed.
- There was one objective where this option performed better than the other option (economic development), where the impact was positive compared to uncertain. This is based on CP9 including measures which support sustainable transport and reduce congestion, both of which would support economic growth.
- As with option 1, this option had potential to have positive impacts for climate change mitigation and equalities.

**Preferred Option**

- Option 1 has greater potential for more significant positive impact on the key objectives associated with this policy area: air and noise quality, and health. However, if pursued as the preferred option, it would need to ensure that any policy requirements are not unduly onerous and that they would not prevent the viability of development.

## CPP2 Options Appraisal – DM40 Lighting & Floodlighting

### Issues and Options

- Option 1) No specific policy. Rely on NPPF (paras 109-125) and high level policies CP16 Open Space and CP8 Sustainable Buildings in CPP1 and more detail in an SPD
- Option 2) Have a single policy in CPP2 just covering lighting and floodlighting
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail

### Assumption

Assume that options 3 and 4 would cover the issue of lighting and floodlighting, as well as other forms of pollution and nuisance, including contaminated land, water pollution, noise, dust, dirt, particulates, fumes, gases, steam, smell, radiation, vibration, light, smoke, heat which affects the natural environment.

### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	NPPF para 125 requires the impacts of light pollution from development to be limited. This will have positive effects for biodiversity. CP16 requires proposals for lighting on open space to minimise light pollution. Impacts should be	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing light pollution from all types of development. This would have significant positive impacts for biodiversity.	+?	A generic brief policy covering a range of topics could have positive effects on biodiversity, as is likely to lead to protection of the environment, including biodiversity, however is also uncertain as issues associated with light pollution may not be addressed adequately.	++?	A generic detailed policy covering a range of topics could have positive effects on biodiversity, as may lead to its protection or enhancement. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.

		positive.						
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	This option could have positive impacts on this objective as may result in better or improved open space through provision of appropriate lighting.	+	Impacts the same as option 1.	+	Impacts the same as option 1.	+	Impacts the same as option 1.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	Paragraph 125 of NPPF specifically refers to limiting the impact of light pollution on dark landscapes, which would have a positive effect for this objective.	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing light pollution. This would have a positive impact on this objective as would contribute towards protecting the dark skies reserve status of the SDNP.	+?	This option would only cover light pollution in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address light pollution, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering light pollution would need to be clear and defined.
6. To improve air and noise quality	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy would cover air/noise pollution in brief alongside other issues. Although this would streamline policy and address overlap, this	++?	A generic detailed policy would include specific criteria and considerations to address air/noise pollution, and impacts could be significantly positive. However there is a risk that

						approach may not adequately address issues.		this option would result in a lengthy policy that may affect usability and affect what is delivered.
7. To improve water quality (ecological, chemical and quantity status)	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy would cover water quality in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	A generic detailed policy would include specific criteria and considerations to address water quality, and impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
11. To improve soil quality	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy would cover soil quality in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	A generic detailed policy would include specific criteria and considerations to address soil quality, and impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
16. To improve health and well-being, and reduce inequalities in health	+	This option should lead to the prevention of light pollution which will direct benefits for health.	+	This option should lead to prevention of light pollution. This would have direct benefits for health.	++	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct	++?	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.

						benefits for health.		
17. To improve community safety, and reduce crime and fear of crime	+	Although this option mainly addresses the adverse impacts of lighting, appropriate lighting can have benefits for community safety and crime prevention. Impacts therefore considered to be positive.	++	This option has potential for more significant positive impact on this objective as would provide the opportunity to promote and clarify the link between lighting and crime reduction.	+?	A generic brief policy is more likely to address issues of light pollution rather than promote the benefits of appropriate lighting in terms of supporting crime reduction. Impacts are considered to be positive yet uncertain, as the content and detail of the policy are unknown.	+?	Impacts the same as option 3.

### Summary

#### Option 1 – no policy

- This option has potential for positive impacts for a number of objectives including: biodiversity, as will minimise impacts of light pollution on biodiversity; open space, through improvements to open space through appropriate lighting; SDNP through protection of the dark landscapes; health, through minimisation of health impacts associated with too much/too little lighting; and community safety through the links between appropriate lighting and crime prevention.

#### Option 2 – specific policy

- This option has potential for significant positive impacts for a number of objectives including: biodiversity and SDNP as light pollution and its impacts will be minimised; and community safety through the potential for the policy to highlight the link between appropriate lighting and crime prevention.
- This option also had the potential for positive impacts open space through the potential for improvements to open space; and health through minimisation of health impacts associated with lighting.

#### Option 3 – generic brief policy

- This option has potential for significant positive impacts for health, as a generic policy which covers various topics should lead to conservation of various aspects of the environment, having benefits for health.

- This option has potential for positive yet uncertain impacts for a number of other objectives, with the uncertainty due to the actual contents of the policy being unknown. Objectives are: biodiversity, open space, the SDNP and community safety for reasons described under options 1 and 2; and for air/noise quality, water quality, and soil quality as a generic policy will also address these issues.

#### Option 4 – generic detailed policy

- This option has potential for significantly positive yet uncertain impacts for a number of objectives. Impacts are considered to be more significant than option 3, due to the added detail of the policy, however are also more uncertain as the length of a detailed policy that covers a range of issues may affect usability and what is delivered. Objectives are: biodiversity; open space; SDNP; air/noise quality; water quality; and soil quality.
- This option has potential for positive impacts for community safety. This was not considered to be significant, as although the policy would address light pollution it would be unlikely to promote the benefits of appropriate lighting in the way that a dedicated policy could.

#### Overall summary

- Options 3 and 4 have potential for a positive impact across a greater range of objectives than options 1 and 2. However this is due to options 3 and 4 covering a wider range of topics and therefore makes it difficult to compare with options 1 and 2. There is also some uncertainty with options 3 and 4 as the specific contents of the policy and what it would address are unknown. Although there is some merit in combining issues into one policy, there is concern that the issues may not be covered as adequately or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.
- The key objectives for this subject matter are objectives 1: biodiversity; 3: SDNP and 17: community safety. Option 2 has potential for significant positive impact across all these objectives; whereas option 4 had potential for significant positive impact across two out of the three objectives.

### **CPP2 Options Appraisal – DM40 Pollution & Nuisance**

#### **Issues and Options**

- Option 1) No specific policy. Rely on NPPF (paras 109-125) and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 and provide detail in SPD
- Option 2) Have a single policy in CPP2 just covering pollution and nuisance control
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail



## Assumptions

- Pollution and nuisance include noise, dust, dirt, particulates, fumes, gases, steam, smell, radiation, vibration, light, smoke, heat and other polluting and nuisance emissions which affects the natural environment, including to air, land and water.
- Assume that options 3 and 4 would cover the above issues as well as invasive and protected species, land contamination and water quality, however actual detail for this is unknown.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	NPPF requires pollution and adverse effects on the natural environment to be minimised. This includes effects on biodiversity. CP8 requires development to enhance biodiversity. Impacts should be positive.	+	This option should include criteria to protect the natural environment, which will include biodiversity from pollution. Impacts should therefore be positive.	+?	A generic brief policy covering a range of topics could have positive effects on biodiversity, as is likely to lead to protection of the environment, including biodiversity, however is also uncertain as issues may not be addressed adequately.	+?	A generic detailed policy covering a range of topics could have positive effects on biodiversity, as may lead to its protection or enhancement. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+?	This could have an indirect positive effect on open space, e.g. through the protection of species/biodiversity or prevention of pollution to the environment.	+?	A policy that protects certain species/biodiversity from pollution could have an indirect positive effect on open space, as could protect these types of habitats.	+?	A generic brief policy covering a range of topics could have indirect positive effects on open space, as may lead to its protection or enhancement of species including their habitats.	+?	A generic detailed policy covering a range of topics could have indirect positive effects on open space, as may lead to its protection or enhancement of species/biodiversity including their habitats. However there is a risk that this option would result in a lengthy policy that may

								affect usability and affect what is delivered.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	Paragraph 125 of NPPF specifically refers to limiting the impact of light pollution on dark landscapes, which would have a positive effect for this objective.	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing light pollution. This would have a positive impact on this objective as would contribute towards protecting the dark skies reserve status of the SDNP.	+?	This option would only cover light pollution in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address light pollution, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering light pollution would need to be clear and defined.
6. To improve air and noise quality	+	NPPF paras 109-125 have various requirements relating to air and noise pollution. CP8 requires development to reduce air pollution. Impact should be positive.	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing air and noise pollution. This would have a positive impact on this objective.	+?	This option would only cover air/noise pollution in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address air/noise pollution, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering air/noise

								pollution would need to be clear and defined.
7. To improve water quality (ecological, chemical and quantity status)	+	NPPF paras 109-125 include preventing pollution of water from development. CP8 requires development to reduce water pollution. Impacts should be positive.	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing water pollution. This would have a positive impact on this objective.	+?	This option would only cover water pollution in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address water pollution, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering water pollution would need to be clear and defined.
11. To improve soil quality	+	NPPF paras 109-125 include preventing pollution of soils from development. CP8 requires development to reduce land pollution. Impacts should be positive for this objective.	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing pollution to land including soil. This would have a positive impact on this objective.	+?	This option would only cover soil/land pollution in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address soil/land pollution, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the

								policy covering water pollution would need to be clear and defined.
16. To improve health and well-being, and reduce inequalities in health	+	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.	++	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.	++	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.	++?	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.

### Summary

#### Option 1 – no policy

- This option has potential for positive impacts for a number of objectives including: biodiversity, through the strategic level of protection provided for biodiversity by this approach; open space, through the indirect protection of open spaces, particularly natural/semi-natural that may occur through the protection of the environment although this is fairly uncertain; the SDNP through the requirement to limit the impact of light pollution; air/noise quality through requirements to reduce air pollution; water quality through the requirement to prevent water pollution; soil quality, through the requirement to prevent pollution to soils and land; and health, through the prevention of various forms of pollution and the link to health.

#### Option 2 – specific policy

- This option has potential for significant positive impacts for a number of objectives including SDNP, through the potential to prevent light pollution that may affect the special qualities of the SDNP; air/noise quality, by addressing air/noise pollution; water quality, by addressing water pollution; soil quality by addressing pollution to land; and health through the various health benefits that should occur through addressing various forms of environmental pollution.
- This option has also potential for indirect positive impacts for biodiversity, through the protection of the environment from pollution; and for open space, through the indirect protection of open spaces, particularly natural/semi-natural that may occur through the protection of biodiversity although this is fairly uncertain.

#### Option 3 – generic brief policy

- This option has potential for significant positive impacts for health, as a policy which prevents environmental pollution would have multiple health benefits.
- This option has potential for positive yet uncertain impacts for a number of other objectives, as the content of the policy is unknown, including biodiversity, due to the prevention of pollution to the environment, and for open space, via the protection of biodiversity; the SDNP, as the policy could help to address

light pollution; air/noise quality, as the policy could address these forms of pollution; water quality, as the policy could address water pollution; and soil quality, as the policy could address land contamination.

#### Option 4 – generic detailed policy

- This option has potential for significantly positive yet uncertain impacts for a number of objectives. Impacts are considered to be more significant than option 3, due to the added detail of the policy, however are also uncertain as the length of a detailed policy that covers a range of issues may affect usability and what is delivered. Objectives are: SDNP, air/noise quality, water quality, soil quality as the policy should address these forms of pollution; and health as the prevention of environmental pollution will have health benefits.
- This option has potential for positive yet uncertain impacts for biodiversity and open space, due to the prevention of pollution to the environment.

#### Overall summary/preferred option

- All options were found to result in beneficial impacts across the same range of objectives.
- Options 1 and 3 were found to have broadly similar impacts in terms of significance, although impacts with option 3 are more uncertain. It is not clear how a generic brief policy could address issues in any more detail than the strategic approach of the NPPF and existing adopted CPP1.
- Options 2 and 4 were found to have broadly similar impacts in terms of significance, although the results for option 4 were found to be more uncertain based on the length of the policy and the potential this may have for affecting usability. However, option 4 could deliver similar results to option 2 if the policy was clear and defined.
- The key objectives for this subject matter are covered by objectives 6: air/noise quality; 7: water quality and 11: soil quality. Both options 2 and 4 had potential for significant positive impacts against these objectives. However, as discussed, there is some concerns regarding the usability of a detailed policy that addressed a number of issues.
- There is some merit in combining issues into one policy, however there is concern that the issues may not be covered as adequately (e.g. would this policy adequately address protected species?) or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.

### CPP2 Options Appraisal – DM41 Hazardous Substances

#### Issues and Options

- Option 1) No specific policy. Rely on NPPF (paras 109-125 esp. 120, 121, 122 & 123)
- Option 2) Have a single policy in CPP2 just covering hazardous substances and high pressure pipelines
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters, including hazardous substances and high pressure pipelines in overview/brief

- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including hazardous substances and high pressure pipelines in detail

**Assumption**

- Hazardous substances include substances that could be harmful to human health or the environment, including the aquatic environment e.g. explosives, flammable gases, and chemicals.
- Assume that options 3 and 4 would cover the issue of hazardous substances and high pressure pipelines, water pollution, polluted land and buildings, as well as other forms of pollution and nuisance, including noise, dust, dirt, particulates, fumes, gases, steam, smell, radiation, vibration, light, smoke, heat which affects the natural environment.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	Various forms of pollution can arise from hazardous substances including those that harm biodiversity. Para 120 requires prevention of pollution and taking into account the effects of pollution on the environment. Although this does not specifically refer to pollution from hazardous substances, this should result in positive effects for biodiversity in	++	This option would result in a policy that contains specific criteria and considerations that are applicable to hazardous substances. This should include consideration of the natural environment which would have a positive impact on biodiversity.	+?	This option would only cover biodiversity impacts in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues associated with hazardous development.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address impacts on the natural environment, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.

		relation to this form of development.						
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy covering a range of topics could have indirect positive effects on open space, as may lead to its protection or enhancement of species including their habitats. Although this would streamline policy and address overlap, this approach may not adequately address issues.	+?	A generic detailed policy covering a range of topics could have indirect positive effects on open space, as may lead to its protection or enhancement of species/biodiversity including their habitats. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy covering a range of topics could have positive effects on this objective as may include considerations to address light pollution. Although this would streamline policy and address overlap, this approach may not adequately address issues associated with hazardous development.	++?	A generic detailed policy covering a range of topics could have a significantly positive impact on this objective as may include consideration of light pollution. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
6. To improve air and noise quality	+	Atmospheric pollution could arise	++	This option has potential for significant positive	+?	This option would only cover air/noise impacts	++?	If this option provided similar detail as option 2,

		<p>from hazardous substances. There could also be noise impacts arising from development.</p> <p>Para 120 requires all development to be suitable for its location and should therefore minimise the potential for air and noise impacts arising from development, although it does not specifically refer to hazardous development.</p>		<p>impact on this objective as should set out specific criteria and considerations that are applicable to hazardous development. This should help to minimise any potential for air and noise impacts.</p>		<p>in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues associated with hazardous development.</p>		<p>such as specific criteria and considerations to address air and noise impacts on the natural environment, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.</p>
7. To improve water quality (ecological, chemical and quantity status)	+	<p>NPPF paras 109-125 include preventing pollution of water from development. Para 120 requires all development to be suitable for its location. Some hazardous substances may result in pollution of water and this option should help to prevent this through appropriate</p>	++	<p>This option would result in a policy that contains specific criteria and considerations that are applicable to hazardous development. E.g. consideration of location and risk of pollution to water, e.g. if within a GSPZ. This option has potential for significant positive impact on this objective.</p>	+?	<p>This option would only cover water quality impacts alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues associated with hazardous development.</p>	++?	<p>If this option provided similar detail as option 2, such as specific criteria and considerations to address air and noise impacts on the natural environment, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.</p>



		location of development. Impacts should be positive.						
11. To improve soil quality	-/+	NPPF paras 109-125 include preventing pollution of soils from development and remediating and mitigating despoiled, degraded, contaminated land. Hazardous substances can result in the contamination of land, and therefore impacts are considered to be mixed, although the NPPF also requires future remediation.	-/++	This option would result in a policy that contains specific criteria and considerations that are applicable to hazardous developments and this is likely to include pollution to land. However as hazardous development can result in contamination of land and therefore impacts are considered to be mixed. If this option is pursued, the policy should consider referring to the need to remediate any future contamination resulting from hazardous development.	-/+?	This option would cover land/soil quality impacts alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues associated with hazardous development. If this option is pursued, the policy should consider referring to the need to remediate any future contamination resulting from hazardous development.	-/++?	If this option provided similar detail as option 2, such as specific criteria and considerations that are applicable to hazardous development and the potential for pollution of land, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this option is pursued, the policy should consider referring to the need to remediate any future contamination resulting from hazardous development.
16. To improve health and well-being, and reduce inequalities in health	+	Para 120 and 123 require the potential for effects on health and amenity to be considered including noise impacts, although it does not specifically refer to	+	This option would result in a policy that contains specific criteria and considerations that are applicable to hazardous developments including consideration of health impacts. This option is	++	This option should lead to the conservation of the natural environment and prevention of various forms of pollution, having health benefits, including consideration	++?	This option should lead to the conservation of the natural environment and prevention of various forms of pollution, having health benefits, as well as the consideration of health issues of relevance to

		impacts from hazardous development. This option should therefore have positive results for this objective.		also likely to include amenity of future occupants. This option is considered to have positive impacts on health.		of health issues of relevance to hazardous developments. This would have direct benefits for health.		hazardous developments. This would have direct benefits for health.
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### Summary

#### Option 1 – no policy

- There are no adverse impacts with this option.
- This option has potential for positive impacts for a number of objectives including: biodiversity, through consideration of effects of development on the natural environment; air/noise quality, through the requirement for development to be appropriate for its location; water quality through the requirement for development to be appropriate for its location; soil quality, through the requirement to remediate contaminated land; and health, through the consideration of health and amenity impacts arising from hazardous development.

#### Option 2 – specific policy

- There are no adverse impacts with this option.
- This option has potential for significant positive impacts for air/noise quality through the consideration of the potential for air/noise quality impacts arising from hazardous development; water quality through the consideration of the appropriate location of hazardous development and how it can effect water quality; and soil quality through potential to minimise pollution to land.
- This option also had the potential for positive impacts for biodiversity through the consideration of the impacts on the natural environment; and health, through the consideration of health and amenity impacts arising from hazardous development.

#### Option 3 – generic brief policy

- There are no adverse impacts with this option.
- This option has potential for significant positive impacts for health, as a generic policy covering a range of issues, including hazardous development, should minimise environmental pollution and health and amenity impacts having multiple health benefits.
- This option has potential for positive yet uncertain impacts for a number of other objectives, with the uncertainty due to the actual contents and level of detail of the policy being unknown. Objective are: biodiversity, as the policy could help prevent pollution of the natural environment; open space, due to protection of biodiversity; SDNP, through potential to minimise light pollution; air/noise, water and soil quality through potential to address these forms of pollution.

Option 4 – generic detailed policy

- There are no adverse impacts with this option.
- This option has potential for significantly positive yet uncertain impacts for a number of objectives. Impacts are considered to be more significant than option 3, due to the added detail of the policy, however are also more uncertain as the length of a detailed policy that covers a range of issues may affect usability and what is delivered. Objectives are: biodiversity, open space, SDNP, air/noise quality, water quality, soil quality and health.

Overall summary / preferred approach

- Options 2 and 4 have the most potential for significant positive impact. Option 4 becomes more uncertain as the length of a policy could affect its usability and ultimately could affect how well the issue is addressed.

**CPP2 Options Appraisal – DM41 Land Stability**

**Issues and Options**

- Option 1) No specific policy. Rely on NPPF (paras 109-125), CPP1 SA1 The Seafront, and provide detail in SPD
- Option 2) Have a single policy in CPP2 just covering land stability
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in detail

**Assumption**

- Assume that options 3 and 4 would cover the issue of land stability, as well as other forms of pollution and nuisance, including land contamination, water pollution, noise, dust, dirt, particulates, fumes, gases, steam, smell, radiation, vibration, light, smoke, heat which affects the natural environment.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy covering a range of topics could have positive effects on biodiversity, as is likely to lead to protection of the environment,	++?	A generic detailed policy covering a range of topics could have positive effects on biodiversity, as may lead to its protection or enhancement. However there is a risk that

						including biodiversity, alongside consideration of other issues, however is also uncertain as issues may not be addressed adequately.		this option would result in a lengthy policy that may affect usability and affect what is delivered.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	A generic brief policy covering a range of topics could have positive effects on the SDNP as would include consideration of light pollution alongside other, however is also uncertain as issues may not be adequately addressed.	++?	A generic detailed policy covering a range of topics could have positive effects on the SDNP, as would include consideration of light pollution. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
6. To improve air and noise quality	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	This option would only cover air/noise pollution in brief alongside other issues. Although this would have positive impacts, this approach may not adequately address issues.	++?	A generic detailed policy covering a range of topics could have significant positive effects on this objective. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
7. To improve water quality (ecological, chemical and quantity status)	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	This option would only cover water pollution in brief alongside other issues. Although this would have a positive	++?	A generic detailed policy covering a range of topics could have significant positive effects on this objective. However there is a

						impact for this objective, this approach may not adequately address issues.		risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
11. To improve soil quality	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	This option would only cover soil/land pollution in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	A generic detailed policy covering a range of topics could have significant positive effects on this objective. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
13. To make the best use of land available	+	NPPF paras 120 and 121 require development to be appropriate for its location, including consideration of land instability. SA1 should ensure that all cliff-top proposals are examined in terms of land stability. Impacts should be positive as should support development in appropriate locations and make the best use of land.	++	This option would set out the specific considerations and criteria applicable to addressing and ensuring land stability. Impacts should be significantly positive as should support development in appropriate locations and make the best use of land, as well as being able to provide a local context.	+?	This option would only cover making the best use of land through ensuring development is appropriate to its location alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	A generic detailed policy covering a range of topics could have significant positive effects on this objective. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering appropriate location and land stability would need to be clear and defined.

16. To improve health and well-being, and reduce inequalities in health	+	This option should lead to the appropriate location of development and would minimise the risk of any adverse impacts on health resulting from land instability.	+	This option should lead to the appropriate location of development and would minimise the risk of any adverse impacts on health resulting from land instability.	++	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.	++?	This option should lead to the conservation of the natural environment and prevention of various forms of pollution. This would have direct benefits for health.
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#### Option 1 – no policy

- There are no adverse impacts with this option.
- This option has potential for positive impacts for: making the best use of land, through ensuring the appropriate locations of development and making the best use of sites available; and health through minimising health impacts associated with unstable land.

#### Option 2 – specific policy

- There are no adverse impacts with this option.
- This option has potential for significant positive impacts for making the best use of land, through ensuring the appropriate locations of development and making the best use of sites available;
- This option also has potential for positive impacts for health through minimising health impacts associated with unstable land.

#### Option 3 – generic brief policy

- There are no adverse impacts with this option.
- This option has potential for significant positive impacts for health, as a generic policy covering a wide range of issues should prevent various forms of environmental pollution, having multiple health benefits.
- This option has potential for positive benefits a number of other objectives, however impacts are also uncertain as the actual contents of the policy being unknown. This include: biodiversity, as the policy could help protect biodiversity and habitats; SDNP, as the policy could help to address light pollution; air/noise quality, as the policy could address these forms of pollution; water quality and soil quality, as the policy could address these forms of pollution; making the best use of land available, through appropriate locations for development; and health through the prevention of various forms of pollution.

#### Option 4 – generic detailed policy

- There are no adverse impacts with this option.
- This option has potential for significantly positive yet uncertain impacts for a number of objectives. Impacts are considered to be more significant than option 3, due to the added detail of the policy, however are also more uncertain as the length of a detailed policy that covers a range of issues may affect usability and what is delivered. Objectives biodiversity; SDNP; air/noise quality; water quality; soil quality, making the best use of land, and health.

### **Overall summary**

- None of the options resulted in adverse impacts.
- Options 3 and 4 have potential for a positive impact across a greater range of objectives than options 1 and 2. However this is due to options 3 and 4 covering a wider range of topics and therefore makes it difficult to compare with options 1 and 2. There is also some uncertainty with options 3 and 4 as the specific contents of the policy and what it would address are unknown. Although there is some merit in combining issues into one policy, there is concern that the issues may not be covered as adequately or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.
- The key objective for this subject matter are objectives 13: making the best use of land. Both options 2 and 4 had potential for significant positive impact against this objective. However, as discussed, there is some concerns regarding the usability of a detailed policy that addressed a number of issues.

### **CPP2 Options Appraisal – DM41 Polluted Land & Buildings**

#### **Issues and Options**

- Option 1) No specific policy. Rely on NPPF (paras 109-125) and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 (esp. DA2.2) and provide detail in SPD
- Option 2) Have a single policy in CPP2 just covering polluted land buildings
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail

#### **Assumption**

- Polluted land and buildings policy would address issues arising from the redevelopment of contaminated land and buildings.
- Assume that options 3 and 4 would cover the issue of polluted land and buildings, as well as other forms of pollution and nuisance, including noise, dust, dirt, particulates, fumes, gases, steam, smell, radiation, vibration, light, smoke, heat which affects the natural environment.

## Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects	Option 4	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	0	There may be benefits to biodiversity from remediation of contaminated land, however these are considered to be fairly indirect.	0	There may be benefits to biodiversity from remediation of contaminated land, however these are considered to be fairly indirect.	+?	A generic brief policy covering a range of topics could have positive effects on biodiversity, as is likely to lead to protection of the environment, including biodiversity.	+?	A generic detailed policy covering a range of topics could have positive effects on biodiversity, as may lead to its protection or enhancement. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	There may be benefits to open space from remediation of contaminated land, however these are considered to be fairly indirect.	0	There may be benefits to open space from remediation of contaminated land, however these are considered to be fairly indirect.	+?	A generic brief policy covering a range of topics could have indirect positive effects on open space, as may lead to its protection or enhancement of species including their habitats.	+?	A generic detailed policy covering a range of topics could have indirect positive effects on open space, as may lead to its protection or enhancement of species/biodiversity including their habitats. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
3. To protect, conserve and enhance the South Downs National Park and	0	There are no impacts on this objective.	0	There are no impacts on this objective.	+?	This option could have a positive impact if it included criteria to address light pollution. Although this would	++?	If this option included specific criteria and considerations to address light pollution, then impacts could be significantly



its setting, and improve sustainable access to it						streamline policy and address overlap, this approach may not adequately address issues.		positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering light pollution would need to be clear and defined.
6. To improve air and noise quality	0	There are no direct impacts on this objective.	0	There are no direct impacts on this objective.	+?	This option could have a positive impact on this objective if it included criteria to address air/noise pollution. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	As option 3, this option could have a positive impact on this objective if it included criteria to address air pollution. Impacts could be more significant than option 3 if greater detail is provided. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered.
7. To improve water quality (ecological, chemical and quantity status)	+	NPPF paras 109-125 include preventing pollution of water from development. CP8 requires development to reduce water pollution. Remediation of contaminated land can impact positively	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing remediation of contaminated land and buildings. As contaminated land can have an impact on water quality, this would have	+?	This option would only cover remediation of contaminated land in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address contaminated land and the link to water pollution, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may

		on water quality. Impacts should be positive.		a significantly positive impact on this objective.				affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering contaminated land and water pollution would need to be clear and defined.
11. To improve soil quality	+	NPPF paras 109-125 include preventing pollution of soils from development and remediating and mitigating despoiled, degraded, contaminated land. CP8 requires development to reduce land pollution. Impacts should be positive for this objective.	++	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing contaminated land. This would have a positive impact on this objective.	+?	This option would only cover remediation of contaminated land in brief alongside other issues. Although this would streamline policy and address overlap, this approach may not adequately address issues.	++?	If this option provided similar detail as option 2, such as specific criteria and considerations to address contaminated land, then impacts could be significantly positive. However there is a risk that this option would result in a lengthy policy that may affect usability and affect what is delivered. If this approach were to be pursued, the section of the policy covering contaminated land and buildings would need to be clear and defined.
13. To make the best use of land available	+	NPPF paras 109-125 include remediating and mitigating despoiled, degraded, contaminated land. This could have an indirect positive	+	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing contaminated land. This would have an indirect	+?	This option would result in a policy that addressing contaminated land amongst other issues. This would have an indirect positive impact	+?	This option would result in a policy that contains specific criteria and considerations that are applicable to addressing contaminated land amongst other issues. This would have an indirect

		effect on this objective through making better use of existing land.		positive impact on this objective through making better use of existing land.		on this objective through making better use of existing land.		positive impact on this objective through making better use of existing land. Impacts become uncertain due to the length and usability of the policy.
16. To improve health and well-being, and reduce inequalities in health	+	This option should lead to the remediation of contaminated land, which could have benefits for health.	+	This option should lead to the remediation of contaminated land, which could have benefits for health.	++	This option should lead to the conservation of the natural environment and prevention of various forms of pollution as well as the remediation of contaminated land. This would have direct benefits for health.	++?	This option should lead to the conservation of the natural environment and prevention of various forms of pollution as well as the remediation of contaminated land. This would have direct benefits for health.

#### Option 1 – no policy

- This option has potential for positive impacts for a number of objectives including: water quality through the link between remediation of contaminated land and water pollution; soil quality, through the potential to remediate contaminated land; making the best use of land available through the potential to bring derelict/contaminated sites into active uses, and health, through potential to remediate contaminated land and the links to health.

#### Option 2 – specific policy

- This option has potential for significant positive impacts for a water quality and soil quality by remediating contaminated land.
- This option also had the potential for positive impacts for making the best use of land available through the potential to bring derelict/contaminated sites into active uses, and health, through potential to remediate contaminated land and the links to health.

#### Option 3 – generic brief policy

- This option has potential for significant positive impacts for health, as a policy which should remediate contaminated land and prevent environmental pollution, having multiple health benefits.

- This option has potential for positive yet uncertain impacts for a number of objectives, with the uncertainty due to the actual contents of the policy being unknown. Objectives are: biodiversity and open space, as the policy could help protect biodiversity and habitats; SDNP, as the policy could help to address light pollution; and air/noise quality, as the policy could address these forms of pollution; water quality and soil quality, as the policy could result in remediation of contaminated land having benefits for water and soil; and for making the best use of land available through the potential to bring derelict/contaminated sites into active uses.

#### Option 4 – generic detailed policy

- This option has potential for significantly positive yet uncertain impacts for a number of objectives. Impacts are considered to be more significant than option 3, due to the added detail of the policy, however are also uncertain as the length of a detailed policy that covers a range of issues may affect usability and what is delivered. Objectives are: SDNP, air/noise quality as the policy should address these forms of pollution; water quality and soil quality through remediation of contaminated land; and health as the prevention of environmental pollution will have health benefits.
- This option has potential for positive yet uncertain impacts for biodiversity and open space, due to the prevention of pollution to the environment; and making the best use of land due to the potential to bring back sites into active uses.

#### Overall summary

- Options 3 and 4 have potential for a positive impact across a greater range of objectives than options 1 and 2. However this is due to options 3 and 4 covering a wider range of topics and therefore makes it difficult to compare with options 1 and 2. There is also some uncertainty with options 3 and 4 as the specific contents of the policy and what it would address are unknown. Although there is some merit in combining issues into one policy, there is concern that the issues may not be covered as adequately or as clearly as a stand-alone policy and that the policy may be lengthy affecting both its usability and what it delivers.
- The key objectives for this subject matter are objectives 7: water quality; 11: soil quality and 13: making the best use of contaminated land. Both options 2 and 4 had potential for significant positive impact against objectives 7 and 11, and positive impacts for objective 13. However, as discussed, there is some concerns regarding the usability of a detailed policy that addressed a number of issues.

#### CPP2 Options Appraisal: DM42 Water Resources & Infrastructure

- Option 1) No detailed development management policy instead rely on NPPF and CPP1 (Policy CP7 Infrastructure and Developer Contributions and CP8 Sustainable Buildings) and DA policies.
- Option 2) Detailed development management policy that combines the policy issues of protection of water resources and water/ waste water infrastructure.

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	NPPF requires impacts on biodiversity to be minimised. CP8 requires development to enhance biodiversity. Impacts should be positive.	+	This option has potential for indirect positive impacts on this objective as should help ensure adequate provision of waste water infrastructure. This will have positive benefits for the aquatic environment.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	There is no direct impact on this objective. Addressed through other CPP1 policy.	+	The Brighton Chalk Aquifer lies under the city including areas within the SDNP. This includes some Groundwater Source Protection Zones 1 (inner zones). This option may therefore have an indirect positive impact on this objective, as may lead to greater protection/consideration of downland areas of the SDNP due to their importance for water resources.
7. To improve water quality (ecological, chemical and quantity status)	++	Brighton & Hove overlies a principal aquifer which is an important source of public water supply. Overall status of the aquifer is currently poor. NPPF requires the prevention of water pollution. CP8 requires development to meet certain standards of water efficiency, expects development to aspire to water neutrality and conserve water resources, reduce water pollution and safeguards water supplies if development is within a GSPZ. Some of the DA policies also have specific requirements relating to protection of groundwater resources. CP7 includes water infrastructure as a type of infrastructure for which developer contributions may be sought. Impacts should be significantly positive.	++	This option would allow for greater consideration of water resources and quality as an issue, as well as enable local circumstances to be taken into account (e.g. chalk soils, GSPZ). It would draw attention to water as an important issue, as the South East region is under water stress based on supply and demand. This option would ensure that water and waste-water infrastructure is delivered to meet development needs, ultimately benefiting water quality and helping to meet the requirements of the Water Framework Directive. It could also provide guidance on the types of infrastructure that are suitable for the underlying geology, e.g. types of SUDS, which would also have benefits for maintaining and improving water quality. Overall impacts should be significantly positive.
8. To reduce the risk from all sources of flooding to and from	+	Surface water flooding can result in pollution of water resources. CP8 requires development to reduce surface water run-off.	+	Delivery of water infrastructure could have dual benefits for both protecting water quality and reducing flood risk. Impacts for this objective considered to be positive.

development		Impacts should be positive.		
10. To increase the city's resilience and ability to adapt to climate change	+	Protection of water resources will be required in order to ensure the city can adapt to climate change. This option should have a positive impact on this objective through measures required to minimise water consumption, address flood risk and protect water quality.	+	This option should lead to protection of water resources which will help support climate change adaptation. It also has potential of helping to reduce flood risk through water infrastructure, which will also help the city adapt to a changing climate.
16. To improve health and well-being, and reduce inequalities in health	+	This option will lead to the protection of water resources through various policy requirements. This will have a direct impact on health, and therefore will have a positive impact on this objective.	+	Impacts considered to be the same as option 1.

### Summary

#### Option 1 – no policy

- This option was found to have potential for significant positive impacts for objectives for improving water quality, through requirements to minimise water consumption, increase water efficiency, reduce water pollution and safeguard source protection zones.
- This option was found to have potential for positive impacts for objectives for biodiversity, through requirements to enhance biodiversity as well as through the link between water infrastructure, clean water and the aquatic environment; flood risk, through the requirement for development to reduce surface water flood risk which will also help protect water resources; climate change adaptation, through requirements to conserve water resources and reduce flood risk; and improve health, through the protection of water supply.

#### Option 2 – detailed DM policy

- This option was also found to have potential for significant positive impacts for objectives for improving water quality, as should allow greater consideration of water resources and reflect local circumstances, as well as ensure water infrastructure is provided as required.
- This option was found to have potential for positive impacts for objectives for biodiversity, through the benefits that water infrastructure provision will have on aquatic biodiversity; the SDNP, as may lead to greater protection of source protection zones some of which are located within the SDNP; flood risk, through the delivery of water infrastructure which could reduce flood risk; climate change adaptation, through the protection of water resources and measures to reduce flood risk; and improve health, through the protection of water.

### Overall summary

- Both impacts resulted in fairly similar results, both likely to have significant positive impacts on the key objective for this policy area: water quality.
- Option 2 may have potential to have a positive impact on the SDNP through the protection of important source protection zones located there.
- Option 2 may have greater potential for more significant positive impact on the water quality objective as the policy would enable greater consideration of local circumstances affecting water quality.

### CPP2 Options Appraisal: DM43 Sustainable Urban Drainage

Option 1) No detailed development management policy framework to guide urban drainage solutions for new development instead rely on NPPF and City Plan Part One policies (CP7 Infrastructure and Developer Contributions, CP8 Sustainable Buildings; CP11 Managing Flood Risk).

Option 2) Detailed development management policy to guide urban drainage solutions for new development to be supported by technical guidance provided in a Sustainable Urban Drainage SPD.

#### Assumptions

- Assume that option 2 will not repeat any policy of a strategic nature that is included in CPP1.
- Assume that option 2 will provide detail of different types of SUDS that are suitable for the city

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	SUDS can be designed to include natural processes for managing surface water run-off, e.g. vegetation can slow and store water as well as providing filtration. SUDS features can therefore also support local biodiversity. CP8 requires development to reduce surface water run-off and enhance biodiversity, although does not contain any detail as to the potential links between biodiversity and SUDS. CP11 encourages flood risk management to achieve other sustainability objectives, including biodiversity. Impacts should be positive.	++	As described under option 1, SUDS can incorporate vegetation, can mimic the natural environment, e.g. ponds, and therefore have wider benefits for biodiversity. A detailed policy (and SPD) could therefore achieve a more significant positive effect for biodiversity, if it includes examples of, or encourages SUDS that have multi-functional benefits, including those for biodiversity.

2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	SUDS can be incorporated into existing open space, or can be designed to be an actual open space. However, CPP1 policies do not refer to this or provide details of this. Impacts therefore neutral.	++	This option provides the opportunity to provide examples of, or encourage delivery of SUDS which have multi-functional benefits, e.g. those that be used within open space, or as open spaces. SUDS can also contribute towards increasing green infrastructure. Impacts considered to be significantly positive.
7. To improve water quality (ecological, chemical and quantity status)	++	Surface water flooding can result in pollution of water resources. Brighton & Hove overlies a principal aquifer which is an important source of public water supply. Overall status of the aquifer is currently poor. NPPF requires the prevention of water pollution. CP8 requires development to meet certain standards of water efficiency, expects development to aspire to water neutrality and conserve water resources, reduce water pollution and safeguards water supplies if development is within a GSPZ, and reduce surface water run-off. Some of the DA policies also have specific requirements relating to protection of groundwater resources and surface water flood risk. CP7 includes flood risk prevention measures as a type of infrastructure for which developer contributions may be sought. CP11 requires development to have taken into account previous flooding events, including surface water flooding and to mitigate any potential risk, which will directly help water quality. Impacts should be significantly positive.	++	Surface water run-off can result in pollution to water resources. SUDS are used as a means of effectively managing rainfall where it falls, rather than channelling it back into the drainage system and therefore help reduce the risk of pollution to water resources that may otherwise occur from surface water run-off. This option provides the opportunity to include guidance on the types of SUDS that are suitable for the underlying geology and groundwater conditions, e.g. certain SUDS could potentially contaminate groundwater, and therefore the types of SUDS suitable will vary according to the GSPZ of a site. Guidance on the correct type of SUDS to be used should therefore have significant benefits for ensuring there is no decline in water quality and helping to improve water quality and therefore help to meet the objectives of the Water Framework Directive. Small-scale SUDS for individual developments can include e.g. rain-water harvesting. These can help to reduce water consumption as well as help to reduce surface water run-off, also benefiting water quality through a reduction in demand for water. Overall impacts should be significantly positive.
8. To reduce the risk from all sources of	++	Surface water flooding is one of the types of flooding that has occurred in the city.	++	SUDS are used as a means of effectively managing rainfall where it falls, rather than channelling it back into the drainage



flooding to and from development		<p>CP8 requires development to reduce surface water run-off. CP11 requires development to have taken into account previous flooding events, including surface water flooding and to mitigate any potential risk. CP11 refers to the Surface Water Management Plan however does not include any further guidance on managing surface water flooding. Some of the DA policies also have specific requirements relating to surface water flood risk.</p> <p>Impacts of option 1 should be significantly positive on this objective.</p>		<p>system. SUDS therefore can help to prevent existing drainage systems from becoming overloaded, which can in itself become a source of flood risk, as well as helping to manage flood risk from surface water that can occur particularly in urbanised environments.</p> <p>This option provides the opportunity to include guidance and greater detail on the types of SUDS that are suitable for local conditions which should have positive impacts for reducing flood risk. It would also provide the opportunity to provide more guidance on the placement of SUDS, e.g. linking them to the most up to date surface water flood map.</p> <p>Impacts of option 2 should be significantly positive on this objective.</p>
10. To increase the city's resilience and ability to adapt to climate change	+	<p>The risk of surface water flooding may increase with climate change, due to the anticipated increase in extreme weather events which can overload the drainage systems.</p> <p>Requirements within CP7, CP8 and CP11 regarding surface water flood risk will contribute towards climate change adaptation having a positive impact on this objective.</p>	++	<p>This option will provide the opportunity to provide guidance on the type of SUDS that will be suitable for the local area and may be more effective at managing water and thus reducing flood risk and helping adapt to climate change. This option will also provide the opportunity to include examples of SUDS that have wider benefits, e.g. biodiversity-based SUDS which also help with climate change adaptation in other ways, e.g. through maintaining temperature.</p> <p>Impacts of this option are considered to be significantly positive.</p>
11. To improve soil quality	+	<p>Although SUDS would not improve soil quality, SUDS could help to reduce the risk of soil pollution through the filtering of runoff which can otherwise contain contaminants.</p> <p>CP7, CP8 and CP11 all support delivery of SUDS.</p> <p>This option is considered to have a positive</p>	+	<p>Impacts considered to be the same as option 1.</p>

		impact on this objective.		
13. To make the best use of land available	0	Although SUDS can have multi-functional benefits, which can help to make the best use of land, there is no reference to achieving multiple benefits in CPP1. There is therefore no impact on this objective.	+	SUDS can be multi-functional and can therefore be considered to make efficient use of land. E.g. SUDS which have biodiversity benefits; SUDS which provide open space. Impacts are considered to be positive for this objective.
16. To improve health and well-being, and reduce inequalities in health	+	This option should help to reduce surface water flooding. This will have a direct impact on health, and therefore will have a positive impact on this objective.	+	Impacts considered to be the same as option 1.

### Summary

#### Option 1 – no policy

- This option was found to have potential for significant positive impacts for objectives for improving water quality and reducing flood risk through the requirements of CPP1 policies regarding implementing SUDS and mitigating against flood risk.
- This option was found to have potential for positive impacts for biodiversity, through the potential for SUDS to have benefits for biodiversity; climate change adaptation, through requirements to reduce flood risk; soil, through the prevention of soil pollution; and health, through the reduction in flood risk.

#### Option 2 – detailed DM policy + SPD

- This option was also found to have potential for significant positive impacts for objectives for biodiversity, through the potential for this option to promote multi-functional SUDS that have wider biodiversity benefits; open space, through the potential for this option to promote multi-functional SUDS that can provide open space functions; water quality, through the role SUDS play in prevention water pollution; flood risk, through the role SUDS play in reducing surface water run-off; and climate change adaptation, through the reduction in flood risk but also through the potential for SUDS to help with temperature regulation.
- This option was found to have potential for positive impacts for objectives soil quality, through the prevention of soil pollution; making the best use of land through the potential to promote SUDS that have multi-functional benefits; and health, through the reduction in flood risk.

### Overall Summary

- Both impacts resulted in fairly similar results across key objectives for this topic area, with both likely to have significant positive impacts on the objectives for water quality and flood risk. However, option 2 may have greater potential for more significant positive impact than option 1 for these objectives, as it provides the opportunity to add information on local circumstances which could result in more effective water management.

- Option 2 resulted in more significant positive impacts than option 1 on some other environmental objectives and provides the opportunity to achieve wider sustainability benefits, e.g. for biodiversity and open space.
- Option 2 may also have a positive impact on some objectives where option 1 was found to have no impact such as making the best use of land.
- Option 2 is the preferred option, however there is some concern that option 2 includes production of an SPD, which cannot set policy and can only provide guidance. The SA recommends that the policy itself should include the majority of information to ensure that positive effects are maximised.

### CPP2 Options Appraisal: DM43 Energy Efficiency and Renewables Options

- Option 1: No Energy Efficiency and Renewables policy within development management policy framework to guide application of energy policy for development. Instead rely on NPPF and City Plan Part One policies (CP8 Sustainable Buildings).
- Option 2: Development management policy on Energy Efficiency and Renewables to guide application of energy policy for development.

### Assumptions

- Assume that renewables technologies could come forward with both options.
- Assume that option 2 will not repeat anything of a strategic nature that is included in CPP1.
- Renewables technologies could include various forms of technologies such as wind turbines and solar PV, although it is noted that the predominant form in Brighton & Hove is solar PV.

### Appraisal

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	Certain types of renewables technologies, could have impacts on biodiversity. CPP1 policy CP10 sets the strategic approach to biodiversity and CP8 requires development to enhance biodiversity. Policy requirements should ensure impacts of renewables are positive for this objective.	+?	Although CPP1 sets the strategic policy in relation to this objective, this option has the potential to ensure greater consideration of ecological issues that are specific to energy infrastructure. Impacts should be positive although impacts not considered to be any more significant than option 1.
3. To protect, conserve and enhance	+	Any development, including renewables infrastructure could have landscape and visual	+?	This option may provide guidance as to where certain type of renewables infrastructure could be supported. Certain types of

the South Downs National Park and its setting, and improve sustainable access to it		impacts including on the SDNP depending on the type and location. CPP1 policy SA5 sets the strategic approach to protecting the setting of the SDNP. Policy requirements should ensure impacts of energy infrastructure are positive for this objective.		renewables infrastructure may have adverse visual effects and may not be appropriate in certain locations, and the policy could provide guidance on this.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	Any development, including renewables infrastructure, could have impacts on the historic built environment, including visual impacts depending on the type and the location. CPP1 policy CP15 sets the strategic approach to protecting heritage assets. It includes point 2 which considers how development proposals that contribute towards climate change mitigation will be assessed in relation to the potential for harm to heritage assets. Policy requirements should ensure impacts of renewables infrastructure are positive for this objective.	+?	This option may provide guidance as to where certain type of renewables infrastructure could be supported. Certain types of renewables infrastructure may have adverse visual effects and may not be appropriate in certain locations, and the policy could provide guidance on this.
9. To reduce emissions of greenhouse gases that cause climate change	+	NPPF refers to increasing the supply of renewable and low carbon energy. CP8 requires new build residential to achieve 19% improvement in CO2 emissions over building regulations and non-residential (A1) over 150sqm or other uses over 236 to achieve either BREEAM very good or excellent. This means that residential development delivered through change of use or conversions, and other development less than the above amounts do not have to meet any standards, and although CP8 has other requirements, these cannot be measured as such.	++	As described under option 1, a significant proportion of development does not have to deliver any improvements in CO2 reductions over building regulations requirements. This option would enable the policy requirements of CP8 to be applied to all types of development, including residential conversions and changes of use, which make up a high proportion of residential development and include a requirement for smaller size non-residential developments. This has potential to have significant positive impacts on this objective as should result in a greater reduction in CO2 emissions. This option will also provide clarity over locations where renewables may be more suitable or where they may be

		<p>Over the last two years, whilst the CPP1 CP8 requirements have been implemented, 38% (15/16) and 48% (16/17) of all residential completions have been through conversions or changes or use.</p> <p>Although CP8 requirements ensure that new build residential achieves this CO2 reduction, as well as non-residential developments over a certain size, these percentages demonstrate that a significant amount of development is not achieving this improvement. Impacts are still considered to be positive overall.</p>		<p>expected, which would provide clarity for developers and may help to bring forward renewable technologies.</p>
16. To improve health and well-being, and reduce inequalities in health	+	<p>Fuel poverty is higher in Brighton &amp; Hove than the regional and national average.</p> <p>Having an energy efficient home has direct health benefits for all, and particularly for those who have lower incomes and who may suffer from fuel poverty.</p> <p>Energy efficient homes have the potential to reduce fuel poverty, although this would obviously be dependent on whether people who are suffering from the fuel poverty occupy the house.</p> <p>This option would result in delivery of new-build homes that achieve a certain standard of efficiency and are therefore cheaper to run than older homes, although would not apply to any new homes created from the conversion or changes of use. Impacts are still considered to be positive for health.</p>	++	<p>This option would ensure that all types and scales of development achieve a certain standard of energy efficiency/CO2 emissions, rather than just new build homes or other developments over a certain size.</p> <p>This would ensure that all new homes, including those that are delivered through conversions and changes of use, help to address the risks of fuel poverty, reduce health inequalities and support health.</p>
18. To increase equality and social inclusion	+	<p>People who have lower incomes, which can include those with protected characteristics, e.g. older people, may be more vulnerable to</p>	++	<p>This policy would ensure that all types and scales of development achieve a certain standard of energy efficiency/CO2 emissions, rather than just new build homes or</p>

		<p>the risks of fuel poverty. Energy efficient homes have the potential to reduce fuel poverty, although this would obviously be dependent on whether people who are suffering from the fuel poverty occupy the house.</p> <p>This option would result in delivery of new-build homes that achieve a certain standard of efficiency and are therefore cheaper to run than older homes, although would not apply to any new homes created from the conversion or changes of use. Impacts are still considered to be positive for this objective.</p>		<p>other developments over a certain size. This would ensure that all new homes, including those that are delivered through conversions and changes of use, help to address the risks of fuel poverty, reduce health inequalities and could support people with protected characteristics if they occupy the house.</p>
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## Summary

### Option 1 – no policy

- This option was found to have potential for positive impacts for objective for reducing greenhouse gas emissions, with the various requirements of CP8 which should improve energy efficiency and reduce emissions in certain types and scales of development.
- This option was found to have potential for positive impacts for objectives for biodiversity, through requirements for development to enhance biodiversity; SDNP , for requirements for development to protect the setting of the SDNP; the historic built environment, through requirements for development to protect heritage assets and the consideration of the benefits of climate change mitigation development against the harm towards heritage assets; and health and deprivation, through the health benefits that greater levels of energy efficiency can have in relation to potentially addressing fuel poverty and health inequalities.

### Option 2 – detailed DM policy

- This option was also found to have potential for significant positive impacts for the objective for reducing greenhouse gas emissions. Crucially, this option would ensure that all types and scale of development, and not just new build, would have to meet certain standards in terms of CO2 emissions and should lead to greater reductions in CO2 emissions from the energy consumption. This option may also actively encourage incorporation of renewables.
- This option was also found to have potential for significant positive impacts for objectives for health and deprivation, through the health benefits that energy efficient homes have and the potential to address fuel poverty and health inequalities, and would be greater than option 1 as would be applicable to all types of residential development.

- This option was found to have potential for positive uncertain impacts for objectives for biodiversity, the SDNP, and the historic built environment as this option could have the potential to include greater consideration of how renewables infrastructure could affect these issues.

### Overall summary

- Option 2 had greater potential for more significant positive impact on the key objective for this policy area, climate change mitigation, as this option would ensure that all types and scales of development, and not just new build or development over a certain size, have to achieve a certain reduction in CO2 emissions, and may also encourage installation of renewables in certain locations. This option would also have more significant implications for addressing fuel poverty and health inequalities through greater delivery of homes with a higher energy efficiency.

### CPP2 Options Appraisal: DM45 Community Energy

- Option 1) No community energy policy within development management policy framework to guide application of energy policy for development instead rely on NPPF and City Plan Part One policies (CP8 Sustainable Buildings)
- Option 2) Development management policy on Community Energy to guide application of energy policy for development.

### Assumptions

- Assume that community energy will come forward with both options
- Community energy will result in development of various forms of energy infrastructure e.g. wind turbines, solar photovoltaics etc

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	Any development, including community energy infrastructure, could have impacts on biodiversity, CPP1 policy CP10 sets the strategic approach to biodiversity and CP8 requires development to enhance biodiversity. Policy requirements should ensure impacts of community energy development are positive for this objective.	+	Although CPP1 sets the strategic policy in relation to this objective, this option has the potential to ensure greater consideration of ecological issues that are specific to energy infrastructure. Impacts should be positive although impacts not considered to be any more significant than option 1.
3. To protect, conserve and enhance	+	Any development, including community energy infrastructure, could have landscape and visual	+	Although CPP1 sets the strategic policy in relation to this objective, this option has the potential to ensure greater

the South Downs National Park and its setting, and improve sustainable access to it		impacts including impacts on the SDNP depending on the type and location. CPP1 policy SA5 sets the strategic approach to protecting the setting of the SDNP. Policy requirements should ensure impacts of community energy development are positive for this objective.		consideration of landscape/visual issues that could arise from energy infrastructure. Impacts should be positive although impacts not considered to be any more significant than option 1.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	Any development, including community energy infrastructure, could have impacts on the historic built environment, including visual impacts depending on the type and the location. CPP1 policy CP15 sets the strategic approach to protecting heritage assets. It includes point 2 which considers how development proposals that contribute towards climate change mitigation will be assessed in relation to the potential for harm to heritage assets. Policy requirements should ensure impacts of community energy development are positive for this objective.	+	Although CPP1 sets the strategic policy in relation to this objective, this option has the potential to ensure greater consideration of visual/heritage issues that could arise from energy infrastructure. Impacts should be positive although impacts not considered to be any more significant than option 1.
6. To improve air and noise quality	-	Certain types of community energy infrastructure could have noise impacts which may affect amenity. CP18 sets the strategic approach to promoting healthier lifestyles but does not include any reference to noise impacts from development. Impacts could be adverse.	+	This option has the potential to ensure greater consideration of noise impacts that may arise from certain types of energy infrastructure. Impacts could be positive depending on policy criteria.
9. To reduce emissions of greenhouse gases that cause climate change	++	NPPF refers to increasing the supply of renewable and low carbon energy including from community energy. CP8 requires development to achieve certain standards in energy performance and has various other criteria including addressing climate change	++	Delivery of community energy would result in a reduction in carbon emissions from energy sources and contribute towards mitigating against climate change. A specific policy on this subject would highlight the potential for community energy and may help to bring forward applications for community energy.



		mitigation, contributing to reducing greenhouse gas emissions, and facilitating renewable energy technology. Policy requirements should result in a significant positive impact on this objective.		This option should result in a significant positive impact on this objective.
12. To minimise and sustainably manage waste	+	Delivery of community energy projects could include delivery of energy infrastructure that re-use waste heat. This could therefore have a positive impact on this objective.	+	Impacts the same as option 1.
16. To improve health and well-being, and reduce inequalities in health	+	Having a warm, energy efficient home has direct health benefits for all. Fuel poverty is higher in Brighton & Hove than the regional and national average. Community energy has the potential to address fuel poverty, although this would be dependent on whether the fuel poor benefit from the community energy scheme. Impacts are positive for health.	+	Impacts the same as option 1.
18. To increase equality and social inclusion	+?	See objective 16. This option could result in an improvement in health-based deprivation.	+?	Impacts the same as option 1.

### Summary

#### Option 1 – no policy

- This option was found to have potential for significant positive impacts for objective for reducing greenhouse gas emissions, with the various requirements of CP8 which should improve energy efficiency and reduce emissions.
- This option was found to have potential for positive impacts for objectives for biodiversity, through requirements for development to enhance biodiversity; SDNP , for requirements for development to protect the setting of the SDNP; the historic built environment, through requirements for development to protect heritage assets and the consideration of the benefits of climate change mitigation development against the harm towards heritage assets; waste, through the potential for community energy to reuse waste heat; and health and deprivation, through the health benefits that energy efficient homes can have and the potential to address fuel poverty and health inequalities.
- This option had potential to have adverse impacts on air/noise quality. Community energy schemes could have noise impacts, and this option does not include consideration of noise impacts from development.

## Option 2 – detailed DM policy

- There were no adverse impacts resulting from this option
- This option was also found to have potential for significant positive impacts for the objective for reducing greenhouse gas emissions. Community energy would result in a reduction in carbon emissions and a policy on this topic may help to bring forward applications.
- This option was found to have potential for positive impacts for objectives for biodiversity, the SDNP, the historic built environment, and air/noise quality as this option has the potential to include greater consideration of how energy infrastructure could affect these issues.
- This option was also found to have potential for positive impacts for objectives for waste, through the potential for community energy to reuse waste heat; and health and deprivation, through the health benefits that warm homes has and the potential to reduce fuel poverty.

## Overall summary

- Both options resulted in fairly similar results, with both likely to have significant positive impacts on the key objective for this policy area: reduction in greenhouse gases. Option 2 may have greater potential for more significant positive impact on this objective, as a policy on this topic area could help to bring forward applications for this type of development.
- Option 2 may have greater potential for a positive impact on some of the site-based objectives than option 1, as a detailed policy could include greater consideration of site-based issues, e.g. biodiversity and heritage.
- Option 2 resulted in a more beneficial result for air/noise quality as this option could result in greater consideration of noise amenity issues.

## CPP2 Options Appraisal – DM46 Communal & District Heating

### Options

- Option 1) No policy framework to manage standards for Communal and District Heating in the City Plan (CPP1/NPPF)
- Option 2) Criteria based policy to manage standards in Communal and District Heating in the City Plan
- Option 3) Develop supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (SPD only)
- Option 4) Develop policies in the city plan and supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (CPP2 + SPD)

### Appraisal

SA Objective	Option	Summary of Effects	Option	Summary of Effects	Option	Summary of Effects	Option	Summary of Effects
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	<b>1</b>		<b>2</b>		<b>3</b>		<b>n 4</b>	
6. To improve air and noise quality	-?	<p>This option should result in CHP installations. All combustion technologies release various gaseous emissions, including nitrous oxides which can have air quality impacts.</p> <p>Installing a CHP replaces emissions from two locations (boilers and power stations). In some situations overall emissions of air pollutants may fall, but local emissions may rise. This will also be dependent on the type of fuel used for the CHP. This could have implications for the AQMA.</p> <p>Overall impacts are also uncertain and will depend on where and what is implemented.</p>	-?	Impacts potentially adverse and uncertain. See option 1.	-?	Impacts potentially adverse and uncertain. See option 1.	-?	Impacts potentially adverse and uncertain. See option 1.
9. To reduce	+	NPPF para 96	++	This option should	+	Impacts considered to	++?	Impacts considered to be

<p>emissions of greenhouse gases that cause climate change</p>		<p>requires new development to comply with Local Plan requirements for decentralised energy, unless unfeasible/not viable. Some CPP1 Development Area policies encourage development to consider decentralised energy and heat networks, including future connections. CPP1 CP8 2.d expects development to connect, contributes towards or incorporate provision to enable connection to decentralised energy. Overall, impacts of this option should be positive towards this objective as should result in development of decentralised energy</p>		<p>provide clarity to developers, may help to bring forward suitable and acceptable and better quality CHP development, and should help to ensure future connectivity of heat networks, thus supporting a reduction in carbon emissions. Impacts should be more significant than option 1.</p>		<p>be the same as described under option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 (rely on NPPF and CPP1 only).</p>		<p>similar to option 2, however becoming more uncertain as it is not known what detail would be included within the policy text and what would be included within the SPD. As an SPD carries less weight, if this option is chosen, the main requirements should be contained within the policy, with only technical details left to the SPD to ensure a significant positive impact is obtained.</p>
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		networks thus supporting a reduction in greenhouse gas emissions.						
12. To minimise and sustainably manage waste	+	CHP installations use waste heat to produce power and thus save energy. Although waste heat is not a type of waste in the traditional physical sense, nor one that needs to be managed as such, it is a resource that can be utilised and reused for other purposes. This option is therefore considered to have an indirect positive effect on this objective.	+	Impacts considered to be the same as option 1.	+	Impacts considered to be the same as option 1.	+	Impacts considered to be the same as option 1.
16. To improve health and well-being, and reduce inequalities in health	-/+?	The percentage of households in fuel poverty is higher in BH than the England and regional averages. Fuel poverty contributes towards excess winter deaths.	+	This option would result in policy to manage standards in communal and district heating. This includes asking developers to commit to a heat customer protection scheme which protects customers with	-/+?	Impacts considered to be the same as option 1.	+?	Impacts considered to be similar to option 2, however becoming more uncertain as it is not known what detail would be included within the policy text and what would be included within the SPD. As an SPD carries less weight, if this option is

		<p>Although this option will still result in some delivery of CHP, having positive impacts for health through the potential to reduce fuel poverty, there would be no policy guidance on managing standards. This may impact upon the quality of the scheme delivered and may result in schemes that can set their own pricing which may impact upon levels of fuel poverty. Impacts considered to be mixed and uncertain.</p>		<p>regards to price and therefore may help to reduce risk of fuel poverty.</p>				<p>chosen, the main requirements should be contained within the policy, with only technical details left to the SPD to ensure a significant positive impact is obtained.</p>
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**Summary**

**Option 1**

- This option was found to have positive effects for objective 9: reducing greenhouse gases, as will result in delivery of CHP; and objective 12: minimise and manage waste, as will make use of waste heat.
- This option was found to have mixed positive and negative impacts on health, as although delivery of CHP would have positive impacts for helping to reduce the risk of fuel poverty, the lack of detailed policy on standards may result in heating schemes that can set their own pricing with no protection for customers, which could result in an increase in fuel poverty.

- This option was found to have adverse and uncertain impacts for objective 6: air quality. CHP can have localised air quality impacts and the level of impact will depend on the type of fuel used and whether located in an area that has air quality issues.

### **Option 2**

- This option was found to have significantly positive effects for objective 9: reducing greenhouse gases, as this option will result in delivery of CHP and provides greater clarity to developers which may help to bring forward CHP.
- This option was found to have positive effects for objective 12: minimise and manage waste, as will make use of waste heat; and objective 16: health, as this option should result in delivery of CHP which meets certain quality standards, including price protection and this can help to reduce the risk of fuel poverty.
- As with option 1, this option was also found to have adverse and uncertain impacts for objective 6: air quality.

### **Option 3**

- Impacts were found to be the same as Option 1, as although an SPD could provide greater guidance on matters, it cannot set policy and therefore the effects are considered to be the same as those described under option 1.

### **Option 4**

- Impacts were found to be similar to option 2, however there was more uncertainty due to it not being known which elements would be contained with actual CPP2 policy and which elements would be contained with supplementary guidance which carries more weight.

### **Overall summary and preferred option**

- The key objectives for this policy area is objective 9, to reduce the emissions of greenhouse gases, and objective 16, to improve health. The impacts arising from option 2 for both these objectives were either more significantly positive than other options, or had less potential for adverse or uncertain impacts than other options.
- Option 2 should provide policy which provides clarity to developers, potentially helping to bring forward CHP, will also ensure that certain standards of quality are achieved and will ensure that customers are protected from high heat prices, helping to reduce the risk of fuel poverty.
- There may be air quality impacts arising from this policy, which would need to be addressed by policy on pollution control.
- Option 2 is the preferred approach.

## Site Allocations

### CPP2 Options Appraisal: SA7 – Benfield Valley

See options assessment for H2 Urban Fringe Housing Sites

### CPP2 Options Appraisal: SSS1-SSS4 Strategic Mixed Use Sites

#### Options Appraisal

- Option 1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)
- Option 2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites
- Option 3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site

#### Assumptions

- Location of sites associated with option 1 are unknown and could be anywhere across the city.
- Assume all strategic mixed use sites in options 2 and 3 are on the same brownfield sites within the built up area.
- Assume that options 2 and 3 will not repeat any policy of a strategic nature that is included in CPP1
- This assessment does not consider the general indirect developmental impacts, e.g. potential for increase in resource consumption.
- Site based impacts for all options are fairly uncertain as the location of sites is unknown at this stage, with greater uncertainty with option 1.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	?	This option provides no guidance as to where strategic mixed use developments would be supported. This could result in sites coming forward in unsuitable or sensitive locations, e.g. those with ecological designations. However if suitable brownfield sites came forward then it could result in net gains. Effects are uncertain and would	+	Assuming that this option would allocate brownfield sites within the built up area, this option could have indirect positive impacts on this objective as may help to avoid more sensitive sites. Development of sites within the urban area may also provide opportunities to secure net gains for biodiversity. Impacts could be positive.	+	Impacts the same as option 2. Additionally, this option could set out any site specific considerations that need to be addressed, including those relating to biodiversity.



		depend on the site coming forward.				
2. To protect and improve open space and green infrastructure and improve sustainable access to it	?	This option provides no guidance as to where strategic mixed use development would be supported. This could result in sites coming forward in unsuitable or sensitive locations, e.g. those with open space designations. Effects are uncertain and would depend on the site coming forward.	+	Assuming that this option would allocate brownfield sites within the built up area, this option could have indirect positive impacts on this objective as may help to avoid development of open space. Impacts could be positive.	+	Impacts the same as option 2.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	?	This option provides no guidance as to where strategic mixed use development would be supported. This could result in sites coming forward in unsuitable or sensitive locations, e.g. those with landscape sensitivities. Effects are considered uncertain and would depend on the site coming forward.	+	Assuming that this option would allocate brownfield sites within the built up area, this option could have indirect positive impacts on this objective as may help to avoid development on sites which may have landscape sensitivities. Impacts could be positive.	+	Impacts the same as option 2.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	?	This option provides no guidance as to where strategic mixed use development would be supported and could result in sites coming forward in unsuitable locations, including those which potentially have adverse heritage impacts. However, could result in positive impacts if development brought the asset back into use or otherwise improved it. Effects are considered uncertain and would depend on the site coming	?	Impacts uncertain. Allocation of brownfield sites for SMU could include those within heritage assets, which could result in positive effects as described in option 1, although again could also have adverse effects.	?	Impacts uncertain. Impacts the same as options 1 and 2. Additionally, this option could set out any site specific considerations that need to be addressed, including those relating to heritage and may have greater opportunity for positive effect.

		forward.				
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	This option provides no guidance as to where or what type of strategic mixed use development would be supported and development could therefore come forward in less accessible locations, potentially having adverse impacts. Mixed use developments can help reduce the need to travel, however it is uncertain whether a mix of uses would be actually be delivered with this option, as this option may result in delivery of higher value uses only, such as housing.	+	This option assumes that sites will be within the urban area where they can be accessed by sustainable transport. In addition, this option provides more certainty that mixed use developments will be delivered, and mixed use developments can help reduce the need to travel.	+	Impacts the same as option 2. Additionally, this option could set out any site specific considerations that need to be addressed, including those relating to transport.
6. To improve air and noise quality	-/+ ?	This option could result in development coming forward in less accessible locations, potentially impacting upon air quality, although it is recognised that air quality is generally worse in central locations where public transport accessibility is good. There is some uncertainty regarding whether mixed use developments would be delivered with this option, due to employment land values, however if they do come forward this could reduce the need to travel having air quality benefits. There could be greater risk of noise issues within mixed use	-/+?	It is uncertain what impacts this option will have on air quality. If sites are located where they can be reached by sustainable transport, these locations tend to have the worst air quality and are therefore unlikely to impact positively upon air quality, however may reduce the risk of it deteriorating elsewhere. As with option 1, mixed use developments could reduce the need to travel having air quality benefits. There could be greater risk of noise issues within mixed use developments, depending on the type of employment and other uses. Impacts are mixed and uncertain.	-/+?	Impacts the same as options 1 and 2. This option could set out any site specific considerations that need to be addressed, including those relating to air quality or noise issues.

		developments depending on the type of employment and other uses. Impacts are mixed and uncertain.				
7. To improve water quality (ecological, chemical and quantity status)	0	<p>Development may come forward on sites that are easier and less expensive to develop with this option, e.g. greenfield sites or sites that are not contaminated. Therefore this option may miss the opportunity to remediate any contaminated land, which can benefit the aquatic environment, however this would result in no impacts rather than adverse impacts.</p> <p>Although this option may result in development within a GSPZ, avoidance of GSPZ is unlikely to be a key consideration in site selection due to the extensive nature of GSPZ across the city.</p> <p>Overall effects are considered neutral.</p> <p>Any developmental impacts relating to water consumption would be addressed through CP8 Sustainable Buildings.</p>	+	<p>This option assumes that sites will be located on previously developed sites. This could include those which require remediation which would have positive impacts for this objective.</p> <p>It is considered unlikely that this option would avoid development within a GSPZ due to the fact the majority of the city overlies the aquifer and is within various GSPZs, however if this option did avoid GSPZ then this would further support the protection of groundwater.</p> <p>Development impacts relating to water consumption addressed by CP8 Sustainable Buildings.</p>	+	Impacts the same as option 2. In addition, this option could set out any site specific considerations, e.g. requirements relating to the specific type of Groundwater Source Protection Zone or site specific SUDS.
8. To reduce the risk from all sources of flooding to and from development	?	This option provides no guidance as to where SMU development would be supported and lets the market decide. However, it is considered highly unlikely that	+	This option should avoid development on greenfield sites, and therefore reduce the likelihood of increasing flood risk associated with a change in urban form.	+	Impacts similar to option 2, although additionally, this option could set out any site specific considerations, e.g. requirements relating to flood risk.

		<p>SMU development would come forward in locations at risk of tidal, flooding.</p> <p>Although this option could result in development coming forward in areas of ground/surface water flood risk, avoidance of areas of GW/SW flood risk is unlikely to be a key consideration in site selection due to the fact that many areas of the city are at risk of flooding.</p> <p>However, sites coming forward on greenfield sites that result in a change in form from a natural to more urbanised form can increase surface water flood risk, therefore resulting in adverse impacts.</p> <p>Overall effects are considered uncertain and would depend on the site coming forward.</p>		<p>It is assumed that SMUs would be directed to areas with low risk of tidal flooding having positive impacts on this objective.</p> <p>This option could have further beneficial impacts by reducing the risk of surface/groundwater flooding by avoiding areas at high risk, however as many areas of the city are at risk of flooding, and as this could be addressed through on site mitigation, this is unlikely to be a key consideration when choosing a site.</p>		
11. To improve soil quality	0	<p>Development may come forward on sites that are easier and less expensive to develop with this option, e.g. greenfield sites or sites that are not contaminated. Therefore this option may miss the opportunity to remediate any contaminated land, however this would result in no impacts rather</p>	+	<p>This option assumes that sites will be located on previously developed sites. If this included those which required remediation which would have positive impacts for this objective, otherwise would have a neutral effect.</p>	+	<p>Impacts the same as option 2.</p>

		than adverse impacts.				
13. To make the best use of land available	-	Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants, which may deter applications on sites where applications would be welcomed, e.g. those that are vacant or under-used. This option may result in sites coming forward for mixed uses which may not be considered suitable for that site, or may result in single uses coming forward, e.g. housing due to land values, resulting in an imbalance of uses across the city, and may not make the best use of the land. In addition, this option does not allow for any new strategic sites, which have been identified or come forward for redevelopment since CPP1 was adopted, to be allocated which could waste the land resources being made available. Impacts could be adverse.	+	This option could have positive impacts on this objective as could allocate vacant or under-used sites and make better use of these sites. In addition, this option allows for strategic sites which have come forward since CPP1 was prepared/adopted to be allocated. Allocating sites provides greater certainty and may help bring forward applications potentially reducing vacancy and will help to make the best use of land. However this option may not provide the opportunity to set out detailed site specific requirements, e.g. amount of employment floorspace, types of employment floorspace or other uses on the different sites. Overall, impacts should be positive.	++	Similarly to option 2, this option could allocate vacant or under-used sites and make better use of these sites and allows for any new strategic sites to be allocated which is a good use of land resources. Additionally, this option would provide the opportunity to direct certain types of uses to particular sites where that use is needed, may help to achieve a better balance across the city and help to meet various citywide needs. Impacts could be significantly positive.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants, which may deter applications. However, based on the fact that housing value and need will continue to be high in the city, this option is still likely to	+	This option provides certainty to developers, which should help bring applications forward. This option should result in delivery of housing as part of mixed use schemes, although does not provide the opportunity to require a certain amount of housing on different	++	This option also provides certainty to developers, which should help bring applications forward. This option would provide the opportunity to set out the amount of housing required to be delivered on each site, and potentially the type, and is considered to have potential for significant positive impacts.

		result in housing delivery including affordable housing.		sites.		
15. To improve the range, quality and accessibility of services and facilities.	-	This option is unlikely to result in delivery of other uses which are less profitable than housing, e.g. community/health facilities. Impacts considered to be adverse.	+	This option may secure other uses as part of mixed use schemes, e.g. community/health facilities. However does not provide the opportunity to specify quantum, nor site specific requirements to meet local needs. Impacts still likely to be positive.	++	This option may also secure other uses as part of mixed use schemes, and also provides the opportunity to require certain uses as required for that site/area. Impacts could be significant.
16. To improve health and well-being, and reduce inequalities in health	+	Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants. However, housing led development is still likely to come forward without any allocations, due to need and value of housing, which is one of the wider determinants of health, having positive impacts on this objective.	+	This option is likely to deliver both employment and housing, both of which are wider determinants of health.	++	This option is likely to deliver both employment and housing, both of which are wider determinants of health. This option may also result in delivery of other uses and increase access to health, as provides the opportunity to include any site specific infrastructure requirements e.g. health and community uses. Impacts could be significantly positive.
17. To improve community safety, and reduce crime and fear of crime	-	Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants. This may deter applications on sites where applications would be welcomed, e.g. those that are vacant or under-used. This could have indirect adverse impacts on this objective due to link between vacancy and fear or crime.	+	Mixed uses could increase the opportunity for passive and natural surveillance at different times of the day, which could have positive impacts for this objective. In addition, mixed use sites are more likely to come forward due to the housing element, may reduce the risk of sites remaining vacant, which can help reduce the fear of crime or opportunities for crime around these sites.	+	Impacts the same as option 2.

<p>19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>	<p>--</p>	<p>Monitoring suggests that there has been a trend of net loss in employment floorspace over the last 5 years. This could be due to lack of employment land being offered in the city, although is also likely to be due to market forces, such as high housing land values, and also permitted development rights that allow change of use to residential. This option may not result in delivery of other uses which are less profitable than housing, e.g. employment land or other uses of essential to the local economy such as retail and employment generating uses. Impacts considered to be significantly adverse.</p>	<p>+</p>	<p>This option is proactive and positively addresses the need to deliver employment land, through allocating sites for mixed use schemes. Other uses are more likely to come forward as part of mixed use schemes as they may enable development of less profitable uses. However this option may not provide the opportunity to set out detailed site specific requirements, e.g. amount of employment floorspace, types of employment floorspace or other uses on the different sites. Impacts likely to be positive.</p>	<p>++</p>	<p>This option is also proactive and positively addresses the need to deliver employment land, through allocating sites for mixed use schemes. Other uses are more likely to come forward as part of mixed use schemes as they may enable development of less profitable uses. This option would provide the opportunity to clearly set out the amount of employment floorspace, types of employment uses and potentially other uses required to be delivered. Impacts could be significantly positive.</p>
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**Summary**

**Option 1 – no site allocations for strategic mixed uses. Rely on market to decide**

- This option was found to have potential for positive impacts on the objectives for housing and health. This option would allow any uses to come forward on any site, which would most likely result in housing due to high land values and need for housing, with housing being one of the wider determinants of health.
- This option was found to have potential for adverse impacts on the objective for travel, best use of land, access to services, community safety and significant adverse impacts for economic development. This option could result in development in inaccessible locations; could result in an imbalance of uses, uses in the wrong location or may not deliver lower value uses where needed, which would waste land resources that are available or potentially result in vacant sites not making the best use of land, indirectly having community safety implications and would not increase access; and may not result in any delivery of employment floorspace due to this having a lower land value, which could significantly constrain the economy.

- This option was found to have potential for mixed impacts on the objectives for air/noise quality. Mixed use schemes can help reduce the need to travel potentially benefiting air quality, but can also result in noise amenity impacts. Impacts on air quality may also depend upon where sites are located, e.g. those that are more accessible may have air quality benefits and are also fairly uncertain.
- This option was found to have potential for uncertain impacts for most of the site based objectives due to the unknown location of sites including biodiversity, open space, heritage, SDNP and flood risk. This option could lead to development coming forward on sites that have ecological, landscape or heritage sensitivities, on open space, or in areas where flood risk would be increased. Any risk of adverse impacts should be mitigated by CPP1 policies.
- This option was found to have no impacts on water or soil quality, as this option may miss the opportunity to promote development of contaminated sites.

### **Option 2 – criteria based policy with schedule of allocations**

- This option was found to have potential for positive impacts on the objective for biodiversity, open space, SDNP, travel, water quality, flood risk, soil quality, best use of land, housing, access to services, health, community safety and economic development. This option may prevent development from coming forward in sensitive or inappropriate locations, such as open spaces or those with landscape sensitivities, those with higher flood risk, and may provide the opportunity to achieve net gains in biodiversity. Redevelopment of brownfield sites could result in positive remediation, benefiting water and soil quality. Mixed use developments can help reduce the need to travel. Through allocations, this option should help to bring forward sites and potentially make better use of sites, will help increase housing delivery as part of mixed-use schemes, may secure other uses helping to increase access to services, may help to reduce the fear of crime/crime by bringing forward vacant sites as well as providing opportunities for passive surveillance, and should help to increase employment land having economic benefits. This option would also help deliver some of the wider determinants of health. Impacts for site-based objectives also have a degree of uncertainty.
- This option was found to have potential for mixed impacts on the objectives for air/noise quality. Mixed use schemes can help reduce the need to travel potentially benefiting air quality, but can also result in noise amenity impacts. Impacts on air quality may also depend upon where sites are located, e.g. those that are more accessible may have air quality benefits and are also fairly uncertain.
- This option was found to have potential for uncertain impacts on the objective for heritage as it is unknown whether development could come forward that would benefit heritage assets, e.g. through reducing risk of vacancy, or may otherwise impact upon them.

### **Option 3 – detailed policy for each strategic mixed use allocation**

- This option was found to have potential for significant positive impacts on the objectives for best use of land, housing, access to services, health and economic development. This option could help bring vacant or under-used sites forward and also direct certain uses to sites where needed in the city, resulting in a better balance. This option will help increase housing delivery as part of mixed use schemes and could also result in other uses needed in that location, helping to increase access to services. This option should also help to increase employment land supply, having economic benefits and would also provide the opportunity to include any site by site requirements relating to types or employment uses. Delivery of various uses would help to deliver the wider determinants of health.



- This option was found to have potential for positive impacts on the objective for biodiversity, open space, SDNP, travel, flood risk, water and soil quality, and community safety. This option may prevent development from coming forward in sensitive or inappropriate locations, such as open spaces or those with landscape sensitivities, those with higher flood risk, and may provide the opportunity to achieve net gains in biodiversity. Redevelopment of brownfield sites could result in positive remediation, benefiting water and soil quality. This option also provides the opportunity to secure any site specific considerations relating to these issues. Mixed use developments can help reduce the need to travel, and this option also provides the opportunity to include site specific transport considerations; may help to bring forward vacant sites and provides the opportunity for passive surveillance and footfall which can help reduce the fear of crime. Impacts for site-based objectives also have a degree of uncertainty.
- This option was found to have potential for mixed impacts on the objective for air/noise quality. Mixed use schemes can help reduce the need to travel potentially benefiting air quality, but can also result in noise amenity impacts. Impacts on air quality may also depend upon where sites are located, e.g. those that are more accessible may have air quality benefits.
- This option was found to have potential for uncertain impacts on the objective for heritage as it is unknown whether development could come forward that would benefit heritage assets, e.g. through reducing risk of vacancy, or may otherwise impact upon them, however this option would provide the opportunity to include site specific considerations if applicable.

### **Preferred Option**

- Option 3 has the greatest potential for significant positive impact against the widest range of objectives, including making the best use of land, housing and economic development.
- Although the results for options 2 and 3 were fairly similar and had positive effects across the same sustainability objectives, overall option 3 had more potential for significant positive impact against these objectives when compared with option 2, including making the best use of land, providing housing, access, health and economic development. In particular, the key benefits of option 3 over other options is that it provides the opportunity to address any site specific considerations as well as set out more specific land use requirements and should therefore result in a better balance of uses where needed across the city.
- There was more uncertainty with option 1, particularly for the site-based objectives due to the uncertainty with regards to where development may come forward, and more potential for adverse impacts against some objectives including for economic development as this option may result in an imbalance of uses, and less likely to meet citywide development needs.

## CPP2 Options Appraisal: SSA6 and SSA7 Seafront Development

### Options:

- Option 1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)
- Option 2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated
- Option 3) Develop further guidance on development within the seafront through a masterplan/ SPD

SA Objective	Option 1	Summary of Effects	Option 2	Summary of Effects	Option 3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	+	There are designated wildlife sites situated in seafront locations as well as a Marine Conservation Zone. One of the priorities of SA1 is to conserve and expand designated coastal habitats and secure nature conservation enhancements to the marine and coastal environment. CP10 Biodiversity sets the strategic approach to enhancing nature conservation across the city, including the seafront. There is the risk that development in any location could adversely affect biodiversity, however overall impacts should be positive with policy requirements providing mitigation.	++	This option could provide the opportunity to have greater consideration of site specific biodiversity issues through site allocations. As with option 1, development could adversely affect biodiversity, however overall impacts have potential for being significantly positive, although this depends on the detail and requirements included in the policy.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, and could include greater consideration of biodiversity issues, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 – e.g. rely on CPP1.
2. To protect and improve open space and green infrastructure and improve sustainable	+	The openness and offer provided by the beach as a form of open space is recognised in SA1. It forms an important part of the network of open spaces in the city. It also	+	Site allocations may provide the opportunity to improve and bring forward underutilised sections of the seafront, and could therefore	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new

access to it		includes some spaces for outdoor sports e.g. volleyball. SA1 and CP16 both recognise the importance of the open spaces of the beach and seafront, and also support sustainable access to this location. Impacts should be positive.		make better use of the space. Impacts likely to be positive.		policy and is therefore likely to result in an effect which is the same as Option 1 e.g. rely on CPP1.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	The SDNP extends down to the mean low water point in the area that is within the “East of the Marina” section of SA1. SA1 requires there to be no adverse impacts on the setting of the SDNP. Impacts should be positive.	0	It is considered unlikely that this option would include any site allocations that are situated within the section of the seafront within the SDNP, nor include further references to protecting/enhancing the SDNP as these are already addressed in existing CPP1 policy. No impacts anticipated.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 e.g rely on CPP1.
4. To protect and conserve the city’s historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	One of the priorities of SA1 is to promote high quality architecture and design which preserves and enhances the character and appearance of the Conservation Areas and historic squares and buildings that adjoin the seafront. In addition, CP15 Heritage provides the strategic approach to conserving the historic environment. Impacts should be positive. Emerging CPP2 policies on heritage assets should also add to their protection, although the content of these is currently	++	This option could provide the opportunity to include greater consideration of site specific heritage issues through site allocations. As with option 1, development could adversely affect heritage, however overall impacts have potential for being significantly positive, depending on the level of detail included in the policy regarding the historic environment.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1 e.g rely on CPP1.

		unknown. There is the risk that development in any location could adversely affect heritage assets, however overall impacts should be positive with policy requirements providing mitigation.				
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	Traffic congestion is often an issue along the seafront. One of the overall priorities of SA1 is to improve sustainable transport infrastructure along the A259 and improve access to the seafront areas. Additional locational priorities referring to improving other forms of sustainable access, including the NCN route. CP9 sets the strategy in relation to sustainable transport. There is the risk that development along the seafront could further increase unsustainable journeys. Overall impacts are considered to be mixed.	-/+	Site Allocations may provide greater certainty to developers and may help to bring forward development. This could result in further transport issues. However this option could include greater consideration of site specific transport issues through site allocations. This option could also provide the opportunity to include a reference to supporting development of the England Coastal Path which may help promote sustainable access across the seafront. Overall impacts are considered to be mixed.	-/+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
6. To improve air and noise quality	-/+	The majority of the A259 west of the Palace Pier is within the AQMA. SA1 includes a priority to improve air and noise quality across the whole seafront. There is the risk that development along the seafront could further increase	-/+	Site Allocations may provide greater certainty to developers and may help to bring forward development. This could result in further transport and air quality impacts. However this option could include	-/+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same

		journeys made having air quality impacts. Overall impacts are considered to be mixed.		greater consideration of site specific transport issues through site allocations, which may benefit air quality. Overall impacts are considered to be mixed.		as Option 1.
7. To improve water quality (ecological, chemical and quantity status)	+	SA1 includes a priority to ensure appropriate waste water treatment infrastructure. All development will be required to meet requirements of CP8 that sets certain standards for water consumption. Overall impacts should be positive.	0	It is considered unlikely that this option will provide any further detail with regards to water infrastructure as this is already provided at a strategic level by CPP1. No impacts anticipated,	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
8. To reduce the risk from all sources of flooding to and from development	+	SA1 recognises that the seafront is at risk of tidal flooding and includes a priority to maintain coastal defences. CP11 also requires development to take into account flood risk if relevant. Overall impacts should be positive.	++	This option, via site allocations may provide the opportunity for more site specific issues regarding flood risk to be addressed. Impacts could be significantly positive depending on site location and the level of detail included in the policy.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
9. To reduce emissions of greenhouse gases that cause climate change	+	SA1 includes a priority to encourage opportunities for low/zero carbon energy provision. All development will be required to meet requirements of CP8 that sets certain standards for energy consumption. Overall impacts should be positive.	0	It is considered unlikely that this option will provide any further detail with regards to energy efficiency or energy infrastructure as this is already provided at a strategic level by CPP1. No impacts anticipated.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
10. To increase the	+	SA1 recognises that the seafront is	++	This option, via site allocations,	+	Impacts considered to be the same

city's resilience and ability to adapt to climate change		at risk of tidal flooding and includes a priority to maintain coastal defences and this will help the city be more resilient to climate change. SA1 also includes a priority to improve opportunity for shelter and shade, as well as tree-planting, which will also help with climate change adaptation. Overall impacts should be positive.		may provide the opportunity for more site specific issues to be addressed. Impacts could be significantly positive depending on the level of detail included in the policy regarding the coastal defences and flood risk.		as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
11. To improve soil quality	?	SA1 does not include any references to remediating contaminated land and it is unknown whether any of the seafront sites include contaminated land. Impacts are uncertain.	?	This option may provide the opportunity for any site specific contamination issues to be addressed, however impacts are uncertain as site contamination issues are unknown.	?	Impacts considered to be the same as option 1.
13. To make the best use of land available	++	SA1 includes the King Alfred Strategic Allocation which requires a minimum of 400 dwellings as well as leisure uses. This would result in a high density development having positive impacts for this objective. SA1 also promotes the regeneration of underutilised sites along the seafront which would also make better use of existing sites.	++	Site allocations may provide greater certainty and confidence for applicants and may help to bring sites forward, helping to make better use of the land available in the city. Requirements provided within the site allocations could also consider appropriate mix of uses/densities and could therefore encourage the best use of the site. Impacts have potential to be significantly positive.	++	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
14. To provide	++	The King Alfred Strategic Allocation	0	It is considered unlikely that	0	Unlikely that an SPD will include

housing, including affordable housing, to contribute towards meeting local needs		includes 400 residential units. This should have a significant positive impact on this objective.		any further residential development will come forward along the seafront. Site allocations more likely to be for leisure/retail uses. No impacts anticipated.		further guidance relating to residential development.
15. To improve the range, quality and accessibility of services and facilities.	+	SA1 requires enhancement and improvements to the public realm, which should also help improve access. SA1 should result in improved access to the seafront for all and the various facilities located there. Impacts considered to be positive.	++	This option could result in a more diverse mix of uses, through site allocations and may also help bring forward improvements to the public realm, improving access. Impacts could be significantly positive depending on the range of uses.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
16. To improve health and well-being, and reduce inequalities in health	+	SA1 should result in positive impacts for health through improved access and the recognition of the role of the seafront for recreation, exercise and leisure purposes.	+?	Seafront development and site allocations could include those used for recreation and leisure purposes which would impact positively on health, although this is uncertain until uses are known.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
17. To improve community safety, and reduce crime and fear of crime	+	SA1 includes various priorities that would help improve safety, including road safety, as well as crime prevention, e.g. through appropriate lighting.	0	It is considered unlikely that this option will include any greater consideration or detailed measures which will reduce crime or improve safety. No impacts anticipated.	+	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.
18. To increase equality and social	0	There are no direct links with this objective.	0	There are no direct links with this objective.	0	There are no direct links with this objective.

inclusion						
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	The seafront is a key destination for residents and visitors and contains some important development sites. The various priorities set out in SA1 should help ensure the seafront remains an attractive destination, helping to support tourism and therefore contributing towards economic growth. Impacts considered to be significantly positive.	++	This option would provide a clear approach to assessing applications in this location. Site allocations may provide greater certainty and confidence for applicants and may help to bring sites forward further supporting economic growth. Impacts likely to be significantly positive.	++	Impacts considered to be the same as option 1. Although an SPD can provide additional detailed guidance on a subject, it cannot establish new policy and is therefore likely to result in an effect which is the same as Option 1.

## Summary

### Option 1 – CPP1 and emerging CPP2

- This option was found to have potential for significant positive impacts for housing, due to the King Alfred Strategic Allocation; for making the best use of land, due to the strategic allocation and also due to the potential to regenerate underutilised sites; and for economic development, through the support for regeneration of the seafront.
- This option was found to have positive impacts for a number of other objectives : biodiversity, through requirements to conserve coastal habitats; open space, through recognition of the open space offer provided by the seafront; SDNP, through requirements for there to be no adverse impacts on the setting of the SDNP; historic built environment, through preservation and enhancement of adjacent heritage assets; water quality, through the requirements for waste-water infrastructure and water efficiency requirements; flood risk and climate change adaptation, through the priority to maintain coastal defences and to take account of flood risk; greenhouse gas reduction, through encouragement of opportunities for low/zero carbon infrastructure; improving access to services and facilities through improvements to public realm; health, through ongoing improvements to the seafront and opportunities for health beneficial recreation; and community safety, through improvements to road safety and opportunities to design out crime.
- This option was found to have potential for mixed (-/+ ) impacts for the objectives for reducing the need to travel and air quality, due to the potential for development to increase journeys made, however reflecting the aspirations of the policy to improve access, as well as taking into consideration other CPP1 strategic policy.

### Option 2 – site allocations

With this option, many of the impacts have a certain degree of uncertainty as the level of detail and content of the policy is unknown. Therefore, results represent best case scenario.



- This option was found to have potential for significant positive impacts for biodiversity, historic built environment, flood risk, and climate change adaptation, as site allocations may provide the opportunity to address any relevant site specific issues. However this is dependent on the location of the sites and whether the site allocations addressed these concerns.
- This option was also found to have potential for significant positive impact for making the best use of land, as site allocations could provide the opportunity to guide the mix of uses, densities and so on, and therefore ensure the most efficient use of the site is made; improved access and delivery of facilities, as site allocations could help bring forward a range of diverse uses; and economic development, as site allocations could provide greater certainty for developers and help to bring development forward.
- This option was also found to have positive impacts for open space, as may help to make better use of under-utilised areas of open space, and health, as allocations could include uses that provide for recreation or have health benefits, although this is uncertain as the range of uses are not known.
- This option was found to have potential for mixed (-/+ ) impacts for the objectives for reducing the need to travel and air quality, due to the potential for development to increase journeys made, however reflecting the opportunity for site allocations to address site specific transport and air quality issues.
- Unlike options 1 and 3, where impacts were positive, this option was found to have no impacts on objectives for the SDNP, water quality, reducing greenhouse gas emissions, housing, and community safety. This is because CPP1 already sets the strategic policy in relation to these issues and it is considered unlikely that this option would provide any further details on the issue, nor provide any additional housing allocations.

### **Option 3 – SPD**

Impacts for this option were largely similar to option 1. This is because an SPD can only provide guidance and cannot establish new policy, therefore policy would be set by CPP1 and CPP1 policies would still apply. There would be no opportunity to provide further consideration of site specific issues with this option.

### **Summary/Preferred Option**

- All of the options should result in largely positive effects.
- Option 1 has potential for positive impacts across a wider range of objectives than option 2, however this is because option 1 sets the strategy and covers a range of issues which are unlikely to be addressed further or repeated.
- Option 2, through site allocations, has potential for more significant positive impacts than option 1 across certain site-based objectives, as site allocations may provide the opportunity to address site specific issues, e.g. biodiversity and heritage considerations. This will depend on the location of the sites.
- Site allocations may also have greater benefits for economic development, as could provide certainty for developers and may help to bring forward development. They may also provide the opportunity to make the best use of land, through requirements relating to the mix of uses and densities.
- Option 2 is considered to be the preferred approach.

## CPP2 Options Appraisal: H1 Housing allocations

### Options Appraisal

- Option 1: Do not allocate any sites for housing. Rely on market to bring forward suitable sites.
- Option 2: Allocate all sites in SHLAA that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.
- Option 3: Allocate sites in the SHLAA capable of delivering 10+ units, that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.

### Assumptions

- Assume that options 2 and 3 will not repeat any policy of a strategic nature that is included in CPP1, nor include any detailed site specific considerations for individual allocations.
- This assessment does not consider the general indirect developmental impacts of housing delivery, e.g. potential for increase in resource consumption or transport movements.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	?	This option could result in sites coming forward that are not in the SHLAA and may be less suitable for housing development, including those with ecological designations. This could include urban fringe sites where ecological impacts were assessed as being significant and insurmountable and weren't recommended for development. However if suitable brownfield sites came forward then it could result in net gains. Effects are uncertain and would depend on the site coming forward.	+	The majority of SHLAA sites are within the urban area on brownfield sites. These are unlikely to have significant effects on biodiversity and could provide the opportunity for net gains. Also included in the SHLAA are some urban fringe sites where the adverse impacts should be able to be mitigated. This option should prevent housing development on other sites which may be less suitable, e.g. due to ecological designations. Overall impacts should be positive.	+	Same as option 2.
2. To protect and improve open space	?	This option provides no guidance as to where housing development would be	-/+	The majority of SHLAA sites are within the urban area on brownfield sites	-/+	Same as option 2.

and green infrastructure and improve sustainable access to it		supported. This option could result in sites coming forward that are not in the SHLAA and may not be suitable for housing, e.g. sites with open space designations within the built up area. Effects are uncertain and would depend on the site coming forward.		and therefore this option will indirectly help to protect open spaces within the built up area. The SHLAA also includes some urban fringe sites, and therefore development on these will result in loss of open space. This option may prevent housing development from coming forward on less suitable sites, including sites of open space within the built-up area boundary. Impacts considered to be mixed.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	?	This option provides no guidance as to where housing development would be supported. This option could result in sites coming forward that are not in the SHLAA and may not be suitable for housing, e.g. sites within the setting of the SDNP that could have landscape impacts, or urban fringe sites where the landscape impacts were assessed as insurmountable and weren't recommended for development. Effects are uncertain and would depend on the site coming forward.	+	The majority of SHLAA sites are within the urban area. These are unlikely to have significant effects on landscape. Also included in the SHLAA are some urban fringe sites where the adverse impacts on landscape should be able to be mitigated. This option should prevent housing development on other sites which may be less suitable, e.g. urban fringe site with greater landscape sensitivities. Overall impacts should be positive.	+	Same as option 2.

4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	?	This option provides no guidance as to where development would be supported and could result in sites coming forward in unsuitable locations, including those which potentially have adverse heritage impacts. However, could result in positive impacts if development brought the asset back into use or otherwise improved it. Effects are considered uncertain and would depend on the site coming forward.	?	Some of the SHLAA sites contain heritage assets. If development comes forward for a site that contains a heritage asset, and that heritage asset is vacant or could be otherwise improved by development, then this option could have positive impacts. However, overall impacts are considered to be uncertain until the site and its current state are known.	?	Some of the SHLAA sites contain heritage assets. If development comes forward for a site that contains a heritage asset, and that heritage asset is vacant or could be otherwise improved by development, then this option could have positive impacts. However, overall impacts are considered to be uncertain until the site and its current state are known.
7. To improve water quality (ecological, chemical and quantity status)	0	Development may come forward on sites that are easier and less expensive to develop with this option, e.g. greenfield sites or sites that are not contaminated. Therefore this option may miss the opportunity to remediate any contaminated land, which can benefit the aquatic environment, however this would result in no impacts rather than adverse impacts.	?	The majority of sites in the SHLAA are on previously developed sites. Some sites may have potential for contamination, and any remediation would have benefits for the aquatic environment. Impacts are considered uncertain as would depend on the presence of contamination.	?	Impacts the same as option 2.
8. To reduce the risk from all sources of flooding to and from development	0	Sites could come forward in areas at greater risk of flooding with this option, however as flood risk can generally be mitigated through on site measures, and as many parts of the city have a risk of flooding, this option is not considered to have any impact on this objective that is different to other options.	0	Many areas of the city have a risk of flooding (SW/GW). Flood risk is not a criteria or consideration for inclusion the SHLAA and therefore this option is not considered to have any impact on this objective.	0	Impacts the same as option 2.
11. To improve soil	0	Development may come forward on	?	The majority of sites in the SHLAA are	?	Impacts the same as option 2.

quality		sites that are easier and less expensive to develop with this option, e.g. greenfield sites or sites that are not contaminated. Therefore this option may miss the opportunity to remediate any contaminated land, however this would result in no impacts rather than adverse impacts.		on previously developed sites. Some sites may have potential for contamination, and any remediation would have benefits for soil quality. Impacts are considered uncertain as would depend on the presence of contamination.		
13. To make the best use of land available	-	Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants which may deter applications on sites where applications would be welcomed, e.g. those that are vacant or under-used. This option may result in sites coming forward for housing which may not be considered suitable for that use and may not make the best use of the land. Impacts could be adverse.	-/+	The SHLAA includes some brownfield sites that are vacant and some that are under-used. Allocating all the sites in the SHLAA, as described by the option, provides certainty to developers and may help bring forward development on these under-used and vacant sites, having positive impacts. It also retains flexibility beyond the plan period. However this may be too prescriptive for smaller sites and removes the ability to respond to any changes in the market and for other uses to come forward on those sites. This could lead to some smaller sites remaining vacant and under-used which would have adverse impacts on this objective. Overall impacts are mixed.	+	Allocating larger sites, as described by the option, may help to bring forward development on these sites and would have positive impacts on this objective, particular if sites are currently vacant and under-used. This option would retain flexibility on smaller sites so would allow other uses to come forward on these sites and respond to changes to market conditions if needed, potentially preventing the risk of vacancy on these sites. Although this option provides less certainty for applicants on smaller sites, housing could still come forward on these smaller sites under this option. Overall impacts are positive.
14. To provide housing, including affordable housing, to contribute	-/+	This option retains flexibility, which could help bring forward applications. However provides no certainty over where housing would be supported	++	This option provides greater clarity for developers over where housing applications will be supported in principal. This should significantly	+	This option provides greater clarity for developers over where applications will be supported in principal. This

towards meeting local needs		and this may deter applications and may jeopardise housing delivery. Impacts are mixed.		contribute towards this objective and is likely to increase housing delivery.		should help contribute towards this objective, although may result in other uses coming forward on smaller sites. Impacts should be positive.
15. To improve the range, quality and accessibility of services and facilities.	-/+	This option retains flexibility which could help other uses come forward on SHLAA sites, however may result in sites coming forward that are less suitable for housing and more suitable for other uses, potentially affecting access to services. Impacts could be mixed.	-	This option would allocate all SHLAA sites for housing including smaller sites. This removes any flexibility for other uses coming forward, particularly on smaller sites and may reduce the ability to respond to any future changes in the market, e.g. the need to provide other uses on these sites and may impact on access to services. Impacts could be adverse.	+	This option should result in housing coming forward on larger sites however retains flexibility on smaller sites, allowing these to respond to any future changes in the market, and could result in other uses coming forward on these sites. Impacts should be positive.
16. To improve health and well-being, and reduce inequalities in health	-/+	This option retains flexibility, however this could have mixed impacts as could both help bring development forward, but could also jeopardise housing applications through lack of certainty. This option could also result in housing coming forward on sites that are more suitable for other uses, impacting on the ability to access other services including health services. Overall impacts are considered to be mixed.	-/+	Although this option brings more certainty with regards to housing delivery, which is one of the wider determinants of health, this option could restrict other uses from coming forward on smaller sites, impacting upon access to services including health services. Overall impacts are mixed.	+	This option would result in delivery of housing, however would also allow other uses to come forward on smaller sites which would have an overall positive effect on health.
19. To contribute towards the growth of a sustainable and diverse economy, increase	-/+	Delivery of housing is intrinsically linked to economic growth. This option retains flexibility, which could help bring forward applications. However provides no certainty over	-/+	This option should result in the most certainty for housing delivery, which would impact positively on economic development. However, this approach may be too prescriptive for	+	This option should help bring forward housing on larger sites, which would impact positively on economic development. This option retains flexibility on

employment opportunities and meet local employment needs.		where housing would be supported and this may deter applications and may jeopardise housing delivery. In addition, this option may result in housing coming forward on sites which are considered more suitable for other uses, e.g. employment uses. Impacts are mixed.		smaller sites and may be inflexible and not accommodate any changes in the future market, e.g. other uses coming forward on those sites which could prevent economic growth Overall impacts are considered to be mixed.		smaller sites, and would therefore allow other uses to come forward on those sites to respond to market changes, e.g. employment uses. Impacts are considered to be positive.
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### Summary

#### Option 1 – do not allocate any sites – allow market to decide.

- This option was found to have potential for mixed positive/adverse impacts on the objectives for housing, access to services, health and economic development. The flexibility of this option could help applications come forward, having positive impacts for these objectives, yet provides no certainty that applications would be supported and may deter applications, having adverse impacts. The uncertainty could also result in housing applications coming forward on sites considered to be more suitable for other uses, adversely impacting upon economic development, access and health.
- This option was found to have potential for adverse impacts on the objectives for making the best use of land. This option provides a high degree of flexibility yet no certainty. This may deter applications, may result in vacant sites and is not considered to help make the best use of land.
- This option was found to have uncertain impacts for biodiversity, open space, landscape, heritage. This option could lead to development coming forward on sites that have ecological, landscape or heritage sensitivities, or on open space, however is uncertain until sites are known. Any risk of adverse impacts should be mitigated by CPP1 policies.

#### Option 2 – allocate all sites in SHLAA within plan period (without planning consent or with planning consent but not started)

- This option was found to have potential for significant positive impacts on the objective for housing. Allocating all SHLAA sites provides the greatest certainty for developers for where housing will be supported and should help maximise housing delivery.
- This option was found to have potential for positive impacts on the objectives for biodiversity, landscape and economic development. This option directs the majority of development to brownfield sites within the urban area which are unlikely to have ecological or landscape impacts, or to urban fringe sites where any impacts are considered to be able to be mitigated. As housing delivery is linked to economic growth, impacts on economic development should be positive.
- This option was found to have potential for mixed positive/adverse impacts on the objective for open space, best use of land and health. Although the majority of the SHLAA sites are brownfield and allocation may prevent development on open space within the urban area, some urban fringe sites are in open space uses and therefore development on these will result in loss of open space. This option could help to make the best use of larger sites, however may be too prescriptive for smaller sites, and may result in smaller sites being unable to respond to market conditions and increase vacancy. This option

would have positive impacts for health through delivery of housing, however could also prevent other uses from coming forward on smaller sites, adversely impacting upon health through restricting access.

- This option was found to have potential for adverse impacts on the objective for access to services as this option removes flexibility for other uses coming forward on any of the SHLAA sites, potentially impacting on access to services.
- This option was found to have uncertain impacts for water quality, soil quality and heritage. Impacts would depend upon whether a site contains a heritage asset and whether development brings the asset back into use or otherwise improves it, or whether sites have potential for contamination and this remediation.

### **Option 3 - allocate all sites in SHLAA capable of delivery 10+ units within plan period (without planning consent or with planning consent but not started)**

- This option was found to have potential for positive impacts on the objectives for biodiversity, SDNP, best use of land, housing, access to services, health and economic development. This option directs the majority of development to brownfield sites within the urban area which are unlikely to have ecological or landscape impacts, or to urban fringe sites where any impacts are considered to be able to be mitigated. This option should help to bring forward housing on larger sites, having positive impacts for housing, whilst retaining flexibility on smaller sites and could allow other uses to come forward in response to the market, which could have benefits for access, health and economic development.
- This option was found to have potential for mixed impacts on the objective for open space. Although the majority of the SHLAA sites are brownfield and allocation of sites may prevent development on open spaces within the urban area, some urban fringe sites are in open space uses and therefore development of these will result in loss of open space.
- This option was found to have uncertain impacts for water quality, soil quality and heritage. Impacts would depend upon whether a site contains a heritage asset and whether development brings the asset back into use or otherwise improves it, or whether sites have potential for contamination and this remediation.

### **Preferred Option**

- Overall, option 3 had more potential for positive impacts across a greater range of sustainability appraisal objectives, and less potential for adverse impacts than the other options, including potential for positive impact for biodiversity, landscape, housing best use of land, access, health and economic development.
- Although option 2 had greater potential for more significant positive impacts for housing delivery when compared with options 1 and 3, the flexibility of option 3 for smaller sites could result in greater benefits, e.g. for making the best use of land, for economic development, and for access to services, as would allow other uses to come forward in response to market conditions, whilst still allowing residential uses to come forward.
- Overall, option 2 was found to be too prescriptive and lacked flexibility, particularly for smaller sites.
- Option 1 was found to be very flexible, however lacked certainty for developers and may inhibit housing delivery, and when option 3 is compared with option 1, the certainty of allocating larger SHLAA sites was considered to be more positive for housing delivery than the flexibility of not allocating any sites.
- Option 3 is the preferred option.



**CPP2 Options Appraisal: H2 Urban Fringe Site Allocations**

**Options Appraisal**

- Option 1) No detailed policy framework and site allocations to guide new and appropriate development on the city’s Urban Fringe sites (rely on market to bring forward)
- Option 2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations
- Option 3) Bespoke criteria-based policies for each urban fringe site allocated

**Assumptions**

- Urban Fringe sites with potential for housing are known and are those referred to in the UFA 2014 and UFA 2015
- Assume that development associated with all options would be on sites identified as having development potential only, and not where development potential was no identified.
- This assessment does not assess the principal of development on the urban fringe, which was assessed during CPP1
- This assessment does not consider the general indirect effects of development, e.g. increased resource consumption.
- All potential impacts have a degree of uncertainty in the absence of developed policies, particular for options 2 and 3

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	-	Development on urban fringe sites could result in losses or damage to biodiversity. This option would not provide the opportunity to specify in policy any ecological considerations for individual UF sites.	+	Although development on urban fringe sites could result in losses or damage to biodiversity, this option will provide the opportunity to provide brief details with regards to ecological considerations for each urban fringe site. This should have positive effects on this objective.	++	This option will provide greater detail, where available, on ecological considerations for urban fringe sites, which has potential to have a more significant positive effect.
2. To protect and improve open space and green infrastructure and	-	The majority of urban fringe sites are sites in open space uses and therefore development on UF sites is likely to result in loss of open space.	-/+	This option will provide the opportunity to provide brief details with regards to open space considerations for each urban	-/++	This option will provide greater detail, where available in background studies, on open space considerations for urban fringe sites. This has potential to

improve sustainable access to it		This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help mitigate losses.		fringe site, e.g. opportunities for improvements. However, will still result in losses of open space. Impacts considered to be mixed.		have a more significant positive effect, however will still result in losses of open space, and therefore impacts are considered to be mixed.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/+	Development on UF sites could have landscape impacts, however could provide an opportunity to improve access to the SDNP and therefore impacts are mixed. This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help mitigate landscape impacts..	+	This option will provide the opportunity to provide brief details with regards to landscape considerations for urban fringe sites. This should have positive effects on this objective.	++	This option will provide greater detail, where available in background studies, on landscape considerations for urban fringe sites, which has potential to have a more significant positive effect for this objective. It could also provide details on those sites which could be gateways or facilitate access to the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-	Development on some of the UF sites could have heritage and/or archaeological impacts. This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help mitigate heritage/archaeological impacts.	+	This option will provide the opportunity to provide brief details with regards to heritage considerations, including archaeology, for urban fringe sites. This should have positive effects on this objective.	++	This option will provide greater detail, where available in background studies, on heritage considerations including archaeology, for urban fringe sites, which has potential to have a more significant positive effect for this objective.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	Development on the urban fringe sites could increase transport movements made by car in these areas, as are generally located away from sustainable transport corridors where public transport access is high. This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help mitigate transport impacts.	-/+	There has not been any further assessment of transport-related issues relating to individual urban fringe sites therefore no site by site considerations could be included. However this option does provide the opportunity to include some generic criteria although this may not be any different from CPP1. Impacts still likely to be mixed.	-/+	This option provides the opportunity to provide some generic criteria and provide some details with regards to transport considerations for each site, however as these have not formed part of any background study, this is still considered to result in mixed impacts.

6. To improve air and noise quality	-	None of the urban fringe sites are located within the AQMA, nor adjacent to the AQMA. However, as described in objective 5, transport movements could increase in these areas, which could have air and/or noise quality impacts. In addition, some of the urban fringe sites are located in very close proximity to the A27 and may be affected by existing road noise.	-/+	There has not been any further assessment of transport-related issues relating to individual urban fringe sites, including air/noise impacts. However this option does provide the opportunity to include some generic criteria although this may not be any different from CPP1. Impacts likely to be mixed.	-/+	This option provides the opportunity to provide some generic criteria and some details with regards to air/noise quality considerations, however as these have not formed part of any background study, this is still considered to result in mixed impacts.
7. To improve water quality (ecological, chemical and quantity status)	-	Some urban fringe sites are located in various zones of the GSPZ where water quality can be adversely affected by development and drainage. This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help mitigate impacts on the water environment.	+	This option will provide the opportunity to provide brief details with regards to considerations that could help improve water quality, e.g. whether the site is within a GSPZ. This should have positive effects on this objective.	+	This option provides the opportunity to provide some generic details with regards to SUDS that could be appropriate in certain GSPZ, which could help improve water quality. Impacts could be positive, however are likely to be similar to option 2, as would not be site specific.
8. To reduce the risk from all sources of flooding to and from development	-	Some of the urban fringe sites are located within areas of surface water flood risk. This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help reduce the risk of flooding.	+	This option will provide the opportunity to provide brief details with regards to whether the site is situated within an area of surface water flood risk. This should have positive effects on this objective.	+	This option also provides the opportunity to provide some details with regards to whether the site is situated within an area of surface water flood risk. Impacts could be positive, and are likely to be similar to option 2, as would be unlikely to include detailed requirements.
10. To increase the city's resilience and ability to adapt to climate change	-	The majority of urban fringe sites are in open space uses and are therefore likely to perform functions such as water absorption and temperature	+	This option will provide the opportunity to provide brief details of measures or considerations which could	+	This option provides the opportunity to provide generic measures that could be implemented which could increase the city's resilience to climate change,

		regulation, which will become more important with climate change. This option would not provide the opportunity to specify in policy any requirements for urban fringe sites which could help increase climate change adaptation. This option could therefore reduce the city's resilience to climate change.		indirectly help increase resilience to climate change, e.g. SUDs and whether there are site specific issues regarding flood risk.		however measures would be generic and unlikely to be site specific, therefore impacts are likely to be similar to option 2.
13. To make the best use of land available	-	This option would not provide the opportunity to specify in policy any suggestions for maintaining elements of ecosystems services, or opportunities for dual use which would make a better use of land and may therefore miss opportunities to make better use of land.	+	This option may set out brief considerations for each site, and may be able to provide generic requirements in relation to densities or opportunities for multi-functional uses, that make use of the site's resources e.g. maintaining ecosystem services. Impacts also likely to be positive..	+	This option may provide greater details of development densities, which may help to make better use of the sites, and may also provide details on areas which need to be protected, e.g. to continue to provide ecosystem services. Impacts likely to be positive but unlikely to be any more significant than option 2.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	-/+	This option retains flexibility, which could help bring forward applications, however provides no greater certainty over that provided in CPP1, which may deter applications and may jeopardise housing delivery. Impacts are mixed.	+	This option provides greater clarity for developers over where applications will be supported in principal. This should help contribute towards this objective, and may in particular, help to deliver certain types of housing e.g. family sized housing.	+	This option provides greater clarity for developers over where applications will be supported in principal. This should help contribute towards this objective, and may in particular, help to deliver certain types of housing e.g. family sized housing.
16. To improve health and well-being, and reduce inequalities in health	-/+	Access to open space contributes significantly towards physical health and well-being. This option would result in development of urban fringe sites, including those with open space designations and could result in loss of open space. This	-/+	This option will still result in losses of open space, however provides the opportunity to provide brief details with regards to open space considerations for each urban fringe site, e.g. improvements, which could help support health.	-/+	Impacts the same as option 2.

		option would not provide the opportunity to specify in policy any requirements relating to individual sites. However, development of housing would help deliver one of the wider determinants of health. Impacts likely to be mixed.		This option will also help to deliver housing which is one of the wider determinant of health. Impacts therefore considered to be mixed.		
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## Summary

### Option 1 – no policy and no site allocations

- This option was found to have adverse impacts for biodiversity, open space, heritage, travel, air quality, water quality, flood risk, climate adaptation, and best use of land. Without a policy, development may still come forward, however the ability to include any specific requirements in policy that may provide more effective mitigation than CPP1 alone will be removed, e.g. ecological, open space, landscape, heritage, flood prevention or opportunities which promote more effective use of land and instead development will be guided by the more generic requirements of CPP1. In addition, development could increase potential for transport movements in these locations.
- The option had mixed impacts for the health and housing objectives. Open space will be lost having health impacts and not having a policy may lose the opportunity to specify how the losses could be mitigated, e.g. by improvements elsewhere, however would delivery housing which is a wider health determinant. Also, not having a policy may provide more flexibility to developers, however also provides uncertainty and may jeopardise housing delivery on these sites.

### Option 2 – criteria based policy with schedule of allocations

- This option was found to have potential for positive impacts on the objectives for biodiversity, SDNP, heritage, water quality, flood risk, climate change adaptation and best use of land. This option will provide the opportunity to specify in policy brief considerations for each site based on background studies, e.g. ecological, heritage and landscape considerations, or based on available data, e.g. location within a Groundwater Source Protection Zone or areas of flood risk, indirectly building climate change resilience. In addition, the policy provides the opportunity to include criteria relating to densities or how to make good use of the sites, e.g. through multi-functional uses that protects some of the ecosystem services.
- This option was also found to have potential for positive impacts for the housing objective as provides clarity to developers and may help to bring applications forward.
- This option was found to have potential for mixed impacts on the objectives for open space, transport, air quality and health. Open space will be lost through development on the urban fringe, potentially also having health impacts, however this option provides the opportunity to include some site by site considerations, e.g. that may lead to better use of open space through improvements. Development on urban fringe sites may lead to increased transport

movements, with associated issues, and similar to option 1 would be likely to be mitigated through CPP1 in the absence of any further study on site-based transport impacts, although this option does provide the opportunity to include generic transport-related criteria.

### **Option 3 – bespoke policy for each site**

- This option was found to have potential for significant positive impacts on the objectives for biodiversity, SDNP, and heritage. This option will provide the opportunity to specify in policy detailed considerations for each site based on background studies where available, e.g. ecological, heritage and landscape considerations.
- This option was found to have potential for positive impacts on the objectives for water quality, flood risk, climate change adaptation, and best use of land. This option will provide the opportunity to specify in policy detailed considerations for each site based on available data, e.g. location within a Groundwater Source Protection Zone or areas of flood risk, indirectly building climate change resilience; and will provide the opportunity to include generic criteria relating to densities or how to make good use of the sites, e.g. through multi-functional uses that protects some of the ecosystem services.
- This option was also found to have potential for positive impacts for the housing objective as provides clarity to developers and may help to bring applications forward.
- This option was found to have potential for mixed impacts on the objective for open space, transport, air quality and health. Open space will be lost through development on the urban fringe, potentially also having health impacts, however this option provides the opportunity to include detailed considerations for each site, e.g. that may lead to better use of open space through improvements and could therefore be significantly positive. Development on urban fringe sites may lead to increased transport movements, with associated issues, and although this option could include some generic criteria, it is unlikely to be site specific and therefore would result in impacts similar to options 1 and 2 and would be likely to be mitigated through CPP1.

### **Preferred Option**

- Both options 2 and 3 have merits as both will provide the opportunity to include greater consideration of certain issues, particularly where there is background evidence to support this, for example biodiversity, landscape, heritage and archaeology. Also, both provide the opportunity to include some more generic criteria with regards to some issues, e.g. transport and making the best use of land.
- Although option 3 may result in more significant positive effects, the level of detail provided in a site specific policy may not be required for all sites, for instance, smaller site with less housing potential, or those with less on-site considerations/constraints and may result in unnecessary repetition.
- It is recommended that both options 2 and 3 could be pursued, with less complex sites being included in a generic urban fringe policy, and that any sites which are more complex could have their own stand-alone policy.

**CPP2 Options Appraisal: H3 Purpose Built Student Accommodation**

**Appraisal**

Option 1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA

Option 2) Criteria based policy with no preferred sites identified

Option 3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.

**Assumptions**

- Amount and location of site allocations is unknown
- New sites for PBSA could still come forward on non-allocated sites with option 1

<b>SA Objective</b>	<b>1</b>	<b>Summary of Effects</b>	<b>2</b>	<b>Summary of Effects</b>	<b>3</b>	<b>Summary of Effects</b>
1. To protect, conserve and achieve a net gain in biodiversity	-?	All types of development could have adverse impacts on biodiversity depending on their location, however also offers an opportunity to provide net gains. CP21 does not include criteria relating to consideration of biodiversity. Impacts could therefore be adverse although are also uncertain as the location of any new, non-allocated sites are unknown.	-/0?	Sites for PBSA could have an adverse impact on biodiversity depending on their location. The inclusion of criteria that discourages development which would result in an adverse impact on biodiversity could result in a neutral effect. Effects are also uncertain until criteria are known.	-/0?	Sites for PBSA could have an adverse effect on biodiversity depending on their location. If this option identified sites which did not impact upon biodiversity, then this option could avoid an adverse effect and have a neutral effect. Effects are also uncertain until sites are known.
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-?	CP21 does not include criteria relating to consideration of open space impacts and therefore applications for PBSA could come forward in unsuitable locations with this option, including those which would have an adverse impact on open space provision. Impacts could therefore be adverse	-/0?	Sites for PBSA could have an adverse impact on open space, depending on their location. The inclusion of criteria that discourages development which would result in loss of open space could result in a neutral effect. Effects are also	-/0?	Sites for PBSA could all have an adverse effect on open space depending on where they are located. If this option identified sites which did not result in loss of open space, then this option could avoid an adverse effect and have a neutral

		although are also uncertain as the location of any new, non-allocated sites are unknown.		uncertain until criteria are known.		effect. Effects are also uncertain until sites are known.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-?	CP21 does not include criteria relating to consideration of landscape impacts. This option could therefore result in PBSA coming forwards in sensitive locations, including those that may have adverse impacts on the SDNP and its setting. Effects are also uncertain and would depend on the site coming forward.	-/+?	Sites for PBSA could have an adverse impact on the SDNP and/or its setting depending on their location. The inclusion of criteria that discourages development which would result in an adverse impact on the SDNP could result in a neutral effect. If criteria encouraged development to improve links to the SDNP impacts could be positive. Effects are also uncertain until criteria are known.	-/+?	Sites for PBSA could have an adverse effect on the SDNP and its setting. If this option identified less sensitive sites which did not result in harm to the SDNP/setting, then this option could avoid an adverse effect and have a neutral effect. If this option identified sites which improved access to the SDNP, then impacts could be positive. Effects are also uncertain until sites are known.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	CP21.2 allows for high density development in locations where they are compatible with existing townscape. This should therefore support the integration of new development into the existing built environment and have positive impacts on this objective.	0	It is considered unlikely that the policy will include any additional requirements relating the historic built environment or townscapes. Impacts therefore neutral.	0	It is considered unlikely that the policy will include any additional requirements relating the historic built environment or townscapes. Impacts therefore neutral.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel	+	CP21. 3 requires PBSA to be located along sustainable transport corridors where travel to University via sustainable means can be maximised. CP21.4 requires proposals to minimise impacts on on-street parking. Impacts	0	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel. Impacts therefore neutral.	+	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel as this is already within CP21. However this option also provides the opportunity to



choice		should be positive.				allocate sites where sustainable transport provision is good, which could impact positively on this objective.
6. To improve air and noise quality	+	CP21. 3 requires PBSA to be located along sustainable transport corridors where travel to University via sustainable means can be maximised. This should have positive impacts for air quality. This is also likely to have benefits in terms of potential for noise amenity impacts, as any new sites that come forward along sustainable transport corridors are likely to be located within areas where there is already a mixture of uses, rather than in predominantly residential areas. In addition CP21.1 requires PBSA to be located in areas where amenity impacts, including those from increased noise, will not be unacceptable. Overall, impacts should be positive.	0	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel nor avoiding noise impacts and residential amenity.	+?	It is considered unlikely that the policy will include any additional requirements relating to promoting sustainable travel. However site allocation could help to reduce noise amenity impacts as would reduce reliance on HMOs to meet students' housing needs.
8. To reduce the risk from all sources of flooding to and from development	-?	All types of development could increase the risk of flooding, and this may vary according to the nature and form of the site. However development provides an opportunity to incorporate measures to reduce flood risk. CP21 does not include criteria relating to consideration of flood risk. Impacts could therefore be adverse although are also uncertain as the location of any	-/+?	Sites for PBSA could have an adverse impact on the flood risk depending on their location. The inclusion of criteria that encourages development to consider flood risk could result in a more positive effect. Effects are also uncertain until criteria are known.	-/+?	If this option identified less sensitive sites then this option could avoid an adverse effect and have a more positive effect. Effects are also uncertain until sites are known.

		new, non-allocated sites are unknown.				
10. To increase the city's resilience and ability to adapt to climate change	-?	See objective 8	-/+?	See objective 8	-/+?	See objective 8
11. To improve soil quality	0	CP21 does not include any criteria which may encourage remediation of contaminated land. Impacts considered to be neutral.	+?	PBSA could be delivered on sites with contamination and result in remediation of contaminated land. This option could include criteria that would support PBSA this, having a positive effect, however is also uncertain as criteria are unknown.	+?	PBSA could be delivered on sites with contamination and result in remediation of contaminated land. This option could allocate such sites, having a positive effect, however is also uncertain as sites are unknown.
13. To make the best use of land available	+	There is a need for PBSA in the city. This option provides a policy framework which helps to balance competing needs e.g. CP21.7 does not allow for PBSA to come forward on sites allocated for housing, or identified as having potential in the SHLAA. In addition, CP21 makes 5 site allocations. This should help to balance the needs of the city.	+?	It is considered unlikely that the policy will include any additional requirements relating to ensuring that sites with housing potential are not developed for PBSA. However the policy could include criteria that ensured the most effective use of a site was made – therefore maximising site potential, due to the increasing need. However, impacts are uncertain as criteria are unknown.	++?	The allocation of sites for PBSA is considered to have a significant positive impact on this objective as would help to ensure the competing needs of the city are met, and would also enable PBSA to be located in the most suitable locations.
14. To provide housing, including affordable housing, to contribute towards meeting	-/+	CPP1 contains 5 site allocations for PBSA, which will contribute towards meeting forecasted demand, but not meet demand. The policy (para 7) should protect against the loss of sites	-/+	This option will further support proposals for PBSA and will help applicants to determine where they may be considered acceptable based on the criteria	+	This option will support proposals for PBSA and will provide clarity and certainty to applicants with regards to acceptability in principle of PBSA on certain sites. This

local needs		considered to be suitable for general C3 housing, therefore having positive impacts. However this option could result in the need for more student HMOs to help meet demand, which can have a detrimental effect on housing provision through the loss of larger family sized dwellings, which are also in demand in the city. Overall impacts are mixed.		of the policy. However, this option may result in speculative sites coming forward that are could be suitable for C3 housing land supply, impacting on the city's ability to meet its C3 housing target. Impacts also considered to be mixed.		option should prevent speculative sites coming forward on land suitable for C3 housing, and should also help to reduce the reliance on HMOs which impacts positively on the type of housing that is often converted to HMOs. Overall impacts should be positive.
15. To improve the range, quality and accessibility of services and facilities.	-	Although this option should result in PBSA, it will not deliver the amount required to meet demand. Lack of PBSA can result in an increase in student HMOs which tend to be located in housing that would traditionally be occupied by families due to its size. Some services and facilities within areas of the city have become less viable due to the amount of students living in that area e.g. schools. This option could therefore result in an indirect adverse impact on this objective.	-	Impacts considered to be the same as option 1.	+	This option may help to ensure that communities can meet their needs locally through ensuring viable local services such as schools. E.g. the delivery of PBSA can help to reduce reliance on HMOs, and can help to maintain a more mixed and balanced community.
16. To improve health and well-being, and reduce inequalities in health	+	Student activity and lifestyles can have a detrimental impact on residential amenity, impacting on health. CP21.1 requires PBSA to be located in areas where amenity impacts, including those from increased noise, will not be unacceptable. Overall, impacts should be positive.	0	It is considered unlikely that the policy will include any additional requirements relating to avoiding noise impacts and residential amenity. Impacts therefore neutral.	+?	Site allocations could help to reduce the risk of adverse amenity impacts particularly those relating to noise and residential amenity. Impacts positive but uncertain as location of sites are unknown.
17. To improve	+	Policy CP21.5 requires proposals to be	0	It is considered unlikely that the	0	It is considered unlikely that the

community safety, and reduce crime and fear of crime		safe and secure. This should have a positive impact on this objective.		policy will include any additional requirements relating to safety. Impacts therefore neutral.		policy will include any additional requirements relating to safety. Impacts therefore neutral.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	The policy should help bring forward PBSA at the 5 sites identified in CP21 and also provides a framework for other sites of PBSA. Impacts should be positive resulting from the construction of new buildings and also through the contribution made by students in the city towards the economy.	+	Although this option provides clarity over the approach to assessing applications, it does not provide certainty to applicants over the sites where PBSA will be acceptable. This may hinder applications. However this option allows the market to decide and could be perceived as the more flexible approach. Overall, impacts are likely to be positive as criteria should help to guide applications.	+	This option provides certainty and clarity to applicants with regards to the sites where PBSA would be considered acceptable. This may help to bring forward applications having benefits for the economy. However, is more inflexible as removes the ability for the market to decide and may result in vacant site. The criteria should help to retain some flexibility in terms of alternative sites coming forward. Overall impacts are likely to be positive.

## Summary

### Option 1 – CP21 only

- This option had potential for positive impacts on a number of objectives as CP21 already includes a range of criteria that should address some issues, including heritage assets, travel, air quality, making the best use of land, health and community safety.
- This option had potential for adverse impacts on some of the site based objectives, including biodiversity, open space, SDNP and flood risk, as sites could come forward which could have an adverse impact on these issues and CP21 does not include criteria to address these issues.
- This option also had the potential for adverse impacts on objective for access to services. This option may still result in reliance on the HMO sector which can result in some services becoming unviable due to the predominance of students in certain areas.
- This option had potential for mixed (adverse/positive) impacts on the housing objective. This option contains 5 site allocations for PBSA, which will contribute towards meeting forecasted demand, but not meet demand. Speculative sites may come forward with this option and this option could result in the need for more student HMOs to help meet demand, which can have a detrimental effect on housing provision through the loss of larger family sized dwellings.

- This option had potential for positive impacts on the economic development objective through construction related employment and through the positive contribution students make towards the local economy

### **Option 2 – criteria policy**

- This option had potential for mixed (adverse/neutral) impacts on biodiversity and open space. Impacts could be adverse as could result in loss or damage to biodiversity and loss of open space, however could be neutral if the policy criteria included consideration of these issues.
- This option had potential for mixed (adverse/positive) impacts on the SDNP and flood risk, as could result in damage to the setting of the SDNP and could increase flood risk, however could be positive if criteria encouraged improving access to the SDNP and considered flood risk issues.
- This option was also found to have mixed (adverse/positive) impacts on the housing objective. This option will further support proposals for PBSA and will help applicants to determine where they may be considered acceptable based on the criteria of the policy, however may result in speculative sites coming forward that could be more suitable for C3 housing land supply, impacting on the city’s ability to meet its C3 housing target. This option may also still result in a reliance on HMOs.
- This option also had the potential for adverse impacts on objective for access to services. This option may still result in reliance on the HMO sector which can result in some services becoming unviable due to the predominance of students in certain areas.
- This option had positive uncertain impacts on objectives relating to soil quality and making the best use of land. This option could include criteria that supported PBSA coming forward on contaminated land, and could also include criteria relating to making the most effective use of sites, which would result in a positive impact.
- This option had potential for positive impacts on objectives for economic development. This option provides clarity over the approach to assessing applications, however does not provide certainty to applicants over the sites where PBSA will be acceptable. Although this may hinder applications, this option allows the market to decide and could be perceived as the more flexible approach.
- This option had neutral effects on various objectives which option 1 had a positive impact upon, as these issues are considered to be adequately addressed by CP21 and therefore are unlikely to be repeated in a new policy, including heritage assets, travel, air quality, water quality, greenhouse gas emissions, and community safety.

### **Option 3 –criteria policy and site allocations**

- As with option 2, this option had potential for mixed (adverse/neutral) impacts on biodiversity and open space. Impacts could be adverse as could result in loss or damage to biodiversity and loss of open space, however could be neutral if the policy criteria included consideration of these issues, or if the sites allocated avoided these issues.
- As with option 2, this option had potential for mixed (adverse/positive) impacts on the SDNP and flood risk, as could result in damage to the setting of the SDNP and could increase flood risk, however could be positive if criteria encouraged improving access to the SDNP and considered flood risk issues, or if the sites allocated avoided these issues.

- This option has potential for positive uncertain impacts on the objectives relating to air/noise quality and health, as this option could allow for the consideration of cumulative effects of more than one new PBSA development on residential amenity to be considered as part of the site selection process.
- As with option 2, this option had potential for positive uncertain impact on the objective relating to soil quality, as could include criteria supporting development on contaminated land, or could allocate such sites.
- This option was found to have positive impacts on the housing objective. This option will support proposals for PBSA and will provide clarity and certainty to applicants with regards to acceptability in principle of PBSA on certain sites. This option should prevent speculative sites coming forward on land suitable for C3 housing, and should also help to reduce the reliance on HMOs which impacts positively on the type of housing that is often converted to HMOs. This also impacts positively on the objective for access to services, as may help to ensure services remain viable and helps to create more balanced and mixed communities.
- This option was found to have potential for significant positive impact on making the best use of land. This option is considered to provide greater certainty for developers, which may help to bring development forward. By allocating sites that are considered to be the most suitable for PBSA, it also helps to protect sites for other uses, making the best use of sites in the city.
- As with option 2, this option should also have positive impacts on economic development. This option provides certainty and clarity to applicants with regards to the sites where PBSA would be considered acceptable and this may help to bring forward applications having benefits for the economy. However, this option is more inflexible as removes the ability for the market to decide and may result in vacant sites.
- This option has potential for positive impacts for reducing the need to travel, as could allocate sites with good sustainable transport access.
- As with option 2, This option also had neutral effects on various objectives which option 1 had a positive impact upon, as these issues are considered to be adequately addressed by CP21 and therefore are unlikely to be repeated in a new policy, including heritage assets, water quality, greenhouse gas emissions, and community safety.

### **Preferred Option**

- With all options, the potential for some of the adverse impacts would be mitigated through implementation of other CPP1 and other policy requirements.
- Overall option 3 had the most potential for positive impacts across the greatest range of sustainability objectives, in particular for housing as it provides greater certainty where PBSA would be supported which may help to bring forward development and reduce reliance on the HMO market, and also for access to services and making the best use of land as could help to ensure the competing development needs of the city are met. All options were found to have potential for adverse impacts against some of the environmental site-based objectives although options 2 and 3 would provide the opportunity to address any site specific considerations. Option 2 was considered to offer greater flexibility and the ability to respond to changing markets when compared with option 3, however this approach however lacked certainty for developers with the risk that suitable sites may not come forward resulting in increased reliance on the HMO market to meet students' housing needs.
- Overall, both options 2 and 3 have merits and have greater potential for positive impact than option 1, however option 3 may be slightly advantageous in relation to the housing objective and making the best use of land, and would also provide the ability to address any site based impacts at the site selection stage.

## CPP2 Options Appraisal: E1 Employment site allocations

### Options Appraisal

- Option 1) Do not allocate new sites for employment uses. Allow market to decide.
- Option 2) Allocate new sites for employment uses
- Option 3) Bring forward employment allocations as part of Strategic Mixed Use sites

### Assumptions

- Location of sites associated with option 1 are unknown and could be anywhere across the city.
- Assume all employment site allocations (option 2 and 3) are on brownfield sites within the built up area.
- Assume that options 2 and 3 will not repeat any policy of a strategic nature that is included in CPP1
- This assessment does not consider the general indirect developmental impacts, e.g. potential for increase in resource consumption.
- Site based impacts for all options are fairly uncertain as the location of sites are unknown, with greater uncertainty for option 1.

SA Objective	1	Summary of Effects	2	Summary of Effects	3	Summary of Effects
1. To protect, conserve and achieve a net gain in biodiversity	?	This option provides no guidance as to where development would be supported. This could result in sites coming forward in unsuitable or sensitive locations, e.g. those with ecological designations. However if suitable brownfield sites came forward then it could result in net gains. Effects are uncertain and would depend on the site coming forward.	+	Assuming that this option would allocate brownfield sites within the built up area, this option could have indirect positive impacts on this objective as may help to avoid more sensitive sites. Development of sites within the urban area may also provide opportunities to secure net gains for biodiversity. Impacts could be positive.	+	Impacts the same as option 2.
2. To protect and improve open space and green infrastructure and improve sustainable access	?	This option provides no guidance as to where employment development would be supported. This could result in sites coming forward in unsuitable or sensitive locations, e.g. those with open space designations. However could result in	+	Assuming that this option would allocate brownfield sites within the built up area, this option could have indirect positive impacts on this objective as may help to avoid development of	+	Impacts the same as option 2.

to it		suitable sites that indirectly protect open space. Effects are also uncertain and would depend on the site coming forward.		open space. Impacts could be positive.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	?	This option provides no guidance as to where employment development would be supported. This could result in sites coming forward in unsuitable or sensitive locations, e.g. those with landscape sensitivities. Effects are uncertain and would depend on the site coming forward.	+	Assuming that this option would allocate brownfield sites within the built up area, this option could have indirect positive impacts on this objective as may help to avoid development on sites which may have landscape sensitivities. Impacts could be positive.	+	Impacts the same as option 2.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	?	This option provides no guidance as to where employment development would be supported and could result in sites coming forward in unsuitable locations, including those which potentially have adverse heritage impacts. However, could result in positive impacts if development brought the asset back into use or otherwise improved it. Effects are considered uncertain and would depend on the site coming forward.	?	This option could allocate sites that contain heritage assets. If the heritage asset is vacant or could otherwise be improved by development, then this option could result in positive impacts. However, overall impacts are considered to be unknown due to the amount of uncertainty at this stage.	?	Impacts the same as option 2.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	Journeys for employment purposes make up a high proportion of journeys made, particularly during peak times. This option provides no guidance as to where employment development would be supported and could result in development coming forward in less accessible locations. Impacts could be adverse.	?	Although this option is likely to allocate sites within the urban area, not all areas of the city have the same amount of access via sustainable transport. In addition, it is unknown whether sustainable transport accessibility will be a consideration when allocating	+	This option has potential to have a positive impact on this objective, through the delivery of mixed-use development which can reduce the need to travel.



				sites. Impacts are therefore unknown.		
6. To improve air and noise quality	-?	As described under objective 5, journeys for employment purposes make up a high proportion of journeys made and this option and could result in development coming forward in less accessible locations, potentially impacting upon air quality, although it is recognised that air quality is generally worse in central locations where public transport accessibility is good. This option may also result in development coming forward where it could have amenity impacts on adjacent uses due to noise, and would depend on the type of employment use. Impacts could be adverse and uncertain as would depend on the type of employment use.	?	It is uncertain what impacts this option will have on air quality. If sites are located where they can be reached by sustainable transport, these locations tend to have the worst air quality and are unlikely to impact positively upon air quality, however may reduce the risk of it deteriorating elsewhere. As described under option 1, noise from some employment uses can have an impact on amenity, particularly if insensitively located. This option may provide the opportunity to allocate sites for certain employment which would help to avoid any future noise issues and there is considered to be less risk of noise issues with this option than with option 3. However it is unknown whether noise impacts will be a consideration when allocating sites. Impacts are considered to be uncertain.	-/+?	Mixed use developments could reduce the need to travel, which may have indirect positive impacts for air quality. However, noise from some employment uses can have an impact on amenity, particularly if insensitively located. There may be a greater risk of noise issues within mixed use developments, than in single use developments, depending on the type of employment use. Impacts considered to be mixed and uncertain, as would depend on the type of employment use.
7. To improve water quality (ecological, chemical and	0	Development may come forward on sites that are easier and less expensive to develop with this option, e.g. greenfield sites or sites that are not contaminated.	+	This option assumes that sites will be located on previously developed sites. This could include those which require	+	Impacts the same as option 2.

<p>quantity status)</p>		<p>Therefore this option may miss the opportunity to remediate any contaminated land, which can benefit the aquatic environment, however this would result in no impacts rather than adverse impacts.</p> <p>Although this option may result in development within a GSPZ, avoidance of GSPZ is unlikely to be a key consideration in site selection due to the extensive nature of GSPZ across the city. Overall effects are considered uncertain and would depend on the site coming forward.</p> <p>Any developmental impacts relating to water consumption would be addressed through CP8 Sustainable Buildings.</p>		<p>remediation which would have positive impacts for this objective.</p> <p>It is considered unlikely that this option would avoid development within a GSPZ due to the fact the majority of the city overlies the aquifer and is within various GSPZs, however if this option did avoid GSPZ then this would further support the protection of groundwater.</p> <p>Development impacts relating to water consumption addressed by CP8 Sustainable Buildings.</p>		
<p>8. To reduce the risk from all sources of flooding to and from development</p>	<p>?</p>	<p>This option provides no guidance as to where development would be supported and lets the market decide. However, it is considered highly unlikely that employment development would come forward in locations at risk of tidal flooding.</p> <p>Although this option could result in development coming forward in areas of ground/surface water flood risk, avoidance of areas of GW/SW flood risk is unlikely to be a key consideration in site selection due to the fact that many areas</p>	<p>+</p>	<p>This option should avoid development on greenfield sites, and therefore reduce the likelihood of increasing flood risk associated with a change in urban form.</p> <p>It is assumed that employment development would be directed to areas with low risk of tidal flooding.</p> <p>This option could have further beneficial impacts by reducing</p>	<p>+</p>	<p>Impacts similar to option 2.</p>

		<p>of the city are at risk of flooding.</p> <p>However, sites coming forward on greenfield sites that result in a change in form from a natural to more urbanised form can increase surface water flood risk</p> <p>Overall effects are considered uncertain and would depend on the site coming forward.</p>		<p>the risk of surface/groundwater flooding by avoiding areas at high risk, however as many areas of the city are at risk of flooding, and as this could be addressed through on site mitigation, this is unlikely to be a key consideration when choosing a site.</p>		
11. To improve soil quality	0	<p>Development may come forward on sites that are easier to develop with this option, e.g. greenfield sites or sites that are not contaminated. Therefore this option may miss the opportunity to remediate any contaminated land, however this would result in no impacts rather than adverse impacts.</p>	+	<p>This option assumes that sites will be located on previously developed sites. If this included those which required remediation which would have positive impacts for this objective, otherwise would have a neutral effect.</p>	+	<p>Impacts the same as option 2.</p>
13. To make the best use of land available	-	<p>Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants, which may deter applications on sites where applications would be welcomed, e.g. those that are vacant or under-used. This option may result in sites coming forward for employment uses which may not be considered suitable for that site, or may result in other uses coming forward, e.g. housing due to land values, resulting in an imbalance of uses across the city, and</p>	-/+	<p>Assuming that this option would allocate brownfield sites within the built up area, this option could have positive impacts on this objective as could allocate vacant or under-used sites. Allocating sites provides greater certainty and may help bring forward applications which would also help to make the best use of land. However, allocating sites for employment uses only, which is a less</p>	+	<p>This option could have positive impacts on this objective as could allocate vacant or under-used sites and make better use of these sites. Allocating sites provides greater certainty and may help bring forward applications potentially reducing vacancy. Allocations for mixed use schemes (with housing) are potentially more likely to be built out than option 2, as the housing element on any site is always likely to be delivered,</p>

		may not make the best use of the land. Impacts could be adverse.		desirable use in the city due to land values for housing, may be too restrictive and may result in sites remaining vacant and undeveloped which would not be a good use of land. Overall, impacts are considered to be mixed.		reducing the risk of whole sites remaining vacant or undeveloped. Overall, impacts should be positive.
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	Not allocating sites for employment uses may lead to more housing coming forward, due to the higher land values associated with housing and the local need for housing. Impacts could be positive.	-	Allocating sites for employment use only could have an adverse impact on this objective as would prevent housing from coming forward on these sites.	+	Allocating sites for mixed uses could have a positive impact for this objective as it is likely that the housing element of any mixed use scheme would be the predominant use. Allocating sites also brings certainty for developers which may help to bring forward applications.
15. To improve the range, quality and accessibility of services and facilities.	0	There are no impacts on this objective.	0	There are no impacts on this objective.	+	This option may also result in delivery of other uses, e.g. community facilities. Impacts could be positive.
16. To improve health and well-being, and reduce inequalities in health	-	Access to employment is one of the wider determinants of health. Although this option may result in housing delivery, which is also one of the wider determinants of health, this option would not address the need to increase employment land supply. It could also result in development of sites which provide health benefits, such as open spaces. Impacts could be adverse.	+	Allocating sites for employment should help to address the need to increase employment land supply, having positive benefits for health, as employment is one of the wider determinants of health. This option may also prevent development from coming forward on sites which may not be suitable for employment, e.g. open spaces, which have health benefits.	++	This option should prevent development from coming forward on less suitable sites, should help to address the need to increase employment land supply, and should also result in delivery of housing, contributing to the wider determinants of health. Impacts should be significantly positive.

				Impacts should be positive.		
17. To improve community safety, and reduce crime and fear of crime	-	Although this option provides a high degree of flexibility over sites and uses, this option provides no certainty for applicants. This may deter applications on sites where applications would be welcomed, e.g. those that are vacant or under-used. This could have adverse impacts on this objective.	-/+	Vacant sites can increase the fear of crime or encourage crime around these sites. This option could therefore have positive impacts on this objective if vacant or under-used sites are allocated, as allocating sites provides greater certainty and may help bring forward applications. However, allocating sites for employment uses only, which is a less desirable use in the city due to land values for housing, may be too restrictive and may result in sites remaining vacant, potentially having adverse impacts. Impacts could be mixed.	+	Mixed uses could increase the opportunity for passive and natural surveillance at different times of the day, which could have positive impacts for this objective. In addition, mixed use sites are more likely to come forward due to the housing element, may reduce the risk of sites remaining vacant, which can help reduce the fear of crime or opportunities for crime around these sites.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	--	Monitoring suggests that there has been a trend of net loss in employment floorspace over the last 5 years. This could be due to lack of employment land being offered in the city, although is also likely to be due to market forces, such as high housing land values, and also permitted development rights that allow change of use to residential. This option does not address the need to increase employment land supply in the city, could result in sites not coming forward for employment uses and could	+	This option is proactive and positively addresses the need for employment land, reduces the risk of sites being developed for housing, may help to bring forward employment land supply, and therefore supports economic growth through the benefits that increasing employment land supply has e.g. providing greater accommodation choice and reducing the risk of businesses	++	This option should also result in the positive impacts as described in option 2. However, this option is considered to have greater potential for more significant positive impact as mixed use schemes may enable employment uses to come forward more readily than with employment only schemes, although there is always the risk that the employment element may not come forward eventually.

		restrict economic growth. Impacts considered to be significantly adverse.		moving elsewhere. Although there is a risk that allocated sites are not brought forward due to market forces, overall impacts should be positive for this objective.		
Summary	Option 1 does not address the need to increase employment land supply and could have adverse impacts. Both options 2 and 3 could have positive impacts as both address the need to increase supply, should help to bring development forward and result in greater accommodation choice having economic benefits. Option 3 may be more significantly positive as mixed use schemes may enable the employment element to be delivered.					

**Summary**

**Option 1**

- This option was found to have potential for positive impacts on the objective for housing. This option would allow other uses to come forward on sites, which would most likely to result in housing due to high housing land values.
- This option was found to have potential for significant adverse impacts on the objective for economic development. This option is not considered to address the need to increase employment land supply and could restrict economic growth.
- This option was found to have potential for adverse impacts on the objectives for travel, air/noise quality, best use of land, health, and community safety. This option could result in development in inaccessible locations having transport and air quality impacts, or where development could result in noise amenity impacts; provides no certainty for applicants and could deter applications from coming forward, leading to vacant sites which don't make the best use of land as well as provide opportunities for crime; and does not address the need to increase employment land supply impacting on the wider determinants of health.
- This option was found to have potential for uncertain impacts for most of the site based objectives due to the unknown location of sites including biodiversity, open space, heritage, SDNP and flood risk. This option could lead to development coming forward on sites that have ecological, landscape or heritage sensitivities, on open space, or in areas where flood risk would be increased. Any risk of adverse impacts should be mitigated by CPP1 policies.
- This option was found to have no impacts on water or soil quality, as this option may miss the opportunity to promote development of contaminated sites.

**Option 2**

- This option was found to have potential for positive impacts on the objectives for biodiversity, open space, SDNP, water quality, flood risk, soil quality, health and economic development. This option may prevent development from coming forward in sensitive or inappropriate locations, such as open spaces or those with landscape sensitivities, those with higher flood risk, and may provide the opportunity to achieve net gains in biodiversity. Redevelopment of

brownfield sites could result in positive remediation, benefiting water and soil quality. This option would result in employment land coming forward, helping to increase supply and supporting economic growth and facilitating access to employment, which is one of the wider determinants of health.

- This option was found to have potential for adverse impacts on the objective for housing, as would prevent housing coming forward on these sites.
- This option was found to have potential for mixed impacts on the objective for making the best use of land and community safety. Although this option could help to bring development forward on under-used or vacant sites, helping to make good use of sites, it may be too prescriptive and may result in sites never being developed, having the opposite effect. Similarly, if development helped to reduce vacancy, this would support community safety, however if resulted in increased vacancy could increase fear of crime and opportunities for crime.
- This option was found to have uncertain impacts on the objectives for transport and air/noise quality. Not all sites within the urban area have good sustainable transport links and it is unknown whether transport accessibility will be a consideration. As air quality tends to be the worst in areas that have good sustainable transport provision, site allocations with good sustainable transport access may not have a positive impact on air quality however may prevent it from deteriorating elsewhere. This option may provide the opportunity to reduce the risk of noise impacts, but only if the sensitivity of adjacent uses is a consideration in site allocations.
- The impacts on the objective for heritage were also uncertain, and any benefits would depend upon a site coming forward within a vacant heritage asset.

### **Option 3**

- This option was found to have potential for significant positive impacts on the objectives for health and economic development. This option positively addresses the need to increase employment land supply having wider economic benefits and may help to bring forward development more readily than option 2, as mixed use development could enable employment uses to come forward. This option may help to deliver both housing and employment, both of which are wider determinants of health.
- This option was found to have potential for positive impacts on the objectives for biodiversity, open space, SDNP, transport, flood risk, water and soil quality, best use of land, housing, access to services and community safety. This option may prevent development from coming forward in sensitive or inappropriate locations, such as open spaces or those with landscape sensitivities, those with higher flood risk, and may provide the opportunity to achieve net gains in biodiversity. Redevelopment of brownfield sites could result in positive remediation, benefiting water and soil quality. Mixed use schemes may deliver other uses, which may increase access to these services. Mixed use developments may reduce the need to travel and will provide other uses, including housing. Mixed use developments may also come forward more readily than single use employment schemes due to the housing element, which may help to bring vacant sites back into use and make the best use of land, also having wider benefits such as helping reduce the fear of crime.
- This option was found to have potential for mixed/uncertain impacts on the objective for air/noise quality. Mixed use schemes could help reduce the need to travel, having air quality benefits, however there may be more risk of noise amenity impacts with mixed-use schemes, depending on the type of employment uses.
- The impacts on the objective for heritage were uncertain, and any benefits would depend upon a site coming forward within a vacant heritage asset.

### **Preferred Option**

- Although option 2 has potential for positive impacts for the economic development objective, which is the main objective relating to this policy area, option 3 is considered to have potential for more significant positive impact for this objective as could result in employment development coming forward more readily through mixed use schemes which contain an element of housing, helping to increase employment land supply. This could have wider benefits, such as reducing the risk of long-term vacancy of sites, helping to make the best use of land available, which also indirectly helps to reduce the fear of crime or opportunities for crime.
- Option 3 will also have positive impacts for housing, through housing delivery on mixed use sites, and helps to deliver the housing and employment determinants of health.
- Positive impacts on the site based objectives will largely be gained through avoiding more sensitive sites, and this option would need to ensure compatibility between uses in mixed use schemes in order to avoid potential for amenity impacts.



## Appendix E Likely effects without implementation of the plan

Tables to show cumulative effects of the options of “no plan/policy”

### Development management policy options

	1 biodiversity	2 open space	3 SDNP	4 Heritage	5 Travel	6 Air/noise	7 Water	8 Flooding	9 Carbon em.	10 CC Adapt	11 Soil	12 Waste	13 Land use	14 Housing	15 Access	16 health	17 Crime	18 Equalities	19 Ec. Dev.
DM1	0	0	0	0	0	0	0	0	0	0	0	0	+	-/+	0	-/+	0	-	+
DM2	0	0	0	+?	0	0	0	0	0	0	0	0	-/+	-	0	-	0	-	+?
DM3	0	-/+	0	?	-	-	-/+	0	-/+	0	0	-	+	+	0	+	0	0	0
DM4	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+	0	+	+
DM5	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+	0	+	+
DM6	0	0	0	0	+	0	0	0	0	0	0	0	0	+	0	+	0	+	+
DM7	0	0	0	-/?	-/+	-/+	0	0	0	0	0	0	+	+	0	-/+	0	+	0
DM8	-?	-?	-?	+	+	+	0	-?	0	-?	0	-	+	-/+	-	+	+	0	+
DM9	+	0	+	+	-	0	+	+	+	+	0	+	+	0	-/+	-/+	-/+	-/+?	-/+
DM10	+	0	+	+	-	0	+	+	+	+	0	+	+	0	-/+	-/+	-/+	-/+?	-/+
DM11	+	0	+	+	-/+	-/+	+	+	+	+	+	+	-/+	0	0	+	0	+	++
DM12	0	0	0	0	-/+	0	0	0	0	0	0	0	+	0	-/+	0	-/+	0	-/+
DM13	0	0	0	0	-	-	0	0	0	0	0	0	-	0	-	0	?	0	+
DM14	+	0	0	0	-	-	0	-	0	-	0	0	+	0	+	0	0	0	+
DM15	+	0	0	0	-	-	0	-	0	-	0	0	+	0	+	0	0	0	+
DM16	0	0	0	-?	0	-?	0	0	0	0	0	0	-	0	0	0	0	0	-
DM17	0/+	0	0	-	+	+	+?	-?	?	+	+?	0	-	0	0	0	0	0	-
DM18	+	++	+	++	+	0	0	0	0	0	0	0	0	0	0	++	+	+	0
DM19	-/+?	-/+	-/+?	-/+?	-/+	+	-	-/+	-	-/+	+	-	-	+	0	+	0	0	+
DM20	0	0	0	0	-	-	0	+	+	+	0	+	+	0	0	+	0	0	+
DM21	+	0	+	+	0	0	0	0	+	+	0	+	0	0	0	-/+	+	0	0
DM22	+	+	+	+	0	0	+	+	0	+	0	0	0	0	0	++	0	0	0
DM23	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+
DM24	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+
DM25	-	0	-	-	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+
DM26	+?	+?	+?	+	0	0	0	0	+	0	0	0	+	0	0	0	0	0	+
DM27	+?	0	0	+	0	0	0	0	+	0	0	+	+	0	0	0	0	0	+
DM28	+?	+	0	+	0	0	0	+	+	+	0	+	+	0	0	+	0	0	+
DM29	+?	+?	+?	+	0	0	0	+?	+	+?	0	0	0	0	0	+	0	0	+
DM30	+?	+	+?	+	0	0	0	+	+	+	0	0	0	0	0	+	0	0	+
DM31	+?	+?	+?	+	0	0	0	0	+	0	0	0	?	0	0	0	0	0	+
DM32	+?	+	0	+	0	0	0	+	+	+	0	0	0	0	0	+	0	0	+
DM33	0	+	+	0	++	+	0	0	+	0	0	0	0	0	++	++	+	+?	+
DM34	-?	-?	-?	-?	-?	-?	-?	-?	-	-?	0	0	-?	0	0?	-?	+	0	+
DM35	0	0	0	0	+	+	0	0	+	0	0	0	+	0	+	+	+	+?	+
DM36	0	0	0	0	+	+	0	0	+	0	0	0	+	0	+	+	+	+	+
DM37	+	+	0	0	0	+	0	+	0	+	0	0	0	0	0	+	0	0	0
DM38	+	+	+	+	0	0	0	+	0	+	0	0	0	-	0	+	0	0	0
DM39	+	+	+	+	-/+	-/+	+	+	+	+	?	0	++	++	+	+	+	0	++
DM40 a	0	0	0	0	0	+	0	0	+	0	0	0	0	0	0	+	0	+	+
DM40 b	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0
DM40 c	+	+?	+	0	0	+	+	0	0	0	+	0	0	0	0	+	0	0	0
DM41 a	+	0	0	0	0	+	+	0	0	0	-/+	0	0	0	0	+	0	0	0
DM41 b	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0	0
DM41 c	0	0	0	0	0	0	+	0	0	0	+	0	+	0	0	+	0	0	0
DM42	+	0	0	0	0	0	++	+	0	+	0	0	0	0	0	+	0	0	0
DM43	+	0	0	0	0	0	++	++	0	+	+	0	0	0	0	+	0	0	0
DM44	+	0	+	+	0	0	0	0	+	0	0	0	0	0	0	+	0	+	0
DM45	+	0	+	+	0	-	0	0	++	0	0	+	0	0	0	+	0	+?	0
DM46	0	0	0	0	0	-?	0	0	+	0	0	+	0	0	0	-/+?	0	0	0

Strategic Allocation Policy Options

	1 biodiversity	2 open space	3 SDNP	4 Heritage	5 Travel	6 Air/noise	7 Water	8 Flooding	9 Carbon em..	10 CC Adapt	11 Soil	12 Waste	13 Land use	14 Housing	15 Access	16 health	17 Crime	18 Equalities	19 Ec. Dev.
SA7	-	-	-/+	-	-	-	-	-	0	-	0	0	-	-/+	0	-/+	0	0	0
SSA1	?	?	?	?	-	-/+?	0	?	0	0	0	0	-	+	-	+	-	0	--
SSA2	?	?	?	?	-	-/+?	0	?	0	0	0	0	-	+	-	+	-	0	--
SSA3	?	?	?	?	-	-/+?	0	?	0	0	0	0	-	+	-	+	-	0	--
SSA4	?	?	?	?	-	-/+?	0	?	0	0	0	0	-	+	-	+	-	0	--
SSA5	+	+	+	+	-/+	-/+	+	+	+	+	?	0	++	++	+	+	+	0	++
SSA6	+	+	+	+	-/+	-/+	+	+	+	+	?	0	++	++	+	+	+	0	++
SSA7	?	?	?	?	-	-/+?	0	?	0	0	0	0	-	+	-	+	-	0	--
H1	?	?	?	?	0	0	0	0	0	0	0	0	-	-/+	-/+	-/+	0	0	-/+
H2	-	-	-/+	-	-	-	-	-	0	-	0	0	-	-/+	0	-/+	0	0	0
H3	-?	-?	-?	+	+	+	0	-?	0	-?	0	-	+	-/+	-	+	+	0	+
E1	?	?	?	?	-	-?	0	?	0	0	0	0	-	+	0	-	-	0	--

## Appendix F Site Allocations Site Assessments

### Special Area policies

#### SA7 Benfield Valley

See assessment for Benfield Valley under H2 Urban Fringe Housing Allocations

### Strategic Mixed Use Site Allocations

#### SA site assessment: SSA1 Brighton General Hospital, Elk Grove, Brighton

<b>Site Description</b>	A PDL site consisting of numerous buildings, including the Grade II listed Arundel building and ambulance station, and all in use providing various health services.
<b>Site Area</b>	5.77ha
<b>Current Use</b>	In use providing various health and care services, including ambulance station. Site includes various areas of amenity greenspace.
<b>Potential Use</b>	Site considered to be strategic in nature and could have potential for a mix of uses, including 200 dwellings.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	++	Large PDL site which does not contain nor is adjacent to any nature conservation designations. Site unlikely to have potential for nature conservation interest and offers potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	The site includes some areas of amenity greenspace which may be lost through redevelopment. The site meets accessibility standards for at least 1 type of open space, although the nearest children's equipped playspace is further than the minimum accessibility standards.
3. To protect, conserve and enhance the South Downs National Park and	0	Site is within urban area and is screened from the SDNP by existing buildings.

its setting, and improve sustainable access to it.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	The site contains the Grade II listed Arundel building which is in a prominent hilltop location visible from various points of the city. Development of site could result in loss or deterioration of the building or its setting.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Very good access to regular bus services. Local shops located within walking distance. Reasonable access to other services. Unknown whether the site would have any potential for car-free housing.
6. To reduce air and noise pollution.	-/+	The site is located outside the AQMA and does not suffer from road noise. However, the site may generate an amount of traffic that could reduce air quality in the area, although it is accepted that the site currently generates a certain amount of traffic.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL. Situated within Flood Zone 1. Small areas of low to medium risk of surface water flooding on site. No risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	+	Although the site is not located within a heat network cluster area, the strategic nature of the site may offer potential to incorporate LZC technologies/infrastructure and other measures to reduce energy consumption.
10. To increase the city's resilience and ability to adapt to climate change.	-	The site contains some areas of green infrastructure (amenity greenspace). The site also has a low-medium risk of surface water flooding on site. Loss of green spaces/green infrastructure, combined with risk of flooding on site may increase site vulnerability to the impacts of climate change.
11. To improve soil quality	+	Site may have potential for contamination based on current medical uses which would require remediation.
12. To minimise and sustainably manage waste	+	Development of the site may facilitate adaptive re-use of some of the existing buildings on site.
13. To make the best use of land available.	+	Development may facilitate adaptive re-use of existing buildings. If 205 dwellings delivered this would provide a site density of 35dph, which although lower than the CPP1 density targets, may reflect the need to conserve the heritage assets.

14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 205 dwellings could be provided. This would include 40% affordable units and would make a significant contribution towards housing in the city.
15. To improve the range, quality and accessibility to services and facilities.	+	Mixed use development may provide opportunity to increase provision of some services on site. Primary school within acceptable walking distance (700m). Some services within acceptable walking distance including shop (300m) and GP (650m). Open spaces (not including on-site amenity greenspace) and secondary schools over preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Mixed use opportunity may provide opportunity to increase provision of some services on site. Primary school within acceptable walking distance (700m). Some services within acceptable walking distance including shop (300m) and GP (650m). Open spaces (except amenity greenspace) and secondary schools over preferred maximum walking distance. Any loss of on-site open space could impact upon health, e.g. through reduced ability for physical activity/impacts on mental well-being.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is easily and safely accessible by transport. Development of a mixed use scheme could increase opportunities for passive surveillance/community interaction. Site located within 40% most deprived SOA (crime domain).
18. To increase equality and social inclusion		Site within 10% most deprived SOAs (education and employment domains) and could therefore provide opportunities for training/skills for local deprived communities. Site has potential to deliver 82 affordable units (40% of 205 units) which would make a significant contribution towards affordable housing in the city.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	Redevelopment of the site is predominantly housing led however will also include health facilities where it is assumed that existing jobs will be re-provided.
<b>Overall Summary and Policy Considerations</b>	Mixed	No issues: Development of the site is unlikely to raise issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; SDNP due to situation within an urban context; transport due to proximity to sustainable transport and some services; water quality as site not within GSPZ; access and health due to reasonable proximity to some services; employment, as development of site will to result in loss of employment land and should enable health jobs to be relocated.  Potential adverse effects: Development of the site could result in loss of amenity greenspace situated on site. The site contains designated

	<p>heritage assets which could be adversely affected by redevelopment. Although not within an AQMA or area that suffers from high levels of road noise, the amounts of proposed development on the site could result in a significant increase in vehicle movements around the site, which could have air and noise quality impacts. The site includes areas at low to medium risk of surface water flooding, and any loss of open space and an increased urbanisation of the site could increase this risk, impacting on climate change adaptation.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 205 dwellings are provided this should include 82 affordable units making a significant contribution to housing need. Although this would only equate to a site density of 35dph, this may reflect the need to sensitively consider the on-site heritage assets as well as providing other uses. Redevelopment of the site may provide the opportunity of adaptive re-use of existing buildings, helping to make the best use of land and helping to conserve resources/reduce waste. The site may have potential for contamination which would require remediation and help to improve soil quality. The site may provide opportunities for nature conservation enhancement. The strategic size of the site may provide opportunities for incorporating low/zero carbon technologies. Development of a mixed use scheme may provide opportunities for community interaction by providing passive surveillance. The site may be able to provide employment/training opportunities for locally deprived communities.</p>
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**SA site assessment: SSA2 Combined Engineering Depot, New England Road, BN1 3TU**

<b>Site Description</b>	A PDL site located within a steep cutting, consisting of operational railway land and a variety of buildings occupied by Colas Rail, Govia Thameslink and British Transport Police adjacent to Brighton mainline railtrack.
<b>Site Area</b>	1.39ha
<b>Current Use</b>	In use as operational railway land (entire site sui generis)
<b>Potential Use</b>	Site considered to be strategic in nature and could have potential for a mix of uses, including 100 dwellings and employment floorspace.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain nor is adjacent to any sites of nature conservation importance. Does not contain any BAP habitats. May provide opportunity for nature conservation enhancement.
2. To protect and improve open	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open

space and green infrastructure and improve sustainable access to it.		space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within urban area.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site is in fairly close proximity to the listed railway viaduct and immediately adjacent to West Hill Conservation Area. Currently adjacent West Hill Conservation Area (Howard Place) benefits from strategic views of the city across the site, due to topography. Development of site could result in deterioration of the assets and their settings.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++?	Very good access to various forms of sustainable transport. Range of essential services nearby and in walking distance although it is recognised that the pedestrian environment is poor in this location. Location of site may offer potential for an element of car-free housing.
6. To reduce air and noise pollution.	--	Site entirely within AQMA and existing streetscape may prohibit dispersal of pollutants. Amount of development delivered on site may generate an amount of vehicle movements that could have a significant effect on air quality. Site also suffers from high levels of noise from both road traffic and railway.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	PDL site. Within flood zone 1. Small part of site has low risk of surface water flooding. Majority has no risk. No risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within heat network cluster opportunity area. Strategic size of site may also may offer potential to incorporate other LZC technologies/infrastructure and other measures to reduce energy consumption.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site has potential for contamination based on current uses which would require remediation.
12. To minimise and sustainably manage waste	--	Redevelopment of site would not provide opportunity to re-use any of the existing buildings on site and would require use of natural resources.

13. To make the best use of land available.	+	PDL site. Redevelopment may provide opportunity to make better use of site. If 100 dwellings are provided, this would equate to a site density of 72 dph. Although this is below CPP1 density targets for development within a Development Area, this may reflect the opportunity to provide other uses on site, as well as the constrained nature of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 100 dwellings could be delivered on site. This would include 40% affordable unit and would make a significant contribution towards housing need.
15. To improve the range, quality and accessibility to services and facilities.	+	Good access to most services. Primary schools within desirable walking distance. Shops, health, secondary schools, open spaces all within acceptable walking distance. However, accepted that the pedestrian environment is poor in this location.
16. To improve health and well-being, and reduce inequalities in health.	+?	Good access to most services. Primary schools within desirable walking distance. Shops, health, secondary schools, open spaces all within acceptable walking distance. However, accepted that the pedestrian environment is poor in this location.
17. To improve community safety, and reduce crime and fear of crime.	+?	Situated within the 50% most deprived domain (crime). Delivery of a mix of uses on the site could increase passive surveillance. Site may have some access issues and the pedestrian environment is of poor quality in this location.
18. To increase equality and social inclusion	+	Site has potential to deliver 40 affordable units (based on 100 dwellings) which would make a significant contribution towards affordable housing in the city. Site located in close proximity to some SOA within the most 20% deprived SOA (employment and education) and could therefore provide opportunities for training/skills for local deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	Site is sui generis uses as operational land, although includes officer space occupied by Colas Rail, Govia Thameslink and British Transport Police. Redevelopment of site could improve quality of employment floorspace provided on the site.
<b>Overall Summary and Policy Considerations</b>	Mixed	No issues: Development of the site is unlikely to raise issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as the site does not contain any open space; SDNP due to situation within an urban context; transport due to proximity to sustainable transport and some services; water quality as site not within GSPZ; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to reasonable proximity to some services. Although redevelopment is not considered to have issues in relation to transport and access to services, it is recognised that the pedestrian environment is of poor quality



	<p>around the site due to volume of traffic and fairly narrow streetscape which may inhibit active travel and influence travel choice.</p> <p>Potential adverse effects: Development of the site could raise issues with heritage, with the site adjacent to a Conservation Area and within the setting of the listed railway viaduct. The site is within the AQMA, the adjacent streetscape may limit dispersal of pollutants and the amount of development proposed may significantly increase vehicle movements. The site also suffers from high levels of road and railway noise which could impact upon occupier amenity. There is low risk of flooding on site which would require on-site SUDS to ensure the risk is managed on site. In addition, development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 100 dwellings are provided this should include 40 affordable units making a significant contribution to housing need. Although this would only equate to a site density of 75dph, this may reflect the need to sensitively consider adjacent heritage assets as well as providing other uses and would still make good use of a previously developed site. The site may have potential for contamination which would require remediation and help to improve soil quality. The site may provide opportunities for nature conservation enhancement which would also support climate change adaptation. The strategic size of the site may provide opportunities for incorporating low/zero carbon technologies including connection to a nearby heat network cluster, supporting climate change mitigation. Development of a mixed use scheme may provide opportunities for community interaction by through passive surveillance, supporting community safety. The site may be able to provide employment/training opportunities for locally deprived communities. The site is currently in sui generis uses and therefore any new employment floorspace(B uses) delivered on site will be a net gain and will provide the opportunity to provide improved and modernised floorspace.</p>
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**SA site assessment: SSA3 Land at Lyon Close, Hove**

<b>Site Description</b>	A previously developed site in active uses comprised of Peacock Industrial Estate, Preece House (B1), P&H House (B1), Spitfire House, 141 Davigdor Road (B1), and 113-119 Davigdor Road.
<b>Site Area</b>	c. 3.2ha

<b>Current Use</b>	Site predominantly in light industrial and office uses. Lyon Close also includes some large retail units.
<b>Potential Use</b>	Site considered to be strategic in nature and could have potential for a mix of uses, including 300 dwellings and employment floorspace.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain nor is adjacent to any sites of nature conservation importance. Does not contain any BAP habitats. May provide opportunity for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	PDL site. Development will not result in loss of open space however is unknown whether it will result in increase in open space due to site size and on-site potential requirements. S
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within urban area.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	The western extent of the site is immediately opposite The Willett Estate Conservation Area. Development of the site could impact upon the adjacent Conservation Area. Site does not have potential for archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Very close access to bus-stop providing 1 service and fairly good access (c.600m) to various regular bus services and some essential services nearby. Site could have potential for some car-free housing.
6. To reduce air and noise pollution.	+/-	The site is not within the AQMA, however, the amount of development may generate an amount of vehicle movements that could have an effect on air quality. The site does not have any issues with road noise, however parts of the site adjacent to the railway suffer from high levels of railway noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within GSPZ.
8. To reduce the risk from all	--	Site is PDL. Within Flood zone 1. Some parts of site have risk of surface water flooding. Part of site may be at

sources of flooding to and from development		risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within a heat network cluster area however size of site may provide opportunity to incorporate LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	The site has potential for contamination based on some current light industrial uses, which would require remediation.
12. To minimise and sustainably manage waste	+	Redevelopment of parts of the site may allow for adaptive re-use of some of the existing premises.
13. To make the best use of land available.	+	PDL site in existing use. Redevelopment could facilitate re-use of existing buildings. Site capable of meeting minimum density targets set by CPP1 (c95dph).
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 300 dwellings could be delivered on site. This would include 40% affordable unit and would make a significant contribution towards housing need.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to most services. Health (200m), shops (100m), open spaces (200m), primary (400m) and secondary schools (1,200m) all within desirable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to most services. Health (200m), shops (100m), open spaces (200m), primary (400m) and secondary schools (1,200m) all within desirable walking distance.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is easily accessible. Delivery of a mix of uses on the site could increase passive surveillance. Site is situated within 50% least and 10% least SOA (crime domain).
18. To increase equality and social inclusion	+	Site has potential to deliver 120 affordable units (40% of 300) which would make a significant contribution to affordable housing provision. Site not located in close proximity to any education or employment deprived SOA and may not offer potential for training/skills.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-/+	Site currently occupied entirely by premises providing employment floorspace or jobs. It is unknown whether the delivery of new employment floorspace would result in an overall net gain or net loss. However delivery of new employment floorspace, which is more capable of meeting modern employment needs is likely to provide improved employment land in comparison with existing on site provision.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</p>	<p>No issues: Development of the site is unlikely to raise issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as the site does not contain any open space; SDNP due to situation within an urban context; transport due to proximity to sustainable transport and services; water quality as not within a GSPZ; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to proximity to services.</p> <p>Potential adverse effects: Although the site is not within the AQMA, the amount of development proposed may increase vehicle movements which could impact upon air quality. Parts of the site suffer from high levels of railway noise which could impact upon occupier amenity. Parts of sites have a risk of surface water flooding and groundwater flooding. The western side of the site is opposite a Conservation Area and could have heritage impacts. There may be a possible net loss in employment floorspace.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 300 dwellings are provided this should include 120 affordable units making a significant contribution to housing need. This would equate to a site density of around 95dph, and would help make better use of a previously developed site. The site may have potential for contamination which would require remediation and help to improve soil quality. The site may provide opportunities for nature conservation enhancement which would also support climate change adaptation. The strategic size of the site may provide opportunities for incorporating low/zero carbon technologies, supporting climate change mitigation. Re-development of some of the buildings on the site will provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Development of a mixed use scheme may provide opportunities for community interaction through passive surveillance, supporting community safety. Although redevelopment could result in loss of existing employment premises, it will provide the opportunity to deliver improved and modernised employment floorspace as part of a mixed use scheme.</p>
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**SA site assessment: SSA4 Land at Sackville Trading Estate and Coal Yard, Sackville Road, Hove**

<b>Site Description</b>	A brownfield site comprised of a trading estate with 12 units providing a mixture of uses. Site also includes the coal yard, situated at the southern end of the site adjacent to the railway.
<b>Site Area</b>	1.77ha
<b>Current Use</b>	Trading estate comprises trade counters, as well as retail units (A1), some light industrial (B1c) and storage/distribution (B8). Some units on the estate are vacant. The site also includes the city car pound and coal yard situated at the southern end of the site.
<b>Potential Use</b>	Site considered to be strategic in nature and could have potential for a mix of uses, including 550 dwellings, employment floorspace and community uses.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain nor is adjacent to any sites of nature conservation importance. Does not contain any BAP habitats although the site benefits from some tree cover that screens part of the site from the road. May provide opportunity for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unknown whether it will result in on site gains in public open space due to quantum anticipated.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within urban area.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within, nor adjacent to any heritage assets and has no known archaeological potential. Hove Station Listed Building and Hove Station Conservation Area located to the east of the site, however are separated by the railway and existing buildings.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to various forms of sustainable transport providing regular services, although pedestrian legibility to nearby railway station is poor. Some essential services nearby. Location of site offers potential to deliver some car-free housing.
6. To reduce air and noise pollution.	--	Site entirely within AQMA. Amount of development delivered on site may generate an amount of vehicle

		movements that could have a significant effect on air quality. Site also suffers from high levels of noise from both road traffic and railway.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site located within GSPZ 1 and 2.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL. Within flood zone 1. Small part of site has low risk of surface water flooding. Site could be at risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	++	The site is within the Hove Park Heat Network Cluster Area and therefore offers good potential to connect to an existing/future network.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	++	The coalyard site has potential for significant contamination which would require remediation. Other industrial units of the trading estate may also have potential for contamination.
12. To minimise and sustainably manage waste	--	Redevelopment of the site will not make use of any of the existing buildings on site.
13. To make the best use of land available.	++	Site offers potential to regenerate a party vacant/derelict site and make better use of the site. If 550 dwellings are provided this would deliver a site density of 310dph which exceeds CPP1 density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 550 dwellings could be delivered on site. This would include 40% affordable unit and would make a significant contribution towards housing need.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to most services. Shops, open spaces, primary and secondary schools within desirable walking distance. Health facilities beyond acceptable walking distance although less than preferred maximum. In addition, mixed use scheme may result in provision of services on site.
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to most services. Shops, open spaces, primary and secondary schools within desirable walking distance. Health facilities beyond acceptable walking distance although less than preferred maximum. In addition, mixed use scheme may result in provision of services on site.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is easily and safely accessible. Delivery of a mix of uses on the site could increase passive surveillance. Development on site could provide opportunity for community interaction. Site is within the 50% most deprived SOA (crime domain).
18. To increase equality and social	++	Site could deliver a high amount of affordable housing. Site itself has relatively low levels of employment and

inclusion		education deprivation, however is immediately adjacent to SOA within 30% most deprived (education and employment and could therefore provide opportunities for training/skills for adjacent deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+/-	The site currently only includes land in employment uses and it is unknown whether the delivery of new employment floorspace would result in an overall net gain or net loss. However delivery of new employment floorspace, which is more capable of meeting modern employment needs would provide improved employment land in comparison with existing on site provision.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as the site does not contain any open space; SDNP due to situation within an urban context; heritage due to location of nearby heritage assets in relation to the site; transport due to proximity to sustainable transport and some services; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to proximity to services. Although redevelopment will result in loss of existing employment premises, it will provide the opportunity to deliver improved and modernised employment floorspace.</p> <p>Potential adverse effects:</p> <p>The site is within the AQMA and the amount of development proposed may significantly increase vehicle movements. The site also suffers from high levels of road and railway noise which could impact upon occupier amenity. There is low risk of flooding on site which would require on-site SUDS to ensure the risk is managed on site. The site is within a GSPZ 1 and 2 and construction may impact upon water quality. In addition, development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. There may be a possible net loss in employment floorspace.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 550 dwellings are provided this should include 220 affordable units making a significant contribution to housing need. This would equate to a site density of 310dph, and would help make better use of a previously developed site. The site is likely to have potential for contamination which would require remediation and help to improve soil quality. The site may provide opportunities for nature conservation enhancement which would also support climate change adaptation. The strategic size of the site may provide opportunities for incorporating low/zero carbon technologies and the site is located within a heat network cluster, supporting climate change mitigation.</p>

		Development of a mixed use scheme may provide opportunities for community interaction through passive surveillance, supporting community safety. The site may be able to provide employment/training opportunities for locally deprived communities. Although redevelopment will result in loss of existing employment premises, it will provide the opportunity to deliver improved and modernised employment floorspace more able to meet modern employment needs
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#### SA site assessment: SSA5 Madeira Terraces, Madeira Drive

<b>Site Description</b>	Madeira Terrace is a grade II listed structure including 151 arches, promenade with raised walkway and associated buildings and lifts.
<b>Site Area</b>	0.5ha
<b>Current Use</b>	Some existing retail, cultural and leisure uses occupy some of the arches/units within Madeira Terraces.
<b>Potential Use</b>	Site has potential for a range of uses including retail (A1, A2, A3, A4, A5), commercial (B1), hotel (C1), museums (D1) and leisure uses (D2).

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-	PDL site not within close proximity to any national nature conservation designations. The area includes the Volk's Railway SNCI and adjoins the Black Rock SNCI.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	The Terrace itself is a grade II listed structure in need of significant improvement. Site is also within the East Cliff Conservation Area and Kemp Town Conservation Area.
5. To reduce the need to travel by	+	Fairly good access to bus stops providing regular services across the length of the terrace. Access to existing



car, encourage travel by sustainable forms of transport and improve travel choice.		public transport will be improved following improvements to Madeira Terraces.
6. To reduce air and noise pollution.	-	Site not within AQMA. Site subject to varying levels of road noise between 55-69dcbIs.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	Site situated within flood zone 1. Some small parts of the site have a low risk of surface water flooding.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat cluster opportunity area. Unknown whether potential leisure uses of site would provide opportunity to incorporate low/zero carbon technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	PDL site. Development of site will not result in any loss of green infrastructure.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former/current uses.
12. To minimise and sustainably manage waste	++	Development of this site should ensure Terraces are therefore resources are preserved for the future. This could involve renovation of the arches to provide new commercial/retail units.
13. To make the best use of land available.	++	Redevelopment and preservation of the Terraces would bring part derelict/vacant sites back into use, and help to make the use of city's assets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	0	Not allocated for housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Site will provide retail, commercial and leisure uses and increase access to this type of provision for the local neighbourhood. Access to other services is not considered, as not of relevance to these types of use.
16. To improve health and well-being, and reduce inequalities in health.	++	Site will provide retail, commercial and leisure uses and increase access to this type of provision for the local neighbourhood. Access to other services is not considered, as not of relevance to these types of use. Leisure uses on this site could also facilitate access to other forms of recreation, having health benefits.
17. To improve community safety, and reduce crime and fear of crime.	--	Site is located within 10% worst deprived SOAs (crime domain). Development should incorporate features to design out crime. Development in this location could help to increase passive surveillance and reduce the fear of crime.

18. To increase equality and social inclusion	+	Site is within 30% and 40% most deprived SOAs employment domain, and should provide employment opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	The potential uses should result in an increase in B1 employment floorspace, as well as other uses that will provide employment opportunities. Redevelopment of the site may also help to increase footfall to the wider area having economic benefits.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: open space as site does not include any designated open space; SDNP due to location within urban area; transport due to access to public transport; air quality as site located outside the AQMA; water quality as site located outside a GSPZ; flood risk as there is no risk of tidal/fluval/surface water flooding on site; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment of an urbanised site. Site is not allocated for housing.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity due to proximity to Volk's Railway and Black Rock SNCIs and heritage assets as site spans two Conservation Area and is itself a listed structure. Road noise is an issue across the site. The site is not within a heat cluster opportunity area. The site is located within an area of high crime deprivation.</p> <p>Potential positive effects: Development of the site for retail, commercial and leisure uses would increase access to these types of use for the local area and would have positive impacts for the local economy through increasing job opportunities and potentially increasing footfall in this area, benefiting other businesses along this area of the seafront. Development of a site which includes some derelict and vacant sites would help to make better use of the land, would facilitate adaptive re-use and could help preserve resources. Redevelopment may also help support community safety in this location by providing more active uses and passive surveillance. The site is within a SOA with fairly high levels of employment deprivation; development could therefore provide opportunities to increase skills and access to employment.</p>

**SA site assessment: SSA6 Former Peter Pan Leisure Site, Madeira Drive**

<b>Site Description</b>	PDL site comprising an area of hardstanding situated within the beach area, adjacent to Madeira Drive and existing leisure uses.
<b>Site Area</b>	0.09ha
<b>Current Use</b>	Vacant area of hard-standing
<b>Potential Use</b>	Site has potential for leisure uses

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	PDL site not within close proximity to any national nature conservation designations. Site is immediately adjacent to Volk's Railway SNCI which borders the site.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site is within the East Cliff Conservation Area and is within the setting of the Madeira Terrace listed structure, c.25m from the site. Site not within an ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Fairly good access to bus stops providing regular services. Access will be improved following improvements to Madeira Terraces.
6. To reduce air and noise pollution.	-	Site not within AQMA. Site subject to road noise between 55-59dcbls.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all	++	Site situated within flood zone 1 and has low risk of tidal flooding despite its seaside location. No risk of surface

sources of flooding to and from development		water flooding.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat cluster opportunity area. Unknown whether potential leisure uses of site would provide opportunity to incorporate low/zero carbon technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	PDL site. Development of site will not result in any loss of green infrastructure.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	0	Site does not currently contain any buildings which could be made use of through adaptive re-use and therefore does not provide opportunity to save resources or reduce waste.
13. To make the best use of land available.	++	Site has been vacant for some time. Development on site would bring back into use a derelict PDL site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	0	Not allocated for housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Site will provide leisure uses and increase access to this type of provision for the local neighbourhood. Access to other services is not considered, as not of relevance to this type of use.
16. To improve health and well-being, and reduce inequalities in health.	++	Site will provide leisure uses and increase access to this type of provision for the local neighbourhood. Access to other services is not considered, as not of relevance to this type of use. Leisure uses on this site could also facilitate access to other forms of recreation, having health benefits.
17. To improve community safety, and reduce crime and fear of crime.	--	Site is located within 10% worst deprived SOA (crime domain). Development should incorporate features to design out crime. Development in this location could help to increase passive surveillance and reduce the fear of crime.
18. To increase equality and social inclusion	+	Site is within 40% most deprived SOA employment domain, and could provide employment opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	Although employment floorspace would not be provided, leisure uses would create job opportunities in this location, and may also help to increase footfall to the wider area having economic benefits.

<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: open space as site does not include any designated open space; SDNP due to location within urban area; transport due to access to public transport; air quality as site located outside the AQMA; water quality as site located outside a GSPZ; flood risk as there is no risk of tidal/fluval/surface water flooding on site; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment of an urbanised site. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site. Site not allocated for housing.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity due to proximity to Volk's Railway SNCI and heritage assets as site within a Conservation Area and in close proximity to a listed structure. Road noise is an issue on the site. The site is not within a heat cluster opportunity area. The site is located within an area of high crime deprivation.</p> <p>Potential positive effects: Development of the site for leisure uses would increase access to this type of use for the local area and would have positive impacts for the local economy through increasing job opportunities and potentially increasing footfall in this area, benefiting adjacent uses. Development of a derelict and vacant site would help to make better use of the site and may also help support community safety in this location by providing more active uses and passive surveillance. The site is within a SOA with fairly high levels of employment deprivation; development could therefore provide opportunities to increase skills and access to employment.</p>
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**SA site assessment: SSA7 Land Adjacent to American Express Community Stadium, Village Way**

<b>Site Description</b>	The site comprises a vegetated landscaped bund formed during the development of the Community Stadium adjacent to the stadium, stadium car-parking and A27.
<b>Site Area</b>	0.6ha
<b>Current Use</b>	Vegetated landscape bund
<b>Potential Use</b>	Site allocated B1a (offices) and/or D1 (health/education) uses associated with the Stadium and/or the Universities.

SA Objective	Score	Commentary
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1. To protect, conserve and achieve a net gain in biodiversity.	++	Site does not contain nor is adjacent to any sites of nature conservation interest. Development of site could have potential to result in net gains in biodiversity.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses of open space and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site is in close proximity to and potentially within the setting of the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site does not contain any heritage assets or archaeology, but could be within the setting of heritage assets, including listed buildings, historic park & garden and conservation area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-	Very good access to regular bus and rail services. However location on edge of city adjacent to A27 could influence travel choice by car. All local services situated more than 1,200m from site and unlikely to be within walking distance.
6. To reduce air and noise pollution.	-/+	Site not within AQMA. Unknown whether development of site for employment/health/education uses would generate a change in average vehicle flow which would significantly impact upon air quality in this location. However, site adjacent to A27 and subject to road noise exceeding 55 dcbIs which could impact on occupier amenity although this may not be so much of an issue with employment uses.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site within GSPZ 2 and in close proximity to GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	-	PDL site. Within floodzone 1. C.50% of site at risk of surface water flooding (low and high risk). Site has a risk of groundwater flooding with water levels between 0.025m and 0.5m below surface
9. To reduce emissions of greenhouse gases that cause climate change	+	Site located within the Brighton Paddock Field heat cluster opportunity area and could have potential to link to a heat network.
10. To increase the city's resilience and ability to adapt to climate	-	Site is a vegetated landscape bund, which consists of grassed area. Development of the site would result in loss of this green infrastructure provision.

change.		
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	0	Site has no existing structures on site which could be re-used.
13. To make the best use of land available.	+	This is a PDL undeveloped site. Development on the site would make better use of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	0	No housing is proposed for the site.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has very good access to public transport. Development of site, potentially to include health/education uses could increase access to these types of services (although presumed education is likely to be for university purposes). Access to schools, other health and shops less of a consideration for an employment/health/education site.
16. To improve health and well-being, and reduce inequalities in health.	+	Development of site, potentially to include health/education uses could increase access to these types of services (although presumed education is likely to be for university purposes). Development of site will not result in loss of open space. Site has good air quality, although it is recognised the site has noise issues, although this may be less of a consideration for an employment site.
17. To improve community safety, and reduce crime and fear of crime.	+	Site situated within 50% most deprived SOA (crime domain). Delivery of employment/health/education uses on site would increase activity at different times of the day, provide passive surveillance and support community safety.
18. To increase equality and social inclusion	++	Site situated within 50% most deprived SOA (employment domain) and 10% most deprived SOA (education domain). Development could therefore provide training opportunities for locally deprived communities.
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. Site has excellent access to SRN which may support business in this location. Site may also provide health/education jobs which are significant employers in the city.
<b>Overall Summary and Policy Considerations</b>	Mixed	No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity, as there are no designations on site; open space as site will not result in any losses in designated open space; air quality as site located outside the AQMA; soil quality as site unlikely to be contaminated. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site. Site allocated for non-residential uses therefore will not have any benefits for housing.

	<p>Potential adverse effects: Development of the site could raise issues with designated heritage assets due to their proximity; landscape due to proximity to SDNP; transport as although the site has good public transport access, the site's location on the edge of the city and in close proximity to the A27 could influence travel choice; noise due to levels of road and rail noise; and climate change adaptation as would result in urbanisation of a site which currently comprises green infrastructure. The site is located within a sensitive groundwater source protection zone (2) and also has low and high risk of surface water flooding and risk of groundwater flooding. All services are located some distance from the site, although this is unlikely to be an issue for an employment allocation and it is recognised that the health facilities could be delivered on site.</p> <p>Potential positive effects: Development of the site for employment/health/education uses would have positive impacts for the local economy as would increase land supply in employment uses as well as potentially land for other uses which are significant employers in the city. Delivery of health services in this location would increase provision, which is lacking in this location. Development of an un-developed site would help to make better use of the site and may help support community safety in this location by providing active uses and passive surveillance. The site is within a SOA with high levels of skills deprivation; employment development could therefore provide opportunities to increase skills and access to employment. The site is also within the Brighton Paddock Field heat cluster opportunity area and could have potential to connect to a heat network if in place.</p>
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## H1 Housing Site Allocations

### Residential Site Allocations

#### SA site assessment: Former St Aubyn's School, 76 High Street, Rottingdean, Brighton, BN2 7JN

<b>Site Description</b>	A mixed site, comprising the former St Aubyn's School campus with various buildings (D1) some of which are listed, and the playing fields set within the centre of Rottingdean.
<b>Site Area</b>	3.4ha comprised of 0.86 school campus and 2.54 playing fields
<b>Current Use</b>	Vacant
<b>Potential Use</b>	Potential for 48 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	--	Site does not contain any nature conservation designations, however site within Impact Risk Zone for Black Rock to Newhaven Cliffs SSSI, although residential development is not restricted within this zone. Site includes substantial playing fields and could be considered partially greenfield in nature and may have some potential for biodiversity interest. Site includes some trees subject to a TPO.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	Site includes an area of private owned open space which is not publically accessible. Development could result in loss of open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is prominent and visible from the SDNP (Beacon Hill), however site is viewed within an existing urban context.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site contains Grade II listed buildings and various curtilage listed buildings. Part of site which contains the school buildings is situated within the Rottingdean Conservation Area. The playing fields are an important part of the setting of the conservation area (Rottingdean Conservation Area Character Statement). Part of site within Rottingdean ANA. Development of site could result in loss/deterioration of these assets and their settings.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve	++	Very good access to regular bus services. Shops, schools and opportunities for recreation all within walking distance.

travel choice.		
6. To reduce air and noise pollution.	-	Site boundary is in very close proximity to AQMA. Likely that access to the site would require travel through the AQMA. Amount of vehicle movements generated by development provided 48 dwellings may have an effect on air quality. Parts of site subject to road noise exceeding 55dcbLs which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL/greenfield in nature. Site is situated in Flood Zone 1. Small part of site (around the school campus) (<25%) have low risk of surface water flooding. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not in close proximity to a heat network cluster.
10. To increase the city's resilience and ability to adapt to climate change.	-	Although site includes an existing urbanised area, a large part of the site is open space which will perform some greenfield functions, e.g. temperature regulation and absorption of water. Development of the site could result in loss of some of the open space, which could adversely impact upon climate change adaptation. However some "greenfield" functions could be retained, e.g. through landscaping/SUDS.
11. To improve soil quality	+	Studies undertaken as part of previous planning applications indicate potential for contamination which would require remediation.
12. To minimise and sustainably manage waste	+	Development on parts the site is likely to facilitate adaptive re-use of some of the existing buildings which would help to preserve resources, however is also likely to result involve use of new resources.
13. To make the best use of land available.	+	Although development to provide 48 units may not meet the density targets in the CPP1, development at this level may be more acceptable given the density of the surrounding area. Redevelopment may help to facilitate adaptive re-use of some existing buildings, and help bring them back into use. Development may also retain some of the greenfield functions associated with the playing fields.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 48 dwellings could be delivered on site. This should include 40% affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	+	The site has good access to majority of services. Various services in desirable walking distance including shops (<50m), primary schools (<400m), open space (<300m). Secondary schools within acceptable walking distance. However health facilities at preferred maximum (1,150).
16. To improve health and well-	+	The site has good access to majority of services. Various services in desirable walking distance including shops

being, and reduce inequalities in health.		(<50m), primary schools (<400m), open space (<300m). Secondary schools within acceptable walking distance. However health facilities at preferred maximum (1,150). Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however it is accepted that the site is not publically accessible and is also in close proximity to other sources of open space. Site could suffer from air and noise quality issues which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is safely accessible by limited number of transport modes. Site located within 50% most deprived crime domain. Site may provide opportunities for community interaction/passive surveillance (e.g. through shared landscaped areas/open spaces).
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable housing. If 48 dwellings are provided, this could include 19 affordable units. Site not near to any areas of education or employment deprivation and therefore may not provide opportunities to reduce deprivation of nearby communities.
19. To contribute towards the growth of a sustainable and diverse economy...	0	Site not previously in employment uses, although it is recognised that the school would have provided jobs when it was open. Site identified for housing.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise issues with the following objectives: SDNP due to its location within an existing urban context; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; access and health due to good proximity to most services; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity/geodiversity as site within the Impact Risk Zone for the SSSI, includes some protected trees and may have potential for biodiversity due to open space on site. Development of site likely to result in loss of open space. Development could raise issues with heritage assets which are present on site, including archaeology. Site adjacent to AQMA and any traffic to/from the site would need to travel through the AQMA. Part of site suffers from high levels of road noise which may impact upon residential amenity. Site has small area at low risk of surface water flooding. Development of open spaces within the site may impact upon climate change adaptation. Site not located in close proximity to a heat cluster.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 48 dwellings are provided this should include some affordable units. Development likely to involve remediation of known areas of contaminated</p>

		land, improving soil quality. Although provision of 48 dwellings may not meet CPP1 minimum density targets, development may involve conversion of some of the existing buildings which helps to make the best use of land/resources as well as minimises waste. Development could retain land providing natural/greenfield functions such as open space offering potential for community interaction and thus supporting community safety, SUDS and flood prevention measures having wider environmental benefits. If some open spaces on site are retained as such and made publically available, this would result in an increase in publically accessible open space.
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### SA site assessment : Land between Marine Drive and to the rear of 2-18 The Cliff, Brighton

<b>Site Description</b>	A greenfield site designated as open space, within the built up area boundary, adjoining an area of predominantly residential uses. The site forms part of a green strip that runs alongside the A259 extending from Brighton to Rottingdean
<b>Site Area</b>	0.94ha
<b>Current Use</b>	Designated open space (natural/semi-natural typology)
<b>Potential use</b>	Potential to deliver 16 housing units (although could be higher if restrictive covenant removed). Site does not have a planning consent.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site is a greenfield site with potential for some biodiversity interest. Some BAP species recorded on site. Site a proposed LWS. Site likely to be within Impact Risk Zone for Black Rock to Newhaven SSSI, however as this designation is predominantly geological, this is not considered to pose a risk of significant adverse effect for biodiversity.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Development of site would result in loss of publically accessible open space of natural/semi-natural typology.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site in fairly close proximity to SDNP and development could be visible from SDNP possibly having landscape impacts. However site situated within an urban context, including being within close proximity to tall buildings which is likely to limit significant visual impacts.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes,	-	Site is not within or adjacent to any designated heritage assets, however is within the Roedean ANA and development could have impacts on archaeology.

buildings and archaeological sites.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	The site has fairly good access to a frequent bus service and to a local centre (c.500m). However does not have close access to secondary schools or health facilities and is located in an area of the city where the car is likely to be the preferred mode of transport.
6. To reduce air and noise pollution.	-/++	Site not within AQMA and development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality. However, site adjacent to A259 and subject to road noise exceeding 55 dcbls which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	Greenfield site. Within flood zone 1. No flooding incidents on site. No risk of surface water flooding on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within close proximity to Brighton Marina heat network opportunity area and could have potential to connect to a heat network. Site could also have potential to incorporate low/zero carbon infrastructure.
10. To increase the city's resilience and ability to adapt to climate change.	-	Development of greenfield sites into an urbanised form can increase risk of flooding/urban heat island effect. However, this site offers the possibility of retaining some greenfield functions, such as water absorption and temperature regulation i.e. if some open spaces retained on site (e.g. through a low-density scheme).
11. To improve soil quality	0	Site is not known to be contaminated. Site does not contain any agricultural land.
12. To minimise and sustainably manage waste	0	Greenfield site/open space with no building on site.
13. To make the best use of land available.	+	Site is greenfield. If the site delivers 16 units, this will provide a dwelling density of 17dph, less than the 50dph expected through CPP1 CP14. However, a low density scheme may provide the opportunity to retain some greenfield functions as well as open space on site which would have wider benefits.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 16 dwellings could be delivered on site (restricted by a legal covenant). This should include 40% affordable housing and may be a site which could provide an element of family housing.
15. To improve the range, quality and accessibility to services and facilities.	+	Some services considered to be within acceptable walking distance including shops (c.400m), primary school (c.1,050m) and open spaces (c.350m); however some more than preferred maximum including health (c.1,300m) and secondary schools (c.4,100m). In addition, opportunities to walk/cycle to some facilities could be limited due to topography and/or volume of road traffic.
16. To improve health and well-being, and reduce inequalities in health.	+	Some services considered to be within acceptable walking distance including shops (c.400m), primary school (c.1,050m) and open spaces (c.350m); however some more than preferred maximum including health

		(c.1,300m) and secondary schools (c.4,100m). In addition, opportunities to walk/cycle to some facilities could be limited due to topography and/or volume of road traffic. Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being although it is recognised the site has good access to other opportunities for recreation. Site could suffer from noise issues which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is safely accessible by limited number of transport modes. Site situated within 30% most deprived SOA (crime). Site may provide opportunities for community interaction (e.g. open space?) although is unlikely to support a wider range of uses.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy .	0	Site is identified for housing only.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: designated heritage assets as none or near site; air quality as site located outside the AQMA; water quality as site located outside a GSPZ; flood risk as there is no risk of tidal/fluvial/surface water flooding on site; soil quality as site unlikely to be contaminated; access as some services are located in walking distance from the site; economy as development would not result in loss of employment land. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with biodiversity (due to greenfield nature of site and proposed LWS), loss of open space, landscape due to proximity to SDNP, archaeology as site within ANA, and climate change adaptation as would result in urbanisation of a greenfield site. In addition, road noise is an issue on the site. Site is located in an area where the car may be the preferred mode of transport. Loss of open space could also impact upon health, as could adjacent road noise.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 16 housing units are provided, this should include 40% affordable and the site may be suitable for family-type housing. Although delivery of 16 housing units would provide a site density of 17dph which is less than 50dph expected by CP14, and may not make the best use of the land, this may enable some greenfield functions/ecosystem services to be retained on sites, such as open space offering potential for community interaction and thus supporting community safety, SUDS</p>

		and flood prevention measures having wider environmental benefits. However it is noted that a higher density scheme may also provide the opportunity to retain some greenfield functions, depending on the type of development delivered and would have greater benefits for housing provision. The site may provide opportunities to incorporate low/zero carbon infrastructure and development may provide employment/training for adjacent deprived communities.
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**SA site assessment : 25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton, BN1 4QL**

<b>Site Description</b>	A brownfield site with existing commercial premises, located behind a residential street and adjacent to the London Road Railway Viaduct, within close proximity to the commercial/retail activity of Beaconsfield Road and London Road.
<b>Site Area</b>	0.09ha
<b>Current Use</b>	“Beaconsfield Workshops and Studios” providing workspace. In use and occupied by various businesses (B uses).
<b>Potential use</b>	Potential to deliver 15 housing units and potentially other uses within a mixed use scheme

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
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. Site could offer potential for nature conservation enhancement through redevelopment of the site.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	No open space on site. Site will not result in loss of open space and unlikely to result in increase in open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site immediately adjacent to Grade II* listed London Road Railway Viaduct.

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops, health facilities and opportunities for recreation all less than 300m and within walking distance. Site may be able to deliver an element of low-car/car-free housing.
6. To reduce air and noise pollution.	-/+	Site not within but adjacent to AQMA however access to site could be gained without travelling through the AQMA. Development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality. Site subject to railway noise and road noise exceeding 55 dcbLs which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ.
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. None of site has any risk of surface water flooding however site could have risk of groundwater flooding as groundwater levels between 0.5m and 5m below ground surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within or proximity to a potential heat network cluster.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is PDL. Development of site could provide opportunity to increase green infrastructure and support climate change adaptation.
11. To improve soil quality	?	Unknown whether site has potential for contamination, based on current/former uses.
12. To minimise and sustainably manage waste	-	There may be potential to make use of some existing resources (building) on site however re-development likely to result in use of natural resources.
13. To make the best use of land available.	+	PDL site currently in use. Site capable of delivery minimum density targets set by CPP1 (>100dph in Development Areas) and would achieve c.166dph if provided 15 dwellings.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 15 dwellings could be delivered on site. This should include 40% affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Most situated within desirable walking distance including shops (c.110m), primary school (c.730m), health (c.270m) and open spaces (c.300m). Secondary school within reasonable walking distance (c. 1650m).
16. To improve health and well-being, and reduce inequalities in	+	Services within a desirable walking distance, including health and opportunities for activity. The site could suffer from air and noise quality issues which could impact upon amenity and health.



health.		
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible currently by range of different transport modes. Potential site use may support a range of uses, which could provide passive surveillance. Site located in 50% most deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy	-/+	Site currently in employment uses however ability to increase/improve potential in current form may be limited. Redevelopment of site as a mixed use scheme may provide the opportunity to improve workspace, though could result in a net loss of employment floorspace.
<b>Overall Summary and Policy Considerations</b>	mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations of BAP habitats/species and may provide opportunities to provides net gains; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; air quality as not located within the AQMA and access to site could be gained without travelling through the AQMA; water quality as site not within GSPZ; tidal or surface water flood risk as site not at risk of these types of flooding; climate change adaptation as site is entirely on urbanised PDL; access and health due to proximity to services.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with adjacent heritage assets. Development could result in net loss of employment land, even if a mixed use scheme is delivered. Future occupants of the site may be subjected to high levels of road traffic and railway noise. Development of site is unlikely to provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. It is unknown whether the site has any potential for contamination. Site is situated where groundwater levels are between 0.05 and 0.5m below ground surface and could be a t risk of groundwater flooding.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 15 dwellings are provided this should include some affordable units. Delivery of 15 units would provide a site density of 166dph which would help to make the best use of land. A scheme in this location has potential to be car-free. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Site could include other uses as part of a mixed use scheme which could provide passive surveillance and support community safety. The site may also provide employment/training opportunities for adjacent deprived communities</p>

**SA site assessment : 46-54 Old London Road, Patcham**

<b>Site Description</b>	Site consists of 5 detached dwellings (some privately owned) on a fairly prominent roadside location.
<b>Site Area</b>	0.46ha
<b>Current Use</b>	C3 residential use.
<b>Potential Use</b>	Potential to deliver 30 dwellings. No planning consent.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Although the site is classified as PDL, the site also includes extensive private residential gardens of an undeveloped nature. In addition, part of site contains an area of trees covered by a TPO.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses of publically accessible open space and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to and is unlikely to be within the setting of any heritage assets. Site not within a ANA. However, noted that boundary of Patcham Conservation Area and Patcham ANA both c.50 from site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	The site is situated within acceptable walking distance to local shops, schools and opportunities for recreation. Other services are located further away. However, site not situated within close proximity to a regular bus service with the nearest bus service running 3 times per hour. Site considered to be situated within an area where the car is the preferred mode of transport.
6. To reduce air and noise pollution.	-/++	Site not within AQMA and development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality. However, part of site subject to road noise exceeding 55 dcbIs which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Site located within GSPZ 1.

8. To reduce the risk from all sources of flooding to and from development	--	Flooding incident recorded on site. Low to medium risk of surface water flooding on parts of site. Adjacent to high risk area. Site may be at risk of groundwater flooding as GW levels between 0.5m and 5m below ground surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within or in close proximity to a potential heat network cluster.
10. To increase the city's resilience and ability to adapt to climate change.	-	Although the site is classed as PDL, a large proportion of the site is undeveloped and takes the form of residential gardens. Development of the site would result in loss of undeveloped land, however could provide the opportunity to retain some "greenfield" functions, e.g. through landscaping/SUDS.
11. To improve soil quality	0	Site is not known to be contaminated. Site does not contain any agricultural land.
12. To minimise and sustainably manage waste	--	Development of site is unlikely to make use of any of the existing buildings or resources on site.
13. To make the best use of land available.	+	PDL site currently in use. Site capable of delivering minimum density targets set by CPP1 (>50dph for development outside development areas) and would achieve c.65ph if provided 30 dwellings.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 30 dwellings could be delivered on site. This should include 40% affordable housing. Previous unsuccessful planning applications indicate a willingness to deliver housing for older people on site. Development of this site would result in a loss of existing housing on site however would result in an overall net gain if SHLAA amount delivered.
15. To improve the range, quality and accessibility to services and facilities.	+	Most services considered to be within acceptable walking distance including shops (c.400m), primary and secondary schools (c.640m) and open spaces/recreation (c.640m). Health services are located towards the preferred maximum walking distance (c.900m).
16. To improve health and well-being, and reduce inequalities in health.	+	Although health services are located at preferred maximum walking distance, other facilities, including opportunities for activity and outdoor sports are located within acceptable walking distance. The site could suffer noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is safely accessible by limited number of transport modes. Site located within 50% most deprived crime domain. Site may provide opportunities for community interaction/passive surveillance (e.g. through shared landscaped areas – based on previous planning applications).
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable units. Site could have potential to deliver housing for people with protected characteristics (older people) (based on previous applications). Site not adjacent to areas of high employment/education deprivation and may therefore not provide the opportunity to deliver jobs/skills for adjacent deprived communities.
19. To contribute towards the growth of a sustainable and diverse	0	Site identified for housing only. Site not in former employment uses.

economy increase employment opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>		<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: open space as site does not include designated open space; SDNP due to location within urban area; designated heritage assets as none on site; air quality as site located outside the AQMA; soil quality as site unlikely to be contaminated; access and health due to proximity to services; economy as development would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity: specifically protected trees; water pollution as is within GSPZ1; flood risk as risk of surface water flooding on site; and climate change adaptation as could result in urbanisation of a predominantly undeveloped site. The site is not within close proximity of a potential heat cluster. In addition, road noise is an issue on the site and the site does not have good access to frequent sustainable transport modes, which could impact upon how people travel. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 30 dwellings are provided, this should include 40% affordable and the site may provide housing for people with protected characteristics (older people) having positive equalities impacts. Delivery of 30 dwellings would provide a site density of 65dph which would help to make the best use of land. Development could retain land providing natural/greenfield functions such as open space offering potential for community interaction and thus supporting community safety, SUDS and flood prevention measures having wider environmental benefits.</p>

**SA site assessment : 60-62 & 65 Gladstone Place Brighton BN2 3QE**

<b>Site Description</b>	A brownfield site with existing commercial uses, situated within a residential area. In close proximity to Lewes Road mixed use area.
<b>Site Area</b>	0.16ha
<b>Current Use</b>	In use and occupied by music equipment distributor (GAK) (B1/B8 uses).
<b>Potential Use</b>	Potential to deliver 10 dwellings and potentially some employment uses.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site which does not contain any nature conservation designations. Although the site is immediately adjacent to an SNCI, it is unlikely that development will adversely affect the designation, due to high retaining wall which physically separates the sites and limits direct access. Redevelopment of the site may provide opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site immediately adjacent to Woodvale Cemetery Registered Park & Garden and Grade II Listed Building (123a Lewes Road) within Crematorium. Not within or adjacent to an ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services. Shops, health facilities and opportunities for recreation all less than 500m and within walking distance. Site may be able to deliver an element of low-car/car-free housing.
6. To reduce air and noise pollution.	-/+	Site adjacent to AQMA which includes Gladstone Place, and any traffic to and from the site would need to travel through the AQMA. However, development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality. Site not subject to high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within 1, 2 or 3 of a GSPZ.
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. Part of site has risk of surface water flooding. Site could have risk of GW flooding as GW levels between 0.5m and 0.5m below ground surface.
9. To reduce emissions of	-	Site not within or proximity to a potential heat network cluster.

greenhouse gases that cause climate change		
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is PDL. Development of site could provide opportunity to increase green infrastructure/SUDS.
11. To improve soil quality	+?	Unknown whether site has potential for contamination, but may have potential as historically an industrial site.
12. To minimise and sustainably manage waste	-	There may be potential to make use of some existing resources (building) on site however development likely to result in use of natural resources.
13. To make the best use of land available.	+	Site is PDL. Delivery of 10 units would achieve 62dph which is less than the minimum density expectations set in CP14 for Development Areas. However this density may be one that is more appropriate to the character of the neighbourhood including the adjacent Registered Park & Garden, as well as its location within a cul-de-sac location.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	SHLAA analysis indicates 10 dwellings could be delivered on site. This should include 30% affordable housing. A smaller range/mix of housing may be delivered due to the size of development.
15. To improve the range, quality and accessibility to services and facilities.	+	Fairly good access to majority of services. Primary schools within desirable walking distance (<600m). Various services within acceptable walking distance including shops (300m), health (500m), open space (400m) and secondary schools.
16. To improve health and well-being, and reduce inequalities in health.	+	Primary schools within desirable walking distance (<600m). Various services within acceptable walking distance including shops (300m), health (500m), open space (400m) and secondary schools. The site could suffer from noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible currently by range of different transport modes. Potential site use may support a range of uses, which could provide passive surveillance. Site located in 50% most deprived SOA (crime domain).
18. To increase equality and social inclusion	+	Site has potential to deliver 30% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-/+	Site currently in employment uses however ability to increase/improve potential in current form may be limited. Redevelopment of site as a mixed use scheme may provide the opportunity to improve workspace, though could result in a net loss of employment floorspace.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>mixed</p>	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations or BAP habitats/species and may provide opportunities to provides net gains; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; road noise; water quality as site not within GSPZ; climate change adaptation as site is entirely on urbanised PDL; access and health due to proximity to services.</p> <p>Potential adverse effects: Development of the site could raise issues with adjacent heritage assets including Registered Park and Garden and listed building. Site is adjacent to AQMA and any traffic to and from the site would need to travel through the AQMA. Delivery of 10 units would not achieve density requirements and therefore may not make the best use of land. Site could be at risk of surface water and ground water flooding. Development could result in net loss of employment land, even if a mixed use scheme is delivered. Development of site is unlikely to provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. The site is not in close proximity to a heat cluster.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 10 dwellings are provided this should include some affordable units. A scheme in this location has potential to be car-free. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. It is unknown whether the site has any potential for contamination but may have potential as historically an industrial site. Site could include other uses as part of a mixed use scheme which could provide passive surveillance and support community safety. The site may also provide employment/training opportunities for adjacent deprived communities</p>
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**SA site assessment: 76-79 & 80 Buckingham Road, Brighton, BN1 1RJ**

<p><b>Site Description</b></p>	<p>Vacant buildings consisting of a terrace of 4 mid-19<sup>th</sup> century 4 storey buildings (76-79) on Buckingham Road, and a separate 4 storey 1970's development (80) on the corner of Buckingham Road and Upper Gloucester Street .</p>
<p><b>Site Area</b></p>	<p>0.13ha</p>

<b>Current Use</b>	Vacant. Former D1 uses.
<b>Potential Use</b>	Approved planning application Bh2016/01766 to provide 24 dwellings and some D1 floorspace through conversion of 76-79 and demolition of 80 Buckingham Road.

**Assessment based on assumption that approved scheme will be implemented.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site; does not contain nor is adjacent to any nature conservation designations. Redevelopment of the site (particularly number 80) may provide opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	+	Development will not result in loss of open space but will not result in an increase in public open space. Noted that approval includes provision of a community garden for private use. Planning permission granted includes S106 contribution towards open space, which should result in improvements to open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Site within West Hill Conservation Area. Number 80 is cited as being detrimental to the character of the Conservation Area. 76-79 Buckingham Road – conversion of this terrace with improvements to the front elevation was supported on heritage grounds. 80 Buckingham Road – there was no objection on heritage grounds to the demolition of this building and replacement of a new modern building accepted provided it was sympathetic to the Conservation Area. Overall, development of this site has potential to conserve and potentially improve the Conservation Area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station and other services and facilities. Nb: planning consent does not allow parking permits to be gained by future residents, indicating car-free housing.
6. To reduce air and noise pollution.	+	Site not within but adjacent to AQMA. Access to site could be gained without travelling through the AQMA. Development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality particularly as planning consent has specified car-free housing. Road noise less than 55dcbls.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.



8. To reduce the risk from all sources of flooding to and from development	++	Within flood zone 1. No risk of surface water flooding on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	No opportunity to connect to a heat network as outside cluster area. Approved planning consent includes use of some renewable technologies including photovoltaics presumed to be suitable to be used in Conservation Areas.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site unlikely to be contaminated based on former uses and therefore does not provide opportunity to improve soil quality.
12. To minimise and sustainably manage waste	+	Redevelopment of large part of site, particularly through conversion of 76-79, will facilitate adaptive re-use of existing buildings and therefore helps to preserve resources.
13. To make the best use of land available.	++	Redevelopment of site provides opportunity to regenerate derelict and vacant buildings and make better use of the site. By providing 24 dwellings, a site density of 184dph would be achieved which meets CPP1 density requirements.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Planning consent given to provide a total 24 dwellings of a range of different types. Development of the site will involve a loss of 2 units, therefore the development will provide a net gain of 22 units. Of these, 9 affordable units and 2 wheelchair accessible units will be delivered as approved.
15. To improve the range, quality and accessibility to services and facilities.	++	The development includes unit for D1 community use which would help increase access to this use. It is noted that redevelopment also includes the loss of D uses, however it is noted that the former D uses (adult/day services) vacated the premises in 2015 due to the change in the way services are delivered. The site has good access to majority of services. Various services within desirable walking distance including shops (160m), health (260m), and primary schools (300m). Open space and secondary schools within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	The development includes unit for D1 community use which would help increase access to this use. It is noted that redevelopment also includes the loss of D uses, however it is noted that the former D uses (adult/day services) vacated the premises in 2015 due to the change in the way services are delivered. The site has good access to majority of services. Various services within desirable walking distance including shops (160m), health (260m), and primary schools (300m). Open space and secondary schools within acceptable walking distance. Site has good air quality and noise levels.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible by range of different transport modes. Development provides opportunity of increasing community interaction (provision of community garden within approved scheme). Site located in

		50% most deprived (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 2 wheelchair accessible units supporting the housing needs of people with protected characteristics. Site could provide employment/training opportunities for nearby areas of employment/education deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for predominantly housing. Site not previously in employment land uses (B1-B8) although it is recognised that the former D uses provided jobs. Small element of D use on site will provide space for health/community related employment.
<b>Overall Summary and Policy Considerations</b>	Positive	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations of BAP habitats/species and may provide opportunities to provides net gains; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; air quality as outside the AQMA and site can be accessed without travelling through the AQMA; road noise; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; soil quality as site unlikely to be contaminated; climate change adaptation as site is entirely on urbanised PDL; access and health due to proximity to services; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects: No adverse effects against any of the sustainability objectives were identified. This may change if a different scheme came forward.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 24 dwellings are to be provided, including 9 affordable units and 2 wheelchair accessible units, also having positive equalities impacts. Delivery of 24 dwellings would provide a site density of 184dph which would help to make the best use of land. The conversion of part of the site would improve appearance of these buildings and demolition of the other part of the site would remove a building that is considered to be detrimental to the surrounding Conservation Area</p>

		and should have positive impacts for heritage. Delivery of a car-free scheme on a site adjacent to the AQMA should ensure that vehicle movements are not increased, therefore not contributing towards air quality issues. The retention and conversion of buildings on part of the site helps to minimise waste through adaptive re-use. Provision of a community garden may provide opportunities for community interaction and supports community safety. Incorporation of LZC technologies helps mitigate against climate change. The site may also provide employment/training opportunities for adjacent deprived communities
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### SA site assessment: 87 Preston Road, Brighton

<b>Site Description</b>	A vacant locally listed building, located on a prominent position on Preston Road, formerly used by City College.
<b>Site Area</b>	0.14ha
<b>Current Use</b>	Vacant. Formerly used by city college for educational purposes (D1)
<b>Potential Use</b>	Approved planning application BH2017/01083 change of use and internal alterations to provide 25 apartments including communal garden space.

#### Assessment based on assumption that approved scheme will be implemented.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	0	PDL site; does not contain nor is adjacent to any nature conservation designations, nor does it contain any BAP habitats or species. Approved scheme does not include any features that could enhance nature conservation.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	+	Development does not result in loss of open space. Noted that approval includes provision of a communal garden for private use. Planning permission granted includes S106 contribution towards open space, which should result in improvements to open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and	++	Building is locally listed and within setting of Grade II* London Road Railway Viaduct and is near to two Conservation Areas. Heritage comments of approved scheme were largely supportive of the retention and re-use of the locally listed building and supportive of the demolition of a rear structure within the site boundary which was considered to enhance the setting of the locally listed building itself as well as the setting of the

archaeological sites.		listed viaduct. Therefore, redevelopment in accordance with the planning consent should enhance both designated and locally listed assets.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops and health facilities all within less than 310m and within walking distance. Approved scheme is car-free in that it does not include any vehicle parking spaces, and residents are ineligible for a parking permit.
6. To reduce air and noise pollution.	--	Site within AQMA and subject to high levels of road noise and railway noise which may impact upon future residential amenity. Noted that approved scheme is car-free and therefore should not increase vehicle movements in this location.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	PDL site consisting of largely impermeable surface. Entire site at low-medium risk of surface water flooding. Site may have potential for groundwater flooding as GW levels between 0.5m and 5m below ground surface. Noted that the approved scheme includes an enlarged area of permeable surfacing which will help to reduce surface water run-off.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site is not within an identified heat network opportunity area. Approved scheme does not include any renewable energy technologies although does include some measures to improve energy efficiency of existing building.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is on PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city. Noted that the approved scheme includes an enlarged area of permeable surfacing which will help to reduce surface water run-off and support climate change adaptation.
11. To improve soil quality	0	Site unlikely to be contaminated, based on former educational uses.
12. To minimise and sustainably manage waste	+	Redevelopment of site will facilitate adaptive re-use of buildings and therefore preserve resources.
13. To make the best use of land available.	++	Redevelopment of vacant/derelict site on PDL helps to make best use of land available. Redevelopment in accordance with planning consent will provide a site density of 187dph which meets CPP1 density requirements.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site will provide 25 dwellings which will include 40% affordable units. It is noted that the planning consent includes 1 wheelchair accessible unit.
15. To improve the range, quality	++	Site redevelopment does not provide opportunity to increase services and will result in loss of D1 floorspace in

and accessibility to services and facilities.		this location, however it is noted that this floorspace has been re-provided at a new training centre. The site has good access to majority of services. All services within desirable walking distance including shops (70m), health (310m), open space (150m), primary schools (750m) and secondary schools (1,460m).
16. To improve health and well-being, and reduce inequalities in health.	+	The site has good access to majority of services. All services within desirable walking distance including shops (70m), health (310m), open space (150m), primary schools (750m) and secondary schools (1,460m). The site could suffer from air and noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible by range of different transport modes. Development provides opportunity of increasing community interaction (provision of communal garden). Site located in 30% least deprived (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 1 wheelchair accessible units supporting the housing needs of people with protected characteristics. Site could provide employment/training opportunities for nearby areas of employment/education deprivation. Noted that planning consent includes s106 to contribute towards local employment scheme.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing. Site not previously in employment land uses (B1-B8) although it is recognised that the former D uses provided jobs, however presumed that these will be provided within new education facilities.
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; road noise; water quality as site not within GSPZ; soil quality as site unlikely to be contaminated; climate change adaptation as site is entirely on urbanised PDL; access and health due to proximity to services; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects: The site is situated within the AQMA, however it is noted that the approved scheme is car-free and so although it should not increase vehicle movements in this location, residents may be subjected to poor quality. The site is subject to high levels of road and railway noise, which could impact upon the amenity of future residents.</p>

		<p>The site is not within a heat network cluster area and although approved scheme includes measures to improve energy efficiency it does not contain and LZC technologies. The site has a risk of surface water flooding and could be susceptible to groundwater flooding.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. 25 dwellings are to be provided, including 40% affordable units and 1 wheelchair accessible unit, also having positive equalities impacts. Delivery of 25 dwellings would provide a site density of 187dph which would help to make the best use of land. The conversion of a locally listed building will help to restore this asset, and demolition of building within the site boundary would improve the appearance of the setting of adjacent listed building having positive impacts for heritage. Delivery of a car-free scheme on a site adjacent to the AQMA should ensure that vehicle movements are not increased, therefore not contributing towards air quality issues. The site has a risk of surface water flooding, however it is noted that approved scheme includes the enlargement of permeable surfacing within the site, which would help reduce this risk and supports climate change adaptation. The conversion of building helps to minimise waste through adaptive re-use. Provision of a communal garden may provide opportunities for community interaction and supports community safety. The site may also provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: 251-253 Preston Road, Brighton**

<b>Site Description</b>	Vacant site on PDL, consisting of two 3-4 storey Victoria villas linked by a later extension, set within substantial grounds. Although the site is on a fairly prominent roadside location, the site is screened considerably by trees. .
<b>Site Area</b>	0.5ha
<b>Current Use</b>	Vacant. Formerly used by BHCC Social Services as a children’s resource centre and had a sui generis use.
<b>Potential Use</b>	Approved planning consent BH2016/00403 to demolish link building and erect new extension and convert existing villas to provide 22 apartments, and erect terrace to the rear to provide 6 single dwellings along with communal and private garden space.

**Assessment based on assumption that approved scheme will be implemented.**

SA Objective	Score	Commentary
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1. To protect, conserve and achieve a net gain in biodiversity.	-	Although this is a PDL site which does not contain or adjacent to any nature conservation designations, part of the site contains trees subject to a TPO and many mature trees are within the grounds. Noted from the development proposals/planning consent that only 2 of the 27 trees within the TPO are likely to be removed, and that a total of 36 trees would be removed in total.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	+	Development does not result in loss of public open space. Noted that approval includes provision of a communal garden for private use, as well as some individual private gardens for some properties. Planning permission granted includes S106 contribution towards open space, which should result in improvements to open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Site is within a Conservation Area however is not featured as a notable building within the CA Character Statement. Heritage comments concluded that the terraced housing is situated so that the historic setting of the villas is retained. Heritage comments highlighted concern about the appropriateness of linking the two villas which result in a terracing effects and could be harmful, however trees retained at the front of the site along Preston Road would help to screen the retained villas and new link building.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops and some other facilities within 470m of site and within walking distance. It is noted that the approved scheme include provision of 30 car-parking spaces and 45 cycle parking spaces and is therefore not car free, however is considered unlikely to result in a significant change to transport movements when compared with its previous use.
6. To reduce air and noise pollution.	-/++	Site located outside the AQMA. However site adjacent to A23 and subject to high levels of road noise exceeding 55dcbLs which varies across the site and could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	PDL site, with approximately half the site having a low-medium risk of surface water flooding (mainly covered by area of hard-surfacing) and a small portion of the site having a high risk of surface water flooding. Groundwater levels also between 0.5m and 0.5m below ground surface therefore there could be a risk of GW

		emergence. Approved scheme includes infiltration SUDS to manage surface water runoff and ensuring that a fall away from the buildings to the highways is maintained.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not located within a heat network opportunity area however it is noted that the approved scheme includes solar PV panels on the new-build elements of the scheme and includes measures to improve energy efficiency of retained/converted buildings.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL with extensive grounds, a large proportion of which are being retained in the approved scheme. Approval also includes infiltration SUDS that will support climate change adaptation through reducing flood risk.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	+	Although the approved scheme will result in some demolition and use of natural resources, the scheme does facilitate the adaptive re-use of some of the existing buildings on site.
13. To make the best use of land available.	++	Redevelopment of vacant/derelict site on PDL helps to make best use of land available. Redevelopment in accordance with planning consent will provide a site density of 56dph which meets CPP1 density requirements.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Approved consent will provide 28 dwellings, of which 11 will be affordable and 2 will be wheelchair accessible.
15. To improve the range, quality and accessibility to services and facilities.	+	The site has good access to some services. Services within desirable walking distance include convenience store (200m), open space (470m), primary schools (100m) and secondary schools (870m). Health facilities located just over acceptable walking distance for this type of service (900m).
16. To improve health and well-being, and reduce inequalities in health.	+	The site has good access to some services. Services within desirable walking distance include convenience store (200m), open space (470m), primary schools (100m) and secondary schools (870m). Health facilities located just over acceptable walking distance for this type of service (900m). The site could suffer from noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible by range of different transport modes. Development provides opportunity of increasing community interaction (provision of communal garden). Site located in 50% most deprived (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 2 wheelchair accessible units supporting the housing needs of people with protected characteristics. Site not located near to areas of employment/education deprivation. Noted that planning consent includes s106 to contribute towards local employment scheme.
19. To contribute towards the growth of a sustainable and diverse economy increase employment	0	Site identified for housing. Site not previously in employment land uses (B1-B8) although it is recognised that the former use provided jobs, however presumed that these will be provided elsewhere in the city.



opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; air quality as site located outside the AQMA; water quality as site not within GSPZ; soil quality as site unlikely to be contaminated; access and health due to proximity to services; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity – through loss of trees including some with a TPO. The site is subject to high levels of road noise, which could impact upon the amenity of future residents. Site has risk of surface water and ground water flooding.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 28 dwellings are to be provided, including 11 affordable and 2 wheelchair accessible, also having positive equalities impacts. Delivery of 28 dwellings would provide a site density of 56dph which would help to make the best use of land. The terraced element of the scheme helps to retain the historic setting of the villas, and the retention of trees at the front of the site helps screen the building from the surrounding Conservation Area, reducing the likelihood of adverse visual effects. The conversion of the villas helps to minimise waste through adaptive re-use and also helps to make the best use of land. The site has a risk of surface water flooding, however it is noted that approved scheme includes some SUDS which should help reduce flood risk and supports climate change adaptation. Provision of a communal garden may provide opportunities for community interaction and supports community safety. Incorporation of LZC technologies helps mitigate against climate change. Development on the site may also provide employment/training opportunities for adjacent deprived communities.</p>

**SA site assessment: Eastergate Road Garages Site, Moulsecoomb**

<b>Site Description</b>	A brownfield site, comprising cleared/derelict land as well as 2 garages which are in-use, situated adjacent to an industrial estate and residential area.
<b>Site Area</b>	0.07ha
<b>Current Use</b>	Cleared garage site, with 2 remaining garages in use.
<b>Potential Use</b>	Site has potential for 24 units of modular-type housing

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site; does not contain nor is adjacent to any nature conservation designations and does not contain any BAP habitats. Redevelopment of the site may provide opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is fairly close proximity to SDNP, boundary 180m, however site is well screened by existing development and would be within an existing urban context.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to, or within the setting of any designated heritage assets and has no potential for archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	The site has very good access to regular buses, however access to other local services varies. Site may be located in an area where care is the preferred mode of transport (e.g. close proximity to the SRN).
6. To reduce air and noise pollution.	++	Site situated outside the AQMA and away from roads which generate high levels of road noise. Site use unlikely to generate significant amounts of traffic.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site within GSPZ 2.

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. Site has risk of surface water flooding.
9. To reduce emissions of greenhouse gases that cause climate change	--	The site is not within a heat network opportunity area. It is unknown whether modular type housing will have any potential to incorporate any low/zero carbon technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site is considered to have potential for contamination and would therefore provide the opportunity to remediate contaminated land and improve soil quality.
12. To minimise and sustainably manage waste	--	Former garage site therefore no potential to make use of any of the buildings on site.
13. To make the best use of land available.	++	Development of the site would provide the opportunity to make better use of a predominantly cleared/vacant/derelict site. If 24 units of housing are delivered, this would give a site density of 342dph which far exceeds density requirements in CPP1.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could provide 24 units of modular-type housing. BHCC has agreed to lease the site to YMCA, which will build the housing to rent to young people. This is delivered as part of the New Homes for Neighbourhoods scheme, which provides new council homes for rent, therefore will be affordable.
15. To improve the range, quality and accessibility to services and facilities.	+	The site is within desirable walking distance to open space (park - 400m), primary school (500m) and secondary schools (1,000m). The nearest health facilities are at preferred maximum walking distance (1,100m). Nearest and local/town centre is more than preferred maximum walking, although it is recognised that there is a convenience store near the site.
16. To improve health and well-being, and reduce inequalities in health.	+	The site is within desirable walking distance to open space (park - 400m), primary school (500m) and secondary schools (1,000m). The nearest health facilities are at preferred maximum walking distance (1,100m). Nearest and local/town centre is more than preferred maximum walking, although it is recognised that there is a convenience store near the site.
17. To improve community safety, and reduce crime and fear of crime.	-	Site located within SOA that is within the 20% most deprived in the crime domain. Opportunities to design out crime should be maximised. Redevelopment of a derelict/under-used site may help to reduce the risk of anti-social behaviour from occurring on the site.
18. To increase equality and social inclusion	++	The site has approval to provide housing for younger people, who are a group with protected characteristics. The site is located within the 10% most deprived education and 20% most deprived employment domain and therefore could provide opportunities to reduce deprivation through improving skills/providing employment

		opportunities for local and adjacent deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing. Redevelopment of site will not result in any loss of employment land or jobs on site.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as site does not contain any heritage designations or archaeological potential; air quality/road noise as site not within AQMA nor is subject to high levels of road noise; transport as site has good access to public transport and has fairly good access to most services; climate change adaptation as site entirely PDL; economy as development would not result in loss of employment land.</p> <p>Potential adverse effects: The site is within a GSPZ and construction could pose a risk to water quality. The site is not within a heat network opportunity area and it is unknown whether modular housing will provide the opportunity to include low/zero carbon technologies, impacting upon climate change mitigation. The site has a risk of surface water flooding. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing, particularly as all units would be affordable delivered through new homes for neighbourhoods scheme. If 24 dwellings are provided this would equate to a site density of 342dph, and would bring partially vacant site into use, being a good use of under-used land. The site should provide housing for people with protected characteristics (younger people) benefitting equalities. The site has been identified as having potential for contamination, which would require remediation and result in an improvement to soil quality. Development of the PDL site could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The site could provide employment/training opportunities for adjacent deprived communities.</p>

**SA site assessment: Land between Manchester Street/Charles Street, Brighton**

<b>Site Description</b>	A PDL in-fill site within the city centre, currently in use as a surface-level private car-park, in close proximity to the seafront.
<b>Site Area</b>	0.06ha
<b>Current Use</b>	Private car-park
<b>Potential Use</b>	Potential for 24 dwellings. May also have potential for other uses, e.g. B1 employment or D2 entertainment.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site within East Cliff Conservation Area. Some listed buildings in close proximity to site including some Grade II listed buildings on Charles Street and Manchester Street. Development of site could therefore result in deterioration of these assets, although it is accepted in its current state, the site is likely to detract from the conservation area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services. Shops and health facilities within close walking distance. Site likely to be able to deliver an element of low-car/car-free housing.
6. To reduce air and noise pollution.	--	Site located entirely within the AQMA. Site located within an existing streetscape that may prohibit pollution dispersal. Any traffic travelling to the site would need travel through the AQMA. Development of site could generate change in average vehicle flow which would significantly impact upon air quality in this location depending (e.g >100 annual average daily total light vehicle movements).

		Part of site subject to road noise levels exceeding 55dcbLs. Although the proposed use of the site is predominantly residential, which in itself is unlikely to generate significant noise, it is noted that the site is adjacent to a night-club and in close proximity to other uses which may generate noise at evening/night-time. This would need careful consideration to protect the amenity of future occupiers on site, but also to protect the existing adjacent uses and enable them to operate.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within 1, 2 or 3 of a GSPZ.
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. None of site has any risk of surface water flooding. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within or proximity to a potential heat network cluster.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	?	Unknown whether site has potential for contamination. Unknown what previous uses prior to car-park involved.
12. To minimise and sustainably manage waste	0	There are no buildings on site or resources that could be reused.
13. To make the best use of land available.	++	Development of the site would provide the opportunity to make better use of a predominantly derelict site. If 24 units of housing are delivered, this would give a site density of 400dph which far exceeds density requirements in CPP1.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 24 units of housing could be delivered. This should include 40% affordable.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Most services within desirable walking distance including primary school (580m), shops (<50m), health (230m); recreation (650m). Secondary schools towards preferred maximum distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Good access to majority of services. Most services within desirable walking distance including primary school (580m), shops (<50m), health (230m); recreation (650m). Secondary schools towards preferred maximum distance.

		The site could suffer from air and noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	-	Site can be safely and easily accessed and site may offer potential to provide a mix of uses which could provide passive surveillance/interaction. However site located within 10% most deprived SOA crime domain. Opportunities to design out crime should be maximised. Redevelopment of a derelict/under-used site may help to reduce the risk of future anti-social behaviour from occurring on the site.
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
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 other job opportunities if other uses are delivered.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site entirely PDL; access and health due to proximity to services; economy as development would not result in loss of employment land. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential adverse effects: Development of the site could raise issues with adjacent heritage assets (listed buildings) and also the conservation area within which the site is situated, although it is accepted in its current state, the site is likely to detract from the conservation area. Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is subject to high levels of road noise, and is also adjacent to uses that generate night-time noises, including a night-club, which may not be compatible with residential uses. It is unknown whether the site has any potential for contamination or whether low/zero carbon infrastructure could be incorporated on site and the site is not located within a heat network cluster area. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p>

		<p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 24 dwellings are provided this should include some affordable units and would equate to a site density of 400dph, would bring an under-used into more productive use and help to make better use of land resources. A scheme in this location has potential to be car-free. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The site may help to deliver employment floorspace if other uses are also provided, as well as other jobs and may also provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: Baptist Tabernacle, Montpelier Place, Brighton**

<b>Site Description</b>	A modern single storey brick church (c.1960s) with an internal gated courtyard occupying the corner of York Terrace, Montpelier Place and Norfolk Terrace.
<b>Site Area</b>	0.09ha
<b>Current Use</b>	Vacant church (derelict)
<b>Potential Use</b>	24 dwellings and 115sqm D1 community uses.

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain any nature conservation designations and does not support protected species. Development of site offers potential for nature conservation enhancement and approved scheme incorporates a green roof.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Site will not result in either losses nor gains in public open space, although it is noted that the individual dwellings contain private gardens.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's	++	Within Montpelier & Clifton Hill Conservation Area. Opposite Brunswick Town Conservation Area.



historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.		Listed buildings adjacent to and opposite site including Grade II listed Abbey Hotel and Grade II listed Belvedere Terrace. Locally listed building (Mercia House) opposite site. Heritage consultation comments suggest the current site does not make a positive contribution to the conservation area or setting of neighbouring conservation area and the derelict appearance detracts from the areas. Redevelopment of the site, in accordance with the approved consent, would make a positive contribution to the conservation area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	The site has very good access to regular bus services and there is a range of essential services nearby and within walking distance. NB: planning consent incorporates 7 on-site parking spaces as well as cycle parking.
6. To reduce air and noise pollution.	++	Site located outside AQMA and unlikely to generate an increase in vehicle movements that would have a significant effect on air quality. Road noise less than 55dcbLs and not an issue.
7. To improve water quality (ecological, chemical and quantity status)	++	Not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and has no risk of flooding from any source. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	No opportunity to connect to a heat network as outside cluster area. Approved planning consent includes use of some renewable technologies including photovoltaics and the energy strategy submitted includes a commitment to achieve the CP8 target of 19% improvement over Part L.
10. To increase the city's resilience and ability to adapt to climate change.	++	PDL site. Approved consent includes a green roof, which will increase green infrastructure and support climate change adaptation.
11. To improve soil quality	0	Site unlikely to be contaminated based on former uses and therefore does not provide opportunity to improve soil quality.
12. To minimise and sustainably manage waste	--	No potential to make use of the existing building on site.
13. To make the best use of land available.	++	Redevelopment of site provides opportunity to regenerate derelict and vacant buildings and make better use of the site. By providing 24 dwellings, a site density of c185dph would be achieved which meets CPP1 density requirements.

14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Planning consent given to provide a total 24 dwellings of a range of different types. Of these, 5 affordable units and 1 wheelchair accessible units will be delivered as approved.
15. To improve the range, quality and accessibility to services and facilities.	++	The development includes a unit for D1 use which would help increase access to this use. It is noted that redevelopment includes the loss of D1 uses (the church) which may have provide facilities for the wider community. The site has good access to the majority of services. Various services within desirable walking distance including shops (170m), health (400m), open space (420m) and primary schools (450m). Secondary schools within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	The development includes unit for D1 community use which would help increase access to this use. It is noted that redevelopment also includes the loss of D uses, however it is noted that the former D uses (adult/day services) vacated the premises in 2015 due to the change in the way services are delivered. The site has good access to majority of services. Various services within desirable walking distance including shops (160m), health (260m), and primary schools (300m). Open space and secondary schools within acceptable walking distance. Site has good air quality and noise levels.
17. To improve community safety, and reduce crime and fear of crime.	++	Site located in 50% most deprived (crime domain). Site is safely and easily accessible by range of different transport modes.
18. To increase equality and social inclusion	+	Site will deliver some on-site affordable housing and will make an off-site contribution, and deliver 1 wheelchair accessible units supporting the housing needs of people with protected characteristics. Site within 30% most deprived SOA (employment) and 30% least deprived SOA (education) and development could therefore provide employment/training opportunities for locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for predominantly housing. Small element of D use on site will provide space for health/community related employment.
<b>Overall Summary and Policy Considerations</b>	Mainly positive	The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.  No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations of BAP habitats/species and may provide opportunities to provides net gains; open space as site does not include

	<p>designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services and limited on-site parking provision; air quality as outside the AQMA; road noise; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; soil quality as site unlikely to be contaminated; climate change adaptation as site is entirely on urbanised PDL and will increase green infrastructure; access and health due to proximity to various services; community safety as not situated in an area of high crime; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site will involve demolition of the existing building and will not provide the opportunity to adapt the existing building or save resources.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 24 dwellings are to be provided, including 5 affordable units and 1 wheelchair accessible unit, also having positive equalities impacts. Delivery of 24 dwellings would provide a site density of 185dph which would help to make the best use of land. The demolition of the existing building and redevelopment of the site as approved would remove a building that does not contribute positively to the Conservation Area and should have positive impacts for heritage. Incorporation of a green roof results in net gains for biodiversity and supports climate change adaptation. Incorporation of LZC technologies helps mitigate against climate change. The site could provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: Preston Park Hotel, 216 Preston Road, Brighton**

<b>Site Description</b>	A two storey hotel situated on a prominent position on Preston Road, formed of a pair of Villas dating from the late 19 <sup>th</sup> century which has been extended and altered over time.
<b>Site Area</b>	0.25ha
<b>Current Use</b>	Hotel (in use)
<b>Potential Use</b>	22 flats delivered through demolition of 1970s extension, and extensions and alterations to retained building. (Approved planning consent Bh2015/04536.)

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve	0	PDL site. Development of site would result in neither losses nor gains for biodiversity and would have no impact

a net gain in biodiversity.		upon designated sites. The approved application does not include any measures to enhance nature conservation which could be incorporated into the scheme to provide a more positive result.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Within Preston Park Conservation Area. The building is not featured as a notable building within the Conservation Area Character Statement. Redevelopment of the site, in accordance with the approved consent, is considered to deliver substantial improvements to the appearance of the site and make a positive contribution to the conservation area street scene
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops and some other facilities within 470m of site and within walking distance. It is noted that the approved scheme include provision of 23 car-parking spaces and 42 cycle spaces and is therefore not car free, however is considered unlikely to result in a significant change to transport movements when compared with its current use.
6. To reduce air and noise pollution.	++/-	Site located outside AQMA and unlikely to generate an increase in vehicle movements that would have a significant effect on air quality. However site adjacent to A23 and subject to high levels of road noise exceeding 55dcbL which varies across the site and could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	PDL site. All of the hard-standing around the hotel building has varying risk of flooding, from low-high. GW levels between 0.5m and 5m below surface which may increase risk of groundwater emergence. Approved scheme seeks to install attenuation SUDS to manage surface water and reduce flood risk.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not located within a heat network opportunity area. No LZC technologies are proposed in the scheme. Development includes demolition and extension, which will be required to meet CP8 requirements and conversion, which would not be required to meet any standards. However it is noted that the development includes energy efficiency measures such as improved glazing and internal insulation.

10. To increase the city's resilience and ability to adapt to climate change.	+	PDL site which consists of building and expanse of impermeable hard-surfacing. Development will not result in loss of green infrastructure or an increase in hard-surfacing, therefore redevelopment will not increase the risk of impacts associated with climate change. Redevelopment of the site will incorporate attenuation SUDS which will reduce flood risk.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	+	Although the approved scheme will result in some demolition and use of natural resources, the scheme does facilitate the adaptive re-use of the majority of the existing buildings on site.
13. To make the best use of land available.	+	Site is not currently derelict or vacant and is in use as a hotel. Conversion to residential will help to facilitate adaptive re-use of existing buildings. Redevelopment to provide 25 dwellings would provide a site density of 100dph which meets CP1 minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Approved consent will provide 22 dwellings, of which 9 will be affordable and 1 will be wheelchair accessible (to be secured by condition).
15. To improve the range, quality and accessibility to services and facilities.	+	The site has very good access to some services. Services within desirable walking distance include convenience store (200m), open space (470m), primary schools (90m) and secondary schools (820m). Health facilities located just over acceptable walking distance for this type of service (900m).
16. To improve health and well-being, and reduce inequalities in health.	+	The site has very good access to some services. Services within desirable walking distance include convenience store (200m), open space (470m), primary schools (90m) and secondary schools (820m). Health facilities located just over acceptable walking distance for this type of service (900m). Site will not result in loss of open spaces, is not within a AQMA, although does have high levels of road noise.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible by range of different transport modes. Site located in 50% most deprived (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 1 wheelchair accessible unit supporting the housing needs of people with protected characteristics. Site not located near to areas of employment/education deprivation. Noted that planning consent includes s106 to contribute towards local employment scheme.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing. Site not previously in employment land uses (B1-B8) although it is recognised that the hotel use will have provided some jobs in the service sector, although it is presumed that these could be taken up elsewhere in the city.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Largely positive</p>	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any ecological interest; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; air quality as site located outside the AQMA; water quality as site not within GSPZ; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment of urbanised PDL site; access and health due to proximity to services; community safety as the site does not suffer from high levels of crime deprivation; and employment as would not result in loss of employment land and it is assumed that service sector jobs could be taken up elsewhere.</p> <p>Potential adverse effects: The site is subject to high levels of road noise, which could impact upon the amenity of future residents. The site has a risk of surface water flooding and could be at risk of groundwater emergence, however it is noted that approved scheme includes some SUDS (to be secured by condition) which should help reduce flood risk.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 22 dwellings are to be provided, including 9 affordable and 1 wheelchair accessible unit, also having positive equalities impacts. Delivery of 22 dwellings would provide a site density of 100dph which would help to make the best use of land. The demolition of newer parts of the hotel and replacement with high quality extensions would help to improve the appearance of the conservation area street scene. The conversion of part of the site helps to minimise waste through adaptive re-use, and also helps to make the best use of land. The site has a risk of surface water flooding, however it is noted that approved scheme includes some SUDS (to be secured by condition) which should help reduce flood risk and support climate change adaptation. Incorporation of energy efficiency measures within the converted building helps mitigate against climate change. Development on the site may also provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: George Cooper House, 20-22 Oxford Street, Brighton**

<b>Site Description</b>	A 3 storey modern brick building within a mixed use area.
<b>Site Area</b>	0.02ha
<b>Current Use</b>	Former housing office (B1a) (vacant)
<b>Potential Use</b>	13 dwellings. Potential for retail at ground floor.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain any nature conservation designations. Redevelopment of the site may provide opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Not within any designated heritage assets or ANA. Immediately adjacent to Conservation Area, therefore is within the setting. Building unlikely to make a positive contribution to the conservation area setting in its current form. Redevelopment, including through conversion of the existing building, would provide the opportunity to improve the appearance of the façade of the building and contribute to the conservation area more so than it currently does.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops, health and some other facilities all within close proximity of site and within walking distance. Nature of site unlikely to incorporate any parking provision and unlikely to generate any additional vehicle movements when compared with its former use.
6. To reduce air and noise pollution.	--	Site within AQMA and located adjacent to the roadside. Site subject to high levels of road noise. However site unlikely to generate an increase in vehicle trips that would significantly effect air quality in this location (>100 additional light vehicle movements a day within the AQMA).
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.

8. To reduce the risk from all sources of flooding to and from development	--	PDL site. SFRA suggests all of site has surface water flood risk. Site could have risk of GW flooding as GW levels between 0.5m and 5m below ground level.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within the New England Quarter Heat Network Cluster Area and could connect to a network.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and development will not result in loss of green infrastructure or an increase in hard-surfacing, however does not offer any opportunities to increase green infrastructure or flood prevention measures as the building occupies the entire site.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	++	Site currently vacant. Redevelopment would facilitate the adaptive re-use of the building and therefore preserve resources and reduce production of waste.
13. To make the best use of land available.	++	Redevelopment would regenerate derelict/vacant PDL site and make good use of brownfield sites in the city. Delivery of 13 flats would achieve a density of 650dph which exceeds minimum density targets for Development Area locations.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Delivery of 13 dwellings would make a positive contribution to local housing need. Noted that council committee supports the site to provide temporary accommodation for people whom the council has a duty to accommodate, and therefore will support people who are particularly vulnerable.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has very good access to most services. Services within desirable walking distance include shops/town centre (0m), open space (50m), primary schools (240m), health facilities (30m). Secondary schools (2100m) located within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has very good access to most services. Services within desirable walking distance include shops/town centre (0m), open space (50m), primary schools (240m), health facilities (30m). Secondary schools (2100m) located within acceptable walking distance. Site would not result in loss of open spaces, however is within AQMA and subject to high road noise levels which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	--	Site is within 10% most deprived SOA (crime domain). Opportunities to design out crime and facilitate community interaction should be maximised.
18. To increase equality and social inclusion	++	The site will not deliver affordable housing but will provide 13 dwellings to provide temporary accommodation for people whom the council has a duty to accommodate, and therefore will support people who are particularly vulnerable including those who may have protected characteristics. Site also within area of high employment and education deprivation, and could provide training/employment opportunities.
19. To contribute towards the growth of a sustainable and diverse	-	Site is currently vacant. Site was previously in B1 office uses and therefore redevelopment for housing will result in net loss of employment land.



economy increase employment opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any ecological interest; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment of an existing urbanised PDL site; access and health due to proximity to services.</p> <p>Potential adverse effects: The site is subject to high levels of road noise, which could impact upon the amenity of future residents. The site is within the AQMA, although it is unlikely to generate an increase in light vehicle movements that would impact upon air quality in this location. Site has a risk of surface water flooding and could be at risk of groundwater flooding. The site is located within the 10% most deprived SOA crime domain future occupants could therefore be at risk of crime. Redevelopment of the site for housing would result in loss of B1a office floorspace.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing and would provide 13 units for people needing temporary accommodation, also having equalities benefits as these are likely to be vulnerable individuals possibly with protected characteristics. Delivery of 13 dwellings would provide a site density of 650dph which exceeds minimum requirements for Development Area locations. The conversion of a vacant building would facilitate adaptive re-use of existing buildings, would help to preserve resources and minimise production of waste, also helping to make a good use of existing sites. Conversion of a vacant building with no architectural merit, adjacent to a conservation area, may also provide the opportunity to enhance the setting of the conservation area. The site is located within a heat network opportunity area and could therefore provide opportunities to connect to a network, saving energy. Development of the site may also provide employment/training opportunities for adjacent deprived communities.</p>

**SA site assessment: Old Ship Hotel, 31-38 Kings Road, Brighton**

<b>Site Description</b>	Site comprising the north-east corner of the Old Ship Hotel, a part two-part three storey building fronting Black Lion Street, forming a car-park and redundant staff accommodation.
<b>Site Area</b>	0.04ha
<b>Current Use</b>	Garage and valet parking for the hotel; redundant staff accommodation block.
<b>Potential Use</b>	Approved planning application BH2014/02100 to provide 18 dwellings in a 6 storey building

**Nb: assessment based on approved consent**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	0	PDL site; does not contain nor is adjacent to any nature conservation designations and does not contain any BAP habitats. Approved scheme does not include any features that could enhance nature conservation.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	The site is within the Old Town Conservation Area and is adjacent to a Grade II* listed building. Site is also within Brighton Historic Core ANA and is on the Local List. Redevelopment would result in partial loss of asset on Local List. Heritage comments support application, the size of development is considered appropriate to the location and has potential to enhance the street level environment in this location. Heritage confirmed there would be no harmful impact on the listed building adjacent. Archaeological potential outlined in Desk Based Assessment submitted with application and archaeological comments suggested that archaeological mitigation would be required.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus and rail services. Shops and health facilities within close walking distance.
6. To reduce air and noise pollution.	--	Site located entirely within the AQMA. Site located within an existing streetscape that may prohibit pollution dispersal. Any traffic travelling to the site would need travel through the AQMA.

		<p>Development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality in this location.</p> <p>Site subject to road noise levels exceeding 55dcbLs.</p> <p>Although the proposed use of the site is predominantly residential, which in itself is unlikely to generate significant noise, it is noted that the site is in close proximity to various uses that may generate night-time noise. This would need careful consideration to protect the amenity of future occupiers on site, but also to protect the existing adjacent uses and enable them to operate.</p>
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
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. None of site has any risk of surface water flooding. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within or proximity to a potential heat network cluster. Approved scheme includes solar PV.
10. To increase the city's resilience and ability to adapt to climate change.	0	PDL site with no flood risk. Approved scheme does not include any measures that would support climate change adaptation.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former/current uses.
12. To minimise and sustainably manage waste	--	Part of site currently vacant. Approved scheme would involve production of demolition waste and would not provide the opportunity to re-use existing resources.
13. To make the best use of land available.	++	Development of site provides opportunity to redevelop a partly vacant site (staff accommodation block) and make better use of the site. Approved scheme would provide a site density of 450dph which exceeds CPP1 density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Development would provide 18 dwellings, including 7 affordable units and 1 wheelchair accessible unit.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Most services within desirable walking distance including primary school (300m), shops (<50m), health (220m); recreation (600m) within acceptable walking distance. Secondary schools within preferred maximum distance.
16. To improve health and well-	+	Good access to majority of services. Most services within desirable walking distance including primary school

being, and reduce inequalities in health.		(580m), shops (<50m), health (230m); recreation (650m). Secondary schools towards preferred maximum distance. The site could suffer from air and noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	--	Site can be safely accessed. Site is within 10% most deprived SOA (crime domain). Opportunities to design out crime should be maximised.
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 1 wheelchair accessible unit supporting the housing needs of people with protected characteristics. Site is not located within an area of high employment or education deprivation but could provide employment/training opportunities for nearby areas of employment/education deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site not currently in employment use and will not result in loss of employment land or jobs.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; transport due to proximity to fairly regular sustainable transport and some services; water quality as not within a GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; soil quality as site not considered to have potential for contamination; climate change adaptation as site entirely PDL; access to services and health due to proximity to services; economy as development would not result in loss of employment land.</p> <p>Potential adverse effects: Although the development was found not be harmful on adjacent listed building and could improve the street scene thus contributing to the Conservation Area, the site is within an ANA and construction would require mitigation with regards to archaeology. The site is within the AQMA although is unlikely to generate a significant increase in traffic that would impact upon the AQMA. The site is subject to high levels of road noise, and is also adjacent to uses that generate night-time noises, which may not be compatible with residential uses. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p>

		<p>Potential positive impacts that could be maximised include:</p> <p>Development of the site would have positive impacts for housing. If 18 dwellings are provided this should include some affordable units and would equate to a site density of 450dph, would bring an under-used site into more productive use and help to make better use of land resources. The approved scheme includes solar PV which helps to mitigate against climate change. The site may help to provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: Former Saunders Glassworks, Sussex Place, Brighton**

<b>Site Description</b>	A PDL site, formerly occupied by the Saunders Glassworks. Buildings have been demolished and the site cleared.
<b>Site Area</b>	0.14ha
<b>Current Use</b>	Cleared site. Former glassworks sites –buildings demolished.
<b>Potential Use</b>	49 dwellings. Approved consent (on appeal) BH2005/00343: demolition of existing and erection of 5 story block of flats, 2 bungalows and 1 house to deliver 49 units. Buildings demolished and site cleared however no other works commenced on site.

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	0	PDL site. Development of site would result in neither losses nor gains for biodiversity and would have no impact upon designated sites. The approved application does not include any measures to enhance nature conservation which could be incorporated into the scheme to provide a more positive result.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings,	++	Site adjacent to Valley Gardens Conservation Area and some listed buildings situated on Grand Parade. Approved development would not be visible from the Conservation Area as does not exceed the ridge line of the existing buildings.

townscapes, buildings and archaeological sites.		Appeal decision suggests that the development will preserve the settings of these assets and be in accordance with the Listed Buildings and Conservation Areas Act 1990.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops, health and some other facilities all within close proximity of site and within walking distance. Noted that the approved scheme is car free and should therefore not generate an increase in vehicle movements in the location.
6. To reduce air and noise pollution.	--/+	Site within AQMA. Approved scheme is car free and therefore unlikely that the development will generate an increase in light vehicle movements that could significantly affect air quality in this location. Site does not suffer from road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	PDL site. Entire site has low risk of surface water flooding. GW levels between 0.5m and 5m below surface which could increase risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Edward Street Heat Network Opportunity Area. Approved scheme requires development to achieve CSH level 4.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form and will not result in loss of green infrastructure, however approved scheme does not include any measures such as green infrastructure of flood prevention that could support climate change adaptation.
11. To improve soil quality	+	Site could have potential for contamination based on former industrial uses, and therefore offers potential for remediation.
12. To minimise and sustainably manage waste	--	Approved scheme will involve demolition and rebuild and therefore does not present the opportunity to facilitate adaptive re-use or preserve resources.
13. To make the best use of land available.	++	Development of the site offers potential to regenerate derelict PDL site. Delivery of 49 dwellings would provide a site density of 350dph which exceeds minimum density targets set in CPP1.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Approved scheme should deliver 49 dwellings, 20 of which will be affordable and 3 of which will be wheelchair accessible. This will make a significant contribution towards housing need.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has very good access to most services. Services within desirable walking distance include shops (0m), open space (380m), primary schools (400m), health facilities (100m). Secondary schools (2680m) located at preferred maximum.

16. To improve health and well-being, and reduce inequalities in health.	+	Site has very good access to most services. Services within desirable walking distance include shops (0m), open space (380m), primary schools (400m), health facilities (100m). Secondary schools (2680m) located at preferred maximum. Site would not result in loss of open spaces, however is within AQMA which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site easily accessible. Site situated within 30% most deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 3 wheelchair accessible units supporting the housing needs of people with protected characteristics. Site located within 10% most deprived SOA (employment domain) and 20% most deprived SOA education domain and could provide opportunities to increase training and skills.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing. Although site previously provided employment, the site has been vacant for some time.
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues:</p> <p>Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any ecological interest; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; road noise as does not suffer from high levels; water quality as site not within GSPZ; climate change adaptation as redevelopment of urbanised PDL site; access and health due to proximity to services; and employment as would not result in loss of land in current active uses.</p> <p>Potential adverse effects:</p> <p>The site is within the AQMA, although it is unlikely to generate an increase in light vehicle movements that would impact upon air quality in this location. The site is located within the 10% most deprived SOA crime domain future occupants could therefore be at risk of crime. The entire site has a low risk of surface water flooding. The former building has been demolished and therefore development will produce waste and won't conserve natural resources.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. 49 dwellings are to be provided, including 20</p>

		affordable and 3 wheelchair accessible units, also having positive equalities impacts. Delivery of 49 dwellings would provide a site density of 350dph, and would regenerate a derelict site, both of which would help to make the best use of land. Redevelopment of the site is considered to make a positive contribution to adjacent heritage assets. The site could have potential for contamination, which provides opportunities for remediation and improvement in soil quality. The site is located within a heat network opportunity area and could therefore provide opportunities to connect to a network, saving energy. Development on the site may also provide employment/training opportunities for adjacent deprived communities.
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**SA site assessment: Former Selsfield Drive Housing Office, Selsfield Drive, Brighton**

<b>Site Description</b>	A brownfield site comprising a 1 storey pre-fabricated building, consisting of the former Selsfield Drive Housing Office and a block of garages with area of hard-standing, within the Bates Estate neighbourhood.
<b>Site Area</b>	0.06ha
<b>Current Use</b>	Currently in use as temporary storage. Former BHCC Housing Office (B1) and garages.
<b>Potential Use</b>	30 dwellings

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	A PDL site with no ecological designations. Site could offer potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space due to size of site.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site has contains no designated heritage assets, however is within an ANA.



5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to regular bus and train services. Site has good access to some services and facilities which are within walking distance.
6. To reduce air and noise pollution.	++/-	Site not within AQMA. Site subject to road noise.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL or an urbanised nature. Site has no risk of SW flooding. Groundwater levels between 0.5 and 5m below ground surface therefore site may be at risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site located fairly close to the University of Brighton Heat Network Opportunity Area. Delivery of council housing in flatted form provides a good opportunity to provide communal heating, and therefore minimise energy consumption.
10. To increase the city's resilience and ability to adapt to climate change.	+	PDL site which consists of buildings and an expanse of impermeable hard-surfacing. Development will not result in loss of green infrastructure or an increase in hard-surfacing, therefore redevelopment will not increase the risk of impacts associated with climate change.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Redevelopment of the site to provide housing would involve demolition and therefore does not present the opportunity to facilitate adaptive re-use or preserve resources.
13. To make the best use of land available.	+	Site was previously used as a housing office which closed in 2014 and currently provides storage on a temporary basis. Redevelopment of the site, including the garages would make better use of an under-used site. Delivery of 30 units would provide a site density of 600dph which would exceed minimum density requirements.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could deliver 30 units. All housing will be council housing providing affordable rented accommodation which will contribute significantly towards affordable housing need.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has very good access to most services. Services within desirable walking distance include shops (150m), primary schools (600m), health facilities (200m). Secondary schools (2000m) located within acceptable walking distance. Open space (play space) located at 1,000m which is more than preferred maximum walking distance however it is recognised that the Bates Estates incorporates various areas of amenity greenspace.
16. To improve health and well-being, and reduce inequalities in	+	Site has very good access to most services. Services within desirable walking distance include shops (150m), primary schools (600m), health facilities (200m). Secondary schools (2000m) located within acceptable walking

health.		distance. Open space (play space) located at 1,000m which is more than preferred maximum walking distance however it is recognised that the Bates Estates incorporates various areas of amenity greenspace. Site would not result in loss of open spaces, and is not within the AQMA however is subject to high road noise levels which could impact on occupier amenity.
17. To improve community safety, and reduce crime and fear of crime.	--	Site is within 10% most deprived SOA (crime domain). Opportunities to design out crime and facilitate community interaction should be maximised.
18. To increase equality and social inclusion	++	The site could deliver 30 dwellings, all of which will be affordable rented, and could therefore support people on lower incomes. The site is located within the 10% most deprived SOA, employment and education domain and could provide opportunities to increase skills of locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site is currently used for temporary storage and is not in office use. Site was previously in B1 office uses and therefore redevelopment for housing will result in net loss of employment land.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any ecological interest; open space as site does not include designated open space; SDNP due to location within urban area; designated heritage assets as does not contain any; transport due to proximity to sustainable transport and services; air quality as not within a AQMA; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment of an existing urbanised PDL site; access and health due to proximity to services.</p> <p>Potential adverse effects:</p> <p>The site is within a ANA and could have impacts on archaeology. The site is subject to high levels of road noise, which could impact upon the amenity of future residents. The site is located within the 10% most deprived SOA crime domain future occupants could therefore be at risk of crime. The site is located within a GSPZ and could impact upon water quality. Site may have risk of groundwater flooding. Redevelopment of the site for housing would result in loss of B1a office floorspace. Redevelopment of the site would involve demolition of existing buildings on sites and therefore development will produce waste and won't conserve natural resources.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing and would provide 30 all of which would be affordable rented. Delivery of 30 dwellings would provide a site density of 600dph which exceeds minimum</p>

		requirements and would redevelop an underused site, helping to make good use of sites in the city. Redevelopment could incorporate opportunities for nature conservation enhancement. The site is located near to a heat network opportunity area and delivery of flatted units could provide the opportunity to provide communal heating, saving energy. Development of the site may also provide employment/training opportunities for adjacent deprived communities.
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**SA site assessment: Tyre Co, Coombe Road, Brighton (Big Yellow Storage)**

<b>Site Description</b>	A brownfield site consisting of a large 4 storey warehouse type building, visible from Lewes Road, currently occupied by the Big Yellow Storage company.
<b>Site Area</b>	0.32ha
<b>Current Use</b>	Storage (B8)
<b>Potential Use</b>	Potential to deliver 33 dwellings, with potential for some employment floorspace at ground floor level.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site could offer potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has contains no designated heritage assets and is not adjacent to any. No known archaeological potential.

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to regular bus services. Shops and health facilities all within less than 100m and within walking distance. Site could have potential to be car free.
6. To reduce air and noise pollution.	--	Site is within AQMA and traffic travelling to site would need to travel through AQMA. Delivery of 33 dwellings and employment floorspace on site could result in an increase in amount of light vehicle movements that could affect air quality in this location. However it is recognised that the site has good access to sustainable transport which could influence travel choice. Site suffers from high levels of road noise exceeding 55dcbls.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	--	PDL site. Area surrounding building has a medium risk of surface water flooding. Groundwater levels between 0.05m and 0.5m below surface and could be at risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site located in fairly close proximity to Brighton University Heat Network Opportunity Area although may not be able to connect. Flatted development may provide good opportunity to incorporate communal heating.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	?	Unknown whether site has any potential for contamination.
12. To minimise and sustainably manage waste	+	Site currently in-use. Redevelopment could involve conversion of the building and facilitate the adaptive re-use of the building and therefor preserve resources and reduce production of waste.
13. To make the best use of land available.	+	PDL site in current active use. Redevelopment could facilitate adaptive re-use of existing building and make good use of a brownfield site. 33 dwellings would deliver a site density of 103dph which would meet density targets for development area locations.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 3 dwellings could be delivered on site. This should include 40% affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. Services within desirable walking distance including shops (0m), health (c.50m), open space (c50m) and primary schools (360m). Secondary school more than preferred maximum (2,900m). Site also has good access to public transport.
16. To improve health and well-	+	Good access to services. Services within desirable walking distance including shops (c.100m), health (c.50m)

being, and reduce inequalities in health.		and open space (c50m) and primary schools (360m). Secondary school more than preferred maximum (2,900m). Site also has good access to public transport. Development of site would not result in loss of open space. Site is within AQMA and does have high road noise which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site can be safely and easily accessed. Site located within 50% least deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site has potential to deliver affordable housing. Site situated within 50% most deprived SOA education domain and 30% least deprived employment domain, but is adjacent to some deprived communities and could therefore offer opportunities to provide training-based skills.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	--	Site currently in employment uses (b8). Redevelopment of site as a mixed use scheme may provide the opportunity to deliver some B1/B8 workspace, though will result in a significant net loss of employment floorspace.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as the site does not contain nor is in proximity to any heritage assets; transport due to proximity to sustainable transport and services; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to proximity to services; community safety as site not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with air quality, as the site is within the AQMA and can only be accessed via the AQMA. The site is subject to high levels of road noise which could impact upon occupier amenity. The site is within a GSPZ1 and construction could pose a risk to water quality. Parts of the site has a risk of surface water flooding and could be at risk of groundwater flooding. Development will result in net loss of employment land, even some employment floorspace is delivered.</p> <p>Potential positive impacts:</p> <p>Delivery of 33 dwellings would have positive impacts for housing, and would deliver 40% affordable housing. Re-development of the site through conversion, would help to reduce waste and conserve resources, would</p>

		also help to make good use of sites in the city, and would achieve minimum density targets for development area locations. Development of the site may provide opportunities for nature conservation enhancement. Although not within a Heat Network Cluster Area, the site is in fairly close proximity and flattened development may provide the opportunity to use energy more efficiently e.g. through communal heating schemes, supporting climate change mitigation. Redevelopment of the site could result in remediation of contaminated land, although this is fairly uncertain. Development could provide training/employment opportunities for adjacent communities suffering from education/employment deprivation.
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**SA site assessment: Whitehawk Clinic, Whitehawk Road, Brighton**

<b>Site Description</b>	Former clinic within Whitehawk neighbourhood consisting of a group of 1 and 2 storey buildings
<b>Site Area</b>	0.1ha
<b>Current Use</b>	Vacant
<b>Potential Use</b>	Demolition of existing building, with potential to deliver 38 dwellings in a 5 storey building (BH2017/01665)

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Noted that the proposed scheme includes tree planting.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	Development of this site will not result in losses of open space. Site will not result in new public open space, however will result in increase in green infrastructure, including on site community garden and lawn area, and food growing space are proposed in the scheme.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site contains no designated heritage assets and is not adjacent to any. No known archaeological potential.

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good close access to a regular bus service. Most services within close proximity to site and within walking distance.
6. To reduce air and noise pollution.	++	Site situated outside AQMA. Site does not suffer from road noise. Development on site unlikely to result in an increase in light vehicle movements that would significantly affect air quality in this location.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL. No risk of flooding on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site not within a heat network area, however noted that proposed scheme incorporates solar hot water and solar PV, as well as measures regarding fabric efficiency.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site on PDL land. Proposed scheme will result in increase in green infrastructure which will support adaptation.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Site currently vacant. Redevelopment will involve demolition, and therefore will not facilitate adaptive re-use or conserve resources.
13. To make the best use of land available.	++	Vacant PDL site. Redevelopment will therefore make better use of the site. Site will deliver high density housing (350dph).
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site will deliver 38 dwellings with proposed scheme including 15 affordable units. 1 wheelchair accessible unit would be secured by condition.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. Services within desirable walking distance including health (c.290m) and open space (c620m) and primary schools (530m). Shops within acceptable walking distance (450m). Secondary school more than preferred maximum (5,100m).
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to services. Services within desirable walking distance including health (c.290m) and open space (c620m) and primary schools (530m). Shops within acceptable walking distance (450m). Secondary school more than preferred maximum (5,100m). Site also has good access to public transport. Development of site would not result in loss of open space. Site not within AQMA and does not have high road noise.

17. To improve community safety, and reduce crime and fear of crime.	+	Site within 30% most deprived SOA (crime domain) and therefore opportunities to design out crime should be maximised. However proposed scheme incorporates communal garden which can increase passive surveillance and would bring back into use a vacant site.
18. To increase equality and social inclusion	++	Site would deliver 40% affordable housing and 1 wheelchair accessible units. Site within 10% most deprived SOA education and employment domains and could therefore provide opportunities to provide skills/training for locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Although not employment land, it is recognised that the clinic would have provided jobs; however these have been re-provided in a new health centre within the area.
<b>Overall Summary and Policy Considerations</b>	Largely positive.	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations or BAP habitats/species; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; air quality as not within AQMA; road noise; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site predominantly urbanised PDL; access and health due to proximity to services; employment as will not result in loss of land in employment uses.</p> <p>Potential adverse effects: Proposed scheme will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings as will involve demolition and new build.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. Proposed scheme is for 38 dwellings which include 40% affordable units. Delivery of 38 dwellings would provide a site density of 350 dwellings, would also redevelop a derelict/vacant site and would help make the best use of land. Incorporation of green infrastructure, as proposed in the scheme, would provide opportunities for nature conservation enhancement and also support climate change adaptation. Provision of a community garden may provide opportunities for</p>



		community interaction, passive surveillance and could support community safety. Incorporation of LZC technologies helps mitigate against climate change. The site may also provide employment/training opportunities for adjacent deprived communities
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**SA site assessment: Buckley Close Garages, Buckley Close, Hangleton**

<b>Site Description</b>	A brownfield site, comprising 51 BHCC owned garages within a residential area.
<b>Site Area</b>	0.25ha
<b>Current Use</b>	Empty garages, no longer being let due to safety concerns.
<b>Potential Use</b>	Site has potential for 12 units of modular-type housing.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site; does not contain nor is adjacent to any nature conservation designations and does not contain any BAP habitats. Redevelopment of the site may provide opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Although situated towards the north of Hangleton and in fairly close proximity to the SDNP, the site is within an existing urban context. The existing topography and properties should also screen the development from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site within Hangleton Way ANA and therefore has known archaeological potential. Site does not contain any other heritage assets.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve	+	Located in good proximity to SRN and an in area where the car is a fairly dominant form of transport (car ownership higher than Brighton average). However, very close access to bus stop offering fairly frequent services. Shops, health facilities and schools all less than 650m and within walking distance.

travel choice.		
6. To reduce air and noise pollution.	-/+	Site located outside AQMA and unlikely to generate a significant amount of traffic and not an amount that would contribute towards reducing air quality in this location. Entire site suffers from road noise over 55dcbLs.
7. To improve water quality (ecological, chemical and quantity status)	-	Site within GSPZ 3 where groundwater is at increased risk of pollution.
8. To reduce the risk from all sources of flooding to and from development	++	PDL site within flood zone 1. No risk of surface water or groundwater flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	--	The site is not within a heat network opportunity area. It is unknown whether modular type housing will have any potential to incorporate any low/zero carbon technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Former garage site therefore no potential to make use of any of the buildings on site.
13. To make the best use of land available.	++	Development of the site would provide the opportunity to make better use of a predominantly vacant/derelict site. If 12 units of housing are delivered, this would give a site density of 48dph which almost meets the requirements of CPP1 density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Site has potential to provide 12 dwellings. This would be delivered as part of the New Homes for Neighbourhoods scheme, which provides new council homes for rent, therefore will be affordable.
15. To improve the range, quality and accessibility to services and facilities.	+	The site is within desirable walking distance to primary and secondary schools and playspace. The site is within acceptable distance to health facilities. A local shop is located near the site however a wider range of services are at preferred maximum distance.
16. To improve health and well-being, and reduce inequalities in health.	+	The site is within desirable walking distance to primary and secondary schools and playspace. The site is within acceptable distance to health facilities. A local shop is located near the site however a wider range of services are at preferred maximum distance. Development of site will not result in loss of open spaces which provide recreation and has good air quality, although could suffer from noise issues.
17. To improve community safety,	++	Site is safely and easily accessible by limited amount of different transport modes. Development of site would

and reduce crime and fear of crime.		regenerate a vacant/derelict site and therefore improve community safety. Site situated within 20% least deprived SOA (crime domain).
18. To increase equality and social inclusion	+	Site has potential to deliver 100% affordable housing delivered through the new homes for neighbourhoods scheme. Unknown whether modular-type housing would be targeted towards a specific group of people (e.g. Eastergate Road modular housing site aimed for young people). Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities. Site itself within 40% most deprived SOA (education and employment domain).
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing. Redevelopment of site will not result in any loss of employment land or jobs on site.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; transport due to proximity to fairly regular sustainable transport and some services; air quality as site not within AQMA and is unlikely to generate an amount of vehicle movement that could significantly worsen air quality; flood risk as site not at risk flooding; soil quality as site not considered to have potential for contamination; climate change adaptation as site entirely PDL; access to services and health due to proximity to services; economy as development would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site could raise issues with archaeology as the site is within an ANA. The site is subject to high levels of road noise from the A27 which could impact upon occupier amenity. The site is within a GSPZ and construction could pose a risk to water quality. The site is not within a heat network opportunity area and it is unknown whether modular housing will provide the opportunity to include low/zero carbon technologies, impacting upon climate change mitigation. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing, particularly as all units would be affordable delivered through new homes for neighbourhoods scheme. If 12 dwellings are provided this would equate to a site density of 48dph, and would bring vacant site into use, being a good use of under-used land. Development</p>

		of this PDL site could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The site could provide employment/training opportunities for adjacent deprived communities.
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#### SA site assessment: Former playground, Swanborough Drive, Brighton

<b>Site Description</b>	A former playground, currently of a cleared nature. Situated on the edge of the Whitehawk neighbourhood in close proximity to some high density housing.
<b>Site Area</b>	0.023ha
<b>Current Use</b>	Derelict / cleared ground
<b>Potential Use</b>	Site has potential for 39 residential dwellings.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site; does not contain any ecological designations and does not contain any BAP habitats. Site is adjacent to LNR. Site comprise a cleared site, with some managed grassed areas and is unlikely to have any ecological value. Redevelopment of the site may provide additional opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site was formerly a playground and publically accessible designated open space. Playground facility has been re-provided in close proximity to the site on an site that was formerly designated natural/semi-natural open space. Therefore, although playground has been re-provided, development of the site will result in a net loss of open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is in fairly close proximity to the SDNP, however site is within an existing urban context and site is not visible from the SDNP due to topography. A development of 39 dwellings on the site would be unlikely to break the ridge line, and is therefore unlikely to have an impact on the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to or within the setting of any designated heritage assets and has no known archaeological potential.

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	Site has very good access to a bus service (0m) offering regular services (every 6 minutes) and has a local shop nearby and opportunities for recreation. Some services including health and secondary schools located more than 900m from the site which may influence travel choice.
6. To reduce air and noise pollution.	++	Site located outside the AQMA and does not suffer from high levels of road noise. Delivery of 39 dwellings unlikely to result in an increase in daily light vehicle movements that would impact upon air quality in this location.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is of a cleared nature, although may have previously comprised some grassed areas which could have helped with water absorption. However, site is within flood zone 1 and has not risk of surface water flooding on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is currently of a cleared nature. Redevelopment of the site will therefore not result in loss of green infrastructure and could offer opportunities to increase green infrastructure.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	0	Cleared site with no buildings, therefore provide no opportunity to make use of any buildings/resources on site.
13. To make the best use of land available.	++	Site currently cleared and vacant. Development would therefore redevelop a vacant/cleared site and make better use of the site. Delivery of 39 dwellings would provide a site density of 195dph which exceeds CPP1 density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to provide 39 dwellings. This would be delivered as part of the New Homes for Neighbourhoods scheme, which provides new council homes for rent, therefore will be affordable.
15. To improve the range, quality and accessibility to services and facilities.	+	Primary school considered to be within desirable walking distance (900m), as is a local shop (200m) and local park (200m), however other services at or above preferred maximum including health (950m) and secondary school (5,200m).
16. To improve health and well-being, and reduce inequalities in	+	Primary school considered to be within desirable walking distance (900m), as is a local shop (200m) and local park 9200m), however other services at or above preferred maximum including health (950m) and secondary

health.		school (5,200m). Site currently has good air quality and does not suffer from road noise.
17. To improve community safety, and reduce crime and fear of crime.	--	Site is within 10% most deprived SOA (crime domain). Opportunities to design out crime and facilitate community interaction should be maximised.
18. To increase equality and social inclusion	++	Site has potential to delivery 100% affordable housing. Site located within 20% most deprived SOA employment domain and 10% most deprived SOA education domain and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site (in accordance within its planning consent) is unlikely to raise any issues SDNP due to the sites location within a coombe and the likely height of development; heritage as the site does not contain any designated heritage assets or have potential for archaeology; air and noise quality as site situated outside the AQMA, is unlikely to generate a significant amount of traffic and is not subject to high levels of road noise; water quality as site outside the GSPZ; flood risk as there is no risk of flooding on site; soil quality as site unlikely to be contaminated; climate change adaptation as site contains limited green infrastructure and could provide opportunities to increase GI; access to services and health as some services within close proximity to the site; economy as development would not result in any loss of employment land. Development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Development of the site could raise issues with biodiversity, as the site is adjacent to an LNR and could increase recreational pressure on the adjacent site. The site is designated open space and although the playground has been re-provided, there will still be a net loss of open space in the area when redeveloped. Although the site has good access to regular public transport, some services are located some distance from the site which could influence travel choice. Site is not within a heat network opportunity area and may not incorporate features to mitigate climate change. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing, particularly affordable housing as all housing would be delivered under the New Homes for Neighbourhoods scheme which deliver affordable rented</p>

		housing. Delivery of 39 dwellings would achieve a dwelling density of 195dph which would make good use of the site. Development could provide employment/training for locally deprived communities.
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**SA site assessment: Former Hollingbury Library, Carden Hill, Hollingbury**

<b>Site Description</b>	The site comprises a 2-storey building former occupied by Hollingbury library and some surrounding open space, designated as amenity greenspace, and area of hardstanding, located within the Hollingbury neighbourhood.
<b>Site Area</b>	0.063ha
<b>Current Use</b>	Former library – now vacant. Site also includes some amenity greenspace.
<b>Potential Use</b>	Site has potential to deliver 10 dwellings as part of the New Homes for Neighbourhoods scheme.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site; does not contain nor is adjacent to any nature conservation designations and does not contain any BAP habitats. Site contains an area of amenity grassland and a tree, however redevelopment of the site may provide additional opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Development of site could result in loss of amenity greenspace currently located on site.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to, or within the setting of any designated heritage assets and has no potential for archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Located in good proximity to SRN and an in area where the car is a fairly dominant form of transport. However, good access to bus stop offering fairly frequent services. Shops, health facilities and primary schools all less than 350m and within walking distance.

6. To reduce air and noise pollution.	++	Site situated outside the AQMA and away from roads which generate high levels of road noise. Site use unlikely to generate significant amounts of traffic.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	PDL site located in flood zone 1. No risk of surface water flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	The site is not within a heat network opportunity area. Unknown whether site will incorporate LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is predominantly developed with an area of hard-standing and does include a small grassed areas and flower-beds which could be lost to redevelopment depending on the footprint of scheme on site. However the site does not have any risk of surface water flooding and redevelopment is unlikely to significantly impact upon climate change adaptation.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Redevelopment of site unlikely to make use of existing building or resources on site and will produce waste.
13. To make the best use of land available.	++	Development of the site would provide the opportunity to make better use of a vacant site. If 10 units of housing are delivered, this would give a site density of 158dph which exceeds CPP1 density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Site has potential to provide 10 dwellings. This would be delivered as part of the New Homes for Neighbourhoods scheme, which provides new council homes for rent, therefore will be affordable.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has very good access to most services. Services within desirable walking distance include primary schools (260m), health facilities (120m) and secondary schools (1420m). Local shops and nearest park located within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	Site has very good access to most services. Services within desirable walking distance include primary schools (260m), health facilities (120m) and secondary schools (1420m). Local shops and nearest park located within acceptable walking distance. Development of site may result in loss of amenity greenspace, however this is small in nature and would not impact on people's ability to access recreation facilities. Site has both good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible by different transport modes. Site located in 50% most deprived SOA (crime domain).



18. To increase equality and social inclusion	++	The site could deliver 10 dwellings, all of which will be affordable rented, and could therefore support people on lower incomes. The site is located within the 20% most deprived SOA employment and 30% most deprived SOA education domain and could therefore provide opportunities to increase skills of locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Development of site will not result in loss of employment land. Library services have been re-provided elsewhere in the neighbourhood.
<b>Overall Summary and Policy Considerations</b>	Mainly positive / no issues	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any ecological designations; SDNP due to location; heritage as does not contain nor is in proximity to designated heritage assets or archaeology; transport due to proximity to sustainable transport and services; air quality as not within an AQMA and is unlikely to generate an amount of vehicle movement that could significantly worsen air quality; road noise as does not suffer from road noise; water quality as not within a GSPZ; flood risk as there is no risk of flooding on site; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment would not result in significant loss of open space; access and health due to proximity to services; crime as not located within an area of high crime deprivation; employment as would not result in loss of land in employment uses.</p> <p>Potential adverse effects: Development of the site could result in loss of a small area of amenity green space. Site is not within a heat network opportunity area and unknown whether it could incorporate low/zero carbon technologies and therefore mitigate climate change. Redevelopment of the site would involve demolition of existing buildings on site and therefore development will produce waste and won't conserve natural resources.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing and would provide 10 all of which would be affordable rented. Delivery of 10 dwellings would provide a site density of 158dph which exceeds minimum requirements and would redevelop an vacant site, helping to make good use of sites in the city. Redevelopment could incorporate opportunities for nature conservation enhancement.. Development of the site may also provide employment/training opportunities for locally deprived communities.</p>

**SA site assessment: 29-31 New Church Road, Hove**

<b>Site Description</b>	A brownfield site consisting of two detached villas within grounds with designated open space (sports grounds/school pitch), set back from New Church Road. The site includes the Brighton & Hove Hebrew Congregation Synagogue.
<b>Site Area</b>	0.41
<b>Current Use</b>	In use as nursery and Place of Worship (Synagogue/Torah Montessori Nursery/Brighton & Hove Hebrew Congregation/Mark Luck Hall)
<b>Potential Use</b>	SHLAA analysis indicates potential for 40 dwellings on part of site, with synagogue retained at rear of site.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site does not contain any designated sites, however part of site (19 New Church Road) has TPO across the site.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	The site includes privately owned designated open space of the school grounds/sports pitch typology which is presumably used by the nursery. Development of this site could result in loss of privately owned open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site immediately adjacent to Pembroke & Princes Crescent Conservation Area and St Christopher's School which is locally listed. Site has non know archaeological potential.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to regular public transport. Most services and facilities located in fairly close proximity to the site and within walking distance.
6. To reduce air and noise pollution.	++	Site not within AQMA and unlikely to generate an increase in light vehicle numbers that would significantly affect air quality in this location. Site does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity	++	Site not within zones 1, 2 or 3 of a GSPZ.

status)		
8. To reduce the risk from all sources of flooding to and from development	++	Site is a combination of PDL and open space. Development may reduce the amount of open space on the site area. However, site has no risk of flooding. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a Heat Network Opportunity Area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Part of the site includes trees and open spaces. Development of the site could result in loss of green infrastructure.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Redevelopment of the site to deliver 40 dwellings would involve the demolition of buildings on the site, and would not provide potential to facilitate adaptive re-use and conserve resources.
13. To make the best use of land available.	+	Although the site is currently in use, delivery of 40 dwellings would help to make good use of the site and contribute towards housing need. Deliver of 40 dwellings on site would provide a site density of 100dph which exceeds minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates that 40 dwellings could be delivered on site. This would include 40% affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. Services within desirable walking distance including shops (290m), health (c.50m), open space (c700m) and primary schools (550m). Secondary school (1670m) and health (430m)within acceptable walking distance (430m).Site also has good access to public transport.
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to services. Services within desirable walking distance including shops (290m), health (c.50m), open space (c700m) and primary schools (550m). Secondary school (1670m) and health (430m)within acceptable walking distance (430m).Site also has good access to public transport. Development of site would not result in loss of publically accessible open space, and site does not suffer from poor air or noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is within 40% least deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site should deliver 40% affordable units. Site is within 40% least deprived SOA (employment domain) and 10% least deprived SOA (education domain)however could provide training/employment opportunities for nearby deprived communities.
19. To contribute towards the growth of a sustainable and diverse	0	Site identified for housing only. No employment land will be lost, although it is recognised that the current nursery use would provide some jobs.

economy increase employment opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:  Development of the site is unlikely to raise any issues with SDNP due to location within urban area; transport due to proximity to fairly regular sustainable transport and various services; air quality as situated outside the AQMA and is unlikely to generate an amount of vehicle movement that could significantly worsen air quality; noise as does not suffer from road noise; water quality as not within a GSPZ; flood risk as no risk of flooding on site; soil quality as site unlikely to contain contaminated land; access to services and health due to proximity to services; community safety as not within an area with high crime deprivation; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects:  Development of the site could result in adverse effects on biodiversity, as a large proportion of the site is covered with a TPO; open space as the grounds of the site are designated open space and could result in loss of; heritage as site adjacent to designated and non-designated heritage assets; climate change mitigation as site not within a heat network opportunity area; climate change adaptation as development could result in loss of green infrastructure; waste, as redevelopment would not provide opportunity to convert existing building and conserve resources.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. If 40 dwellings are to be provided, this would include 16 affordable units. Delivery of 40 dwellings would provide a site density of 100dph which would help to make the best use of land and exceeds minimum density targets. The site may also provide employment/training opportunities for adjacent deprived communities.</p>

**SA site assessment: 189 Kingsway, Hove**

<b>Site Description</b>	A brownfield site, mainly comprising bare ground and rubble, occupying the land of the former Sackville Hotel, on a prominent position on Kingsway.
<b>Site Area</b>	0.14ha
<b>Current Use</b>	Former hotel demolished. Cleared site.
<b>Potential Use</b>	Site has potential to deliver 60 dwellings (approved application BH2017/01108)

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	No nature conservation designations on site. Development of site would result in neither losses nor gains for biodiversity, as proposed scheme does not include any measures which could enhance nature conservation. Site considered to be of low ecological value. Ecological appraisal found potential for nesting birds and a fox den was present on site. Mitigation measures suggested incorporating wildlife friendly landscaping which is included within the scheme, although it is unclear whether the proposal incorporates other features to support nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site within Sackville Gardens Conservation Area. Site currently comprises bare ground. Heritage consultation comments indicate that the approved scheme would have an adverse impact on the Conservation Area, due to its scale and roofline, however that the harm would be less than substantial.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Site has good access to regular bus services. Site has reasonable access to most services. Approved scheme includes 33 car free units.
6. To reduce air and noise pollution.	-	Site immediately adjacent to AQMA and even with 52% car-free units, site could still result in an increase in

		light vehicle movements that could affect air quality in this location. Site suffers from high levels of road noise which would need to be addressed through design.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site has high risk of surface water flooding on part of site and scheme includes basement level parking. Groundwater levels at least 5m below surface therefore low risk of GW emergence.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within a heat network opportunity area. Approved scheme include array of photovoltaic on the roof, and various measures to support energy efficiency including fabric efficiency.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and will not result in loss of green infrastructure although will result in an increased area of hard-standing compared to former hotel use.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses. Land contamination report confirms this.
12. To minimise and sustainably manage waste	0	Site is cleared site therefore offers no potential to re-use any existing buildings.
13. To make the best use of land available.	++	Site consists of bare ground/vacant site. Redevelopment provides opportunity to make better use of a vacant site and will result in a site dwelling density of 428dph.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site will deliver 60 dwellings. Scheme approved on the basis that between 8 and 12 affordable units would be provided (<40%).
15. To improve the range, quality and accessibility to services and facilities.	+	Reasonable access to services. Some services located within desirable walking distance including primary school (900m). Secondary schools (2100m) within acceptable walking distance. Open space (park) 850m), health (1,100m) and shops (500m) all at preferred maximum walking distance. Site does have good access to public transport.
16. To improve health and well-being, and reduce inequalities in health.	+	Reasonable access to services. Some services located within desirable walking distance including primary school (900m). Secondary schools (2100m) within acceptable walking distance. Open space (park) 850m), health (1,100m) and shops (500m) all at preferred maximum walking distance. Site does have good access to public transport. Development would not result in loss of open space. Site may have air and noise quality issues.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime) domain. Development will result in development of a derelict site which could support community safety improvements.
18. To increase equality and social	+	Site will provide some affordable housing, although less than the CPP1 target. Some wheelchair accessible units

inclusion		will be provided. Site within 30% most deprived SOA employment domain and 30% least deprived SOA education domain, and could therefore provide employment opportunities for locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site for residential uses only. Development of site will not result in loss of employment land.
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues:  Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations or BAP habitats/species and may provide opportunities to provides net gains; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality as site not shown to be contaminated; climate change adaptation as site is entirely on urbanised PDL; waste, as there are no existing buildings on site; access and health due to proximity to services; community safety as site not within an area of high crime deprivation; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects:  Development of the site could raise issues with air quality as within AQMA and could generate an increase in light vehicle movements that could affect air quality; noise, as site suffers from high levels of road noise; heritage due to potential for impact upon conservation area; flood risk, as part of site has high risk of surface water flooding and scheme proposes basement parking.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. 60 dwellings are to be provided, including a proportion of affordable units, also having positive equalities impacts. Delivery of 60 dwellings would provide a site density of 428dph which would help to make the best use of land, as well as bring a vacant/derelict site back into use. Incorporation of LZC technologies helps mitigate against climate change. The site may also provide employment/training opportunities for adjacent deprived communities.</p>

**SA site assessment: Kings House, Grand Avenue, Hove**

<b>Site Description</b>	A brownfield site comprised of 5 storey Grade II listed building in a prominent seafront location.
<b>Site Area</b>	0.52ha
<b>Current Use</b>	Vacant. Former council offices (B1)
<b>Potential Use</b>	Potential to deliver 140 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	A PDL site with no ecological designations and no BAP habitats. Site could offer potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site itself is a Grade II listed building. Site situated within The Avenues Conservation Area. Site not within a ANA
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to regular public transport. Site is within walking distance of some services.
6. To reduce air and noise pollution.	--	Site partially within AQMA. Site suffers from high levels of road noise. Delivery of 140 dwellings could result in an increase in light vehicle movements that could impact upon air quality within the AQMA.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all	--	Flooding incident recorded on site in 2014 (surface water). Some small areas of low, medium and higher



sources of flooding to and from development		surface water flood risk around site area. Groundwater levels between 0.025m and 0.5m below ground levels and site could be at risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	++	Site currently vacant. Redevelopment would facilitate the adaptive re-use of the building and therefore preserve resources and reduce production of waste.
13. To make the best use of land available.	++	Delivery of 140 dwellings would provide a site density of 269dph. Development of site will bring back into use a vacant building.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 140 dwellings. This would include affordable housing (40% = 56 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to some services with primary schools (1,000m) and shops (300m) located within desirable walking distance. Secondary schools (1,600m) located within acceptable walking distance. Health services (950m) located at preferred maximum.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to some services with primary schools (1,000m) and shops (300m) located within desirable walking distance. Secondary schools (1,600m) located within acceptable walking distance. Health services (950m) located at preferred maximum. Development of site would not result in loss of open space. Site is within AQMA and suffers from high levels of road noise which could impact upon occupier amenity.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 40% least deprived SOA (crime domain). Site safely and easily accessible by public transport.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site situated within 40% least deprived SOA for both education and employment and may not be able to provide opportunities for locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	--	Site currently vacant although last former use was as B1 office space. Development of site would therefore result in significant loss of land in employment uses.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</p>	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality as site unlikely to be contaminated; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects: Site itself comprises a Grade II listed building and is within a Conservation Area. Site is within the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is also subject to high levels of road noise. Air quality and noise could impact upon occupier amenity. Site is at risk of surface water flooding and potentially groundwater flooding. Site is not within a heat network opportunity area. Redevelopment of the site for housing would result in loss of significant amount of land formerly in employment uses.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 140 dwellings are provided this should include 40% affordable units, would equate to a site density of 269dph and would therefore make good use of a vacant building. Redevelopment of building would facilitate adaptive re-use and preserve resources. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation.</p>
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**SA site assessment: Land at and surrounding Downsman Pub, Hangleton Way, Hove**

<b>Site Description</b>	A PDL site within a residential area consisting of a vacant pub and surrounding pub garden and open space.
<b>Site Area</b>	0.4ha
<b>Current Use</b>	Vacant. Former public house and surrounding open space (designated countryside).
<b>Potential Use</b>	Approved planning application Bh2017/00662 demolition of pub and delivery of 33 dwellings (10 single houses and 23 flats in a 4 storey block) and D1 space.

**Assessment based on assumption that approved scheme will be implemented and takes into consideration any mitigation. This may be shown as a mixed -/+ score)**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-/+	Not near or adjacent to any designated nature conservation sites. Predominantly a PDL site although does contain some open space which could have potential for some nature conservation interest. Ecological surveys detected presence of populations of slow worms and common lizard. The planning consent is awarded based on translocation of these populations as well as protection of nesting birds that could be on site. Approved scheme includes some areas that would enhance biodiversity including trees and wildflower meadows. Translocation provides mitigation and biodiversity enhancements should provide net gains.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	The open space on site is not protected by CPP1 CP16 as is designated as “countryside”. Development of the site would therefore not result in loss of designated open space. The approved scheme includes provision of some communal open space (amenity green space?) for the flats and would therefore contribute to increasing provision of open space. The site also meets accessibility standards for at least 1 type of open space (children’s playspace 200m). Unknown whether planning consent will include a S106 contribution towards open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Although situated towards the north of Hangleton and in fairly close proximity to the SDNP, the site is within an existing urban context. The existing topography and properties should also screen the development from the SDNP.
4. To protect and conserve the city’s historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-/+	Site is within ANA and therefore has known archaeological potential. Planning consent requires further archaeological investigation is undertaken by condition to enable archaeological deposits to be preserved in situ or recorded which should provide mitigation. Site unlikely to have any impacts on other designated heritage assets.
5. To reduce the need to travel by car, encourage travel by sustainable	+	Located in good proximity to SRN and an in area where the car is a fairly dominant form of transport (car ownership higher than Brighton average). Planning consent includes provision of parking spaces at a lower rate

forms of transport and improve travel choice.		than permitted in this location. However, very close access to bus stop offering fairly frequent services. Some essential services nearby and shops, health facilities and schools all less than 600m and within walking distance.
6. To reduce air and noise pollution.	-/+	Site located outside AQMA. Small part of site suffers from road noise over 55dcb. Site may generate traffic at certain times of the day although unlikely to be a significant amount and not an amount that would contribute towards reducing air/noise quality.
7. To improve water quality (ecological, chemical and quantity status)	-/+	Site within GSPZ 3 where groundwater is at increased risk of pollution. Noted that planning consent includes SUDS which should help manage surface water that can cause pollution.
8. To reduce the risk from all sources of flooding to and from development	-	Site includes small area at low risk of flooding. Site is a combination of forms including existing urbanised area and area of open space. Development will reduce the amount of open space on the site area. Planning consent includes provision of SUDs to help manage surface water, and permeable paving of hard-landscaped areas, which should help to reduce risk of any increased flood risk arising from the development and provides mitigation.
9. To reduce emissions of greenhouse gases that cause climate change	+	No opportunity to connect to a heat network as outside cluster area. Approved planning consent includes use of some renewable technologies including photovoltaics.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is a combination of forms including existing urbanised area and area of open space. Planning consent includes provision of SUDs to help manage surface water, and permeable paving of hard-landscaped areas, which should help to reduce risk of any increased flood risk arising from the development. Planning consent includes soft landscaping, trees and areas of planting, therefore also include provision of green infrastructure.
11. To improve soil quality	+	Site has been identified (through site investigations) as having contamination which would require remediation and would result in an improvement to soil quality.
12. To minimise and sustainably manage waste	--	Planning consent involves demolition of existing building, therefore redevelopment of this site will not provide the opportunity to re-use resources on site.
13. To make the best use of land available.	++	Pub has been vacant since 2014. Redevelopment of the site, in accordance with the consent would regenerate derelict land and would deliver a site density of 82dph which exceeds CPP1 minimum density targets for this location.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Approved scheme should deliver 33 dwellings including 13 affordable units of a mix of types including single dwellings and flats.
15. To improve the range, quality and accessibility to services and	+	The development includes unit for D1 community use which would help increase access to this use. It is noted that redevelopment also includes the loss of D uses (public house) although it is acknowledged this had been

facilities.		vacant for some time. The site is within desirable walking distance to primary and secondary schools and playspace. The site is within acceptable distance to health facilities. A local shop is located near the site however a wider range of services are at preferred maximum distance.
16. To improve health and well-being, and reduce inequalities in health.	+	The site is within desirable walking distance to primary and secondary schools and playspace. The site is within acceptable distance to health facilities. A local shop is located near the site however a wider range of services are at preferred maximum distance. The site could suffer noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is safely and easily accessible by limited amount of different transport modes. Development provides opportunity of increasing community interaction (provision of communal areas of open space within approved scheme) as well as through community space. Site includes D use which also could help increase passive surveillance at different times of day. Site situated within 20% least deprived SOA (crime domain).
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities. Site itself within 40% most deprived SOA (education and employment domain).
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing. Redevelopment of site will not result in any loss of employment land or jobs on site (as pub been vacant for 4 years).
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance with its planning consent) is unlikely to raise any issues with open space as site does not contain any designated open space; SDNP due to location within an existing urban context and design of development; heritage due to location away from designated heritage assets; transport due to proximity to fairly regular sustainable transport and various services; air quality as situated outside the AQMA and is unlikely to generate an amount of vehicle movement that could significantly worsen air quality; access to services and health due to proximity to services; and employment as would not result in loss of employment land.</p> <p>The following issues were identified and the consented scheme includes measures which should mitigate issues</p>

		<p>including:</p> <p>Impacts upon biodiversity due to presence of protected species – will require translocation; impacts upon occupier amenity due to road noise from A27 – should be addressed through design of build; impacts upon archaeology due to high archaeological potential of the site- will require trial trenching, preservation or recording; water quality due to location within GSPZ; flood risk due to low risk of flooding on the site – will be reduced through provision of SUDS and permeable paving. In addition, development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. 33 dwellings are to be provided, including 12 affordable units. Delivery of 33 dwellings would provide a site density of 82dph which would help to make the best use of land. Provision of a communal garden may provide opportunities for community interaction and supports community safety. Incorporation of SUDS and green infrastructure helps support climate change adaptation. Incorporation of LZC technologies helps mitigate against climate change. The site may also provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: Victoria Road Former Housing Office, Victoria Road, Portslade**

<b>Site Description</b>	A brownfield site consisting of the council owned former housing office and bowling green, designated open space – outdoor sports.
<b>Site Area</b>	0.16ha
<b>Current Use</b>	B1 and open space
<b>Potential Use</b>	Potential for 20 dwellings. Development of site would incorporate re-provision of bowling green in alternative location.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	A PDL site with no nature conservation designations. Site could offer potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-/0	Site currently includes a bowling green which is designated as outdoor sports open space. Development would result in loss of this on-site , however aspirations for re-development of the site include the re-provision of this facility elsewhere. If this was on a like-for-like basis then this would have negligible impacts; although if this was not like-for like then this could result in adverse impacts.

3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site is adjacent to Portslade Town Hall, which is locally listed. No other designated heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to regular bus and train services. Site has good access to most services and facilities which are within walking distance.
6. To reduce air and noise pollution.	+	Site not within AQMA however is c.250m from the Portslade AQMA on Trafalgar Road and 400m from Boundary Road AQMA. Delivery of 20 dwellings is considered unlikely to significantly increase the number of daily light vehicles to an amount that would adversely affect air quality. Site does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	Site is partly PDL and partly open space. Open space of any form performs natural functions relating to water absorption therefore urbanisation of this space could increase surface water flood risk. Majority of site has a low to medium risk of surface water flood risk. Groundwater levels between 0.5m and 0.5m below surface and could be at risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site located within the Shoreham Harbour Heat Cluster Area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is partly PDL and partly open space. Open space of any form performs natural functions relating to water absorption and temperature regulation, therefore urbanisation of this space could impact upon climate change adaptation.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Site currently in use as office space. Redevelopment of the entire site would not facilitate adaptive re-use of the existing building.

13. To make the best use of land available.	+	Delivery of 20 dwellings would achieve a site density of 125dph which exceeds CPP1 minimum density targets and will help to make good use of the site, provided that the bowling green can be re-provided elsewhere.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could provide 20 dwellings. These would be delivered under the New Homes for Neighbourhoods scheme which delivers new council housing. Therefore, all housing delivered will be affordable rented.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has very good access to most services. Services within desirable walking distance include park (50m), primary schools (290m), health facilities (300m) and secondary schools (1260m). Shops located at acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	Site has very good access to most services. Services within desirable walking distance include park (50m), primary schools (290m), health facilities (300m) and secondary schools (1260m). Shops located at acceptable walking distance. Development of site would result in loss of bowling green from the site; however it is recognised that there are bowling facilities adjacent to the site, and re-provision of the bowling green nearby should not result in health impacts. Site has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is within 30% most deprived SOA (crime domain). Site can be easily accessed from various forms of public transport.
18. To increase equality and social inclusion	++	Site has potential to deliver housing under the New Homes for Neighbourhoods scheme which delivers new council housing. Therefore, all housing delivered will be affordable rented. Site within 20% most deprived SOA (employment and education domains) and therefore could provide opportunities for locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	--	Redevelopment of site for housing would result in loss of land in B1 employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any ecological interest; SDNP due to location within urban area; designated heritage assets and archaeology as does not contain any; transport due to proximity to sustainable transport and services; air quality as not within a AQMA; noise quality as site does not suffer from high levels of road noise; groundwater quality as not within a GSPZ; soil quality as site unlikely to be contaminated; community safety as site not within an area that has high crime deprivation; access and health due to proximity to services.</p> <p>Potential adverse effects:</p>



		<p>Redevelopment of site would involve loss of the bowling green from the site, which is designated open space, although it is noted that the aspirations for re-development involve re-provision of this elsewhere. Loss of open space on the site would increase the amount of urbanised land on site, which can impact upon climate change adaptation, particularly as the majority of the site has a low to medium risk of surface water flood risk. Redevelopment of the site for housing would result in loss of B1a office floorspace. Redevelopment of the site would involve demolition of existing buildings on sites and therefore development will produce waste and won't conserve natural resources. The site is adjacent to a site which is locally listed (Portslade Town Hall).</p> <p>Potential positive effects: Development of the site would have positive impacts for housing and would provide 20 all of which would be affordable rented provided through the New Homes for Neighbourhood scheme. Delivery of 20 dwellings would provide a site density of 125dph which exceeds minimum requirements helping to make good use of sites in the city. Redevelopment could incorporate opportunities for nature conservation enhancement. The site is located within a heat network opportunity area and delivery of flatted units in particular could provide the opportunity to provide communal heating. Development of the site may also provide employment/training opportunities for locally employment and education deprived communities.</p>
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**SA site assessment: Land at corner of Fox Way and Foredown Road, Mile Oak**

<b>Site Description</b>	A privately owned greenfield site consisting of designated open space of the amenity greenspace typology within the built up area boundary.
<b>Site Area</b>	0.2ha
<b>Current Use</b>	Amenity greenspace with no public access.
<b>Potential Use</b>	Potential to deliver 10 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site does not contain nor is adjacent to any ecological designations. Site is greenfield and could have some potential for ecological interest.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	Site is privately owned designated open space (amenity grassland) which would be lost through development.

3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site in close proximity to SDNP; separated from the SDNP by Fox Way road. Site therefore in a prominent position in relation to the SDNP however is within an existing established residential setting.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to any designated heritage assets and has no known archaeological potential.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-	Close access to a bus stop, with regular services. Some services within acceptable walking distance. However, site situated in location where private car could be the preferred mode of transport.
6. To reduce air and noise pollution.	++	Site not within AQMA and does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is greenfield. Site has small area at low risk of surface water flooding. Development of the site would result in an increase in urbanised form. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	--	Site is greenfield in nature and will provide ecosystem services such as temperature regulation and water absorption. Development of the site would result in an increase in urbanised form. Site size may mean that no greenfield functions / ecosystem services can be retained on site.
11. To improve soil quality	0	Site presumed not to be contaminated.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land available.	+	A site density of 50dph would be achieved in 10 dwellings are provided. It is unknown whether this would enable any ecosystem services to be retained on site, however would meet CPP1 minimum density targets.
14. To provide housing, including affordable housing, to contribute	+	Site could deliver 10 dwellings. This should include 30% affordable.

towards meeting local needs.		
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to public transport. Some services located within desirable walking distance including playground (150m), primary school (560m) and secondary school (970m). Local centre/shops (600m) and health facilities (1,200m) both located at preferred maximum.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Some services located within desirable walking distance including playground (150m), primary school (560m) and secondary school (970m). Local centre/shops (600m) and health facilities (1,200m) both located at preferred maximum. Development of site would result in loss of open space, however this is privately owned with no access and therefore should not impact physical activity. Site has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site located within 50% most deprived SOA (crime domain). Site has good access to public transport.
18. To increase equality and social inclusion	+	Site capable of delivering 30% affordable housing. Site not located within an area of employment (10% least) and education (50% least) deprivation however is adjacent to some areas with higher deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site to deliver housing only. Development of site will not result in loss of any land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: designated heritage assets and archaeology as does not contain any; air quality as not within a AQMA; noise quality as site does not suffer from high levels of road noise; groundwater quality as not within a GSPZ; soil quality as site unlikely to be contaminated; community safety as site not within an area that has high crime deprivation; access and health due to proximity to most services; development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site; economy as development would not result in any loss of employment land</p> <p>Potential adverse effects:</p> <p>Redevelopment of site would involve loss of open space of the amenity grassland typology, although it is noted that this is privately owned with no public access. Loss of open space on the site would increase the amount of urbanised land on site, which can impact upon climate change adaptation, with some of the site having a low risk of surface water flooding. Site could have some ecological interest due to the greenfield nature of the site. Site is in close proximity to the SDNP and could have landscape sensitivities, although it is adjacent to an</p>

		<p>existing residential area. Although site has good access to public transport and some services, its location on the edge of the city could impact upon car ownership and mode of travel. Site not located within a heat network opportunity area.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing and could provide 10 dwellings, 30% of which would be affordable. Delivery of 10 dwellings would provide a site density of 50dph which meets minimum requirements helping to make good use of sites in the city. Development of the site may also provide employment/training opportunities for adjacent employment and education deprived communities.</p>
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**SA site assessment: Smokey Industrial Estate, Corner of Church Road, Lincoln Road and Gladstone Road, Portslade**

<b>Site Description</b>	A brownfield site consisting of 1 storey industrial type premises and area of hardstanding.
<b>Site Area</b>	0.32ha
<b>Current Use</b>	In use and occupied by plastics buildings supplier (B use?)
<b>Potential Use</b>	Potential to deliver 32 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	A PDL site with no ecological designations and no BAP habitats. Site could offer potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage	0	Site has no heritage or archaeological designations on or adjacent to site.

assets and their settings, townscapes, buildings and archaeological sites.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to regular public transport. Site has good access to most services, which are considered to be within walking distance.
6. To reduce air and noise pollution.	--	Site within AQMA. Site suffers from high levels of road noise. Delivery of 32 dwellings could result in an increase in light vehicle movements that could impact upon air quality within the AQMA.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL and consists of an urbanised form. Part of site has risk of surface water flooding on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within Shoreham Harbour Heat cluster area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site has potential for contamination based on industrial uses, and could therefore provide the opportunity for remediation.
12. To minimise and sustainably manage waste	--	Site currently in use. Redevelopment of site for housing would not facilitate adaptive re-use of existing premises and would produce waste.
13. To make the best use of land available.	++	Delivery of 32 dwellings would achieve a site density of 100dph and would therefore exceed minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 32 dwellings. This would include 40% affordable units (13 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has very good access to public transport, including rail. Site is within desirable walking distance to primary school (130m), secondary school (1,200m), health (100m) and playground (150m). Boundary Road town centre at preferred maximum walking distance.

16. To improve health and well-being, and reduce inequalities in health.	+	Site has very good access to public transport, including rail. Site is within desirable walking distance to primary school (130m), secondary school (1,200m), health (100m) and playground (150m). Boundary Road town centre at preferred maximum walking distance. Development of site would not result in loss of any open space, however site does have poor air and noise quality which could impact upon occupier health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is within 30% most deprived SOA (crime domain). Site can be easily accessed from various forms of public transport.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 20% most deprived SOA (employment and education domains) and therefore could provide opportunities for locally deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	--	Redevelopment of site for housing would result in loss of land in B employment uses.
<b>Overall Summary and Policy Considerations</b>	Largely positive / no issues	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is also subject to high levels of road noise. Air quality and noise could impact upon occupier amenity. The site has a risk of surface water flooding. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Redevelopment of the site for housing would result in loss of land in employment uses.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 32 dwellings are provided this should include 40% affordable units, would equate to a site density of 100dph and would therefore make good use of the site. Site may have potential for contamination and therefore could result in remediation of contaminated</p>

		land. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for locally deprived communities.
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**SA site assessment: Land south of Lincoln Street Cottages, Brighton**

<b>Site Description</b>	A brownfield site enclosed behind terraces of houses, between Lincoln Street, Ewart Street and Southover Street in the low-rise, high-density residential area of Hanover, currently providing car services and garages.
<b>Site Area</b>	0.12ha
<b>Current Use</b>	In use as a car-servicing garage and other garages .
<b>Potential Use</b>	Potential for 18 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain or is adjacent to any designated nature conservation sites of BAP habitats. Site could have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site not within or adjacent to any designated heritage assets and has no known archaeological potential.
5. To reduce the need to travel by car, encourage travel by sustainable	++	Good access to a bus service with regular services. Good access and within walking distance of various services.

forms of transport and improve travel choice.		
6. To reduce air and noise pollution.	++	Not within or adjacent to AQMA. Does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and of an existing urbanised form. No risk of SW flooding or groundwater flooding on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site could have potential for contamination based on current uses and may offer opportunity for remediation.
12. To minimise and sustainably manage waste	--	Site currently in use. Development of site would not facilitate adaptive re-use, would involve demolition of existing buildings and would not conserve resources.
13. To make the best use of land available.	++	Delivery of 18 dwellings would provide a site density of 150dph which would exceed CPP1 minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to provide 18 dwellings, 40% of which would be affordable units.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Some services located within desirable walking distance including primary schools (610m) and playground (380m). Local shops (250m) and health (520m) located within acceptable walking distance. Secondary school at preferred maximum.
16. To improve health and well-being, and reduce inequalities in health.	++	Site has good access to public transport. Some services located within desirable walking distance including primary schools (610m) and playground (380m). Local shops (250m) and health (520m) located within acceptable walking distance. Secondary school at preferred maximum. Development of site would not result in loss of open space. Site has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site located within 50% most deprived SOA (crime domain).



18. To increase equality and social inclusion	++	Site capable of providing 40% affordable dwellings. Site within 30% least deprived SOA (employment and education domains), however is in fairly close proximity to SOA with higher levels of deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	--	Development of site for housing will result in loss of land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Positive/no issues	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; air and noise quality as not within an AQMA and does not suffer from high levels of road noise; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as site has very low risk of surface water flooding; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Site not located within a heat network opportunity area. Redevelopment of the site for housing would result in loss of land in employment uses.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 18 dwellings are provided this should include 40% affordable units, would equate to a site density of 150dph and would therefore make good use of the site. Site may have potential for contamination and therefore could result in remediation of contaminated land. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for nearby deprived communities.</p>

**SA site assessment: Former Belgrave Centre, Clarendon Place, Portslade**

<b>Site Description</b>	A brownfield site comprised of a former day-care centre and associated car-parking.
<b>Site Area</b>	2.5ha
<b>Current Use</b>	Vacant
<b>Potential Use</b>	Site has potential to deliver 45 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--	Site within AQMA and suffers from high levels of road noise from adjacent A259. The amount of development could result in an increase in vehicle movements that would have a significant effect on air quality in this location.
7. To improve water quality (ecological, chemical and quantity	++	Site not within zones 1, 2 or 3 of a GSPZ.

status)		
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL and of an existing urbanised form. Small part of the site has a low risk of surface water flooding. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Site currently vacant. Redevelopment of site would not provide the opportunity to facilitate adaptive re-use of existing site, would produce waste and would not preserve resources.
13. To make the best use of land available.	++	Site currently vacant. Redevelopment would bring a site back into active use, and would provide a site density of 180dph, making good use of land resources in the city.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 45 dwellings. This should provide 40% affordable dwellings (18 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Site located within AQMA and suffers from road noise which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport. Residential uses within the area could increase passive surveillance which can help to reduce the fear of crime.
18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse	-	Site will result in loss of land whose last use was B uses. However noted that the site is not currently in use.

economy increase employment opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>No issues:  Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality as site not considered to be at risk of contamination based on former uses; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:  Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is also subject to high levels of road noise. Air quality and noise could impact upon occupier amenity. Small part of site has surface water flood risk. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Redevelopment of the site for housing would result in loss of land in employment uses.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. If 45 dwellings are provided this should include 40% affordable units, would equate to a site density of 180dph and would therefore make good use of a vacant site. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities. Residential uses within the area could increase passive surveillance which can help to reduce the fear of crime.</p>

**SA site assessment: Wellington House, Wellington Road, Portslade**

<b>Site Description</b>	A commercial premises comprised of 8 units with tenants providing various services including A3, B1 and B8.
<b>Site Area</b>	0.09ha
<b>Current Use</b>	In use
<b>Potential Use</b>	Site has potential to deliver 20 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--	Site within AQMA and suffers from high levels of road noise from adjacent A259. The amount of development could result in an increase in vehicle movements that would have a significant effect on air quality in this location.
7. To improve water quality (ecological, chemical and quantity	++	Site not within zones 1, 2 or 3 of a GSPZ.

status)		
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and of an existing urbanised form. No surface water or other flood risk on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within Shoreham Harbour heat cluster opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on current uses.
12. To minimise and sustainably manage waste	--	Site in use. Site comprises a fairly modern building. Redevelopment of site would not provide the opportunity to facilitate adaptive re-use of existing site, would produce waste and would not preserve resources.
13. To make the best use of land available.	++	Site currently in use. Redevelopment would provide a site density of 222dph, making good use of land resources in the city.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 20 dwellings. This should provide 40% affordable dwellings (8 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Site located within AQMA and suffers from road noise which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport. Residential uses within the area could increase passive surveillance which can help to reduce the fear of crime.
18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse	--	Site will result in loss of land currently in B uses providing workspace for a range of businesses.

<p>economy increase employment opportunities and meet local employment needs.</p>		
<p><b>Overall Summary and Policy Considerations</b></p>	<p>Largely positive / no issues</p>	<p>No issues:  Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality as site not considered to be at risk of contamination based on former uses; flood risk as no risk of flooding on site; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:  Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is also subject to high levels of road noise. Air quality and noise could impact upon occupier amenity. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Redevelopment of the site for housing would result in loss of land in employment uses.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. If 20 dwellings are provided this should include 40% affordable units, would equate to a site density of 220dph and would therefore make good use of a vacant site. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities. Residential uses within the area could increase passive surveillance which can help to reduce the fear of crime.</p>

## H1 Mixed Use Allocations

### SA site assessment: City College (Pelham Tower and Car Park), Pelham Street, Brighton

<b>Site Description</b>	A brownfield site consisting of Pelham Tower, an 11 storey building, which forms part of the City College campus and adjacent ground-level car-park. Situated on the edge of the North Laine in close proximity to London Road.
<b>Site Area</b>	0.63
<b>Current Use</b>	Educational uses and car-park.
<b>Potential Use</b>	Potential for 75 dwellings and other uses within a mixed use scheme including student accommodation.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain nor adjacent to any nature conservation designated sites. No BAP species recorded on site. Site offers potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site is adjacent to North Laine Conservation Area and within setting of St Bartholomew's listed church which is a particularly prominent feature within the area due to its size.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops, health facilities and opportunities for recreation all less than 250m and within walking distance. Site may be able to deliver an element of low-car/car-free housing.
6. To reduce air and noise pollution.	--	Site within AQMA. Potential uses and size of site could generate the number of vehicle movements above which impacts on air quality could be significant. Parts of site also suffers from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity	++	Site not within 1, 2 or 3 of a GSPZ.



status)		
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. Site has risk of surface water flooding. Groundwater levels between 0.5 and 5m below surface which could increase risk of emergence.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within a Development Area and also within a heat network cluster area. Future development therefore offers good potential to connect to existing/future heat network.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	The site may have some potential for contamination based on current uses, e.g. workshops, chemical storage areas, historic oil storage areas and may therefore offer potential for remediation.
12. To minimise and sustainably manage waste	-	There may be potential to make use of some existing resources (building) on site however development likely to result in use of natural resources.
13. To make the best use of land available.	+	PDL site; development of which will meet minimum density targets in CPP1 for development within development areas. Delivery of 75 dwellings would provide a site density of 119dph.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis indicates 75 dwellings could be delivered on site, in addition to student bedspaces. This should include 40% affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	++	The site has good access to majority of services. Various services within desirable walking distance including shops (100m), health (250m), open spaces (200m) and primary schools (230m). Secondary schools within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	The site has good access to majority of services. Various services within desirable walking distance including shops (100m), health (250m), open spaces (200m) and primary schools (230m). Secondary schools within acceptable walking distance. The site could suffer from air and noise quality issues which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	-	Site located within SOA that is within 10% most deprived crime domain. Site could provide a range of uses which may help passive surveillance. Opportunities to design out crime should be maximised.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. If 75 dwellings are provided, this could include 30 affordable units. Site located within 20% most deprived SOA in both education and employment domain and could offer employment/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse	-	Site not in employment use although provides a number of jobs. Site identified predominantly for housing although it is recognised that any educational uses provided on site in the future will provide job opportunities.

economy increase employment opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; water quality a site not within GSPZ; climate change adaptation as site entirely PDL; access and health due to proximity to services.</p> <p>Potential adverse effects: Development of the site could raise issues with heritage assets including the North Laine Conservation and nearby listed buildings. In addition, the site is within an ANA and could raise issues with archaeology. Site is within the AQMA and any traffic to/from the site would need to travel through the AQMA. In addition, site is of the size which could generate the number of vehicle movements that could have a significant impact on air quality. Part of the site suffers from high levels of road noise which could impact on residential amenity and health. Site has risk of surface water flooding and groundwater flooding. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime. Development of site is unlikely to provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Although development of the site would not result in loss of employment land, it would result in a loss of educational jobs on site although these may be re-provided elsewhere.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 75 dwellings are provided this should include affordable units. In addition, this would provide a site density of 119dph and would be a good use of the land particularly the area that is currently used as a car park. A scheme in this location has potential to be car-free due to the accessibility of the site. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Development could connect to a future/existing heat network supporting climate change mitigation. Development of the site could result in the remediation of contaminated land which may be present on site due to current uses. The site could provide employment/training opportunities for adjacent deprived communities.</p>

**SA site assessment: 71-76 Church Street, Brighton**

<b>Site Description</b>	A brownfield site consisting of 4-storey Grade II listed building with rear warehouse and car-parking area, occupying a corner position within central Brighton.
<b>Site Area</b>	0.21ha
<b>Current Use</b>	Currently occupied by Patrick Moorhead Antiques (trade premises for antiques storage/showroom)
<b>Potential Use</b>	Potential to deliver 50 dwellings with some groundfloor employment floorspace

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	The building, including the rear warehouse is Grade II listed and is within the North Laine Conservation Area. Adjacent to Brighton historic core ANA
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to both bus and rail services. Some services within walking distance from the site. Central location could mean the suite has potential to deliver car-free housing.
6. To reduce air and noise pollution.	--/+	Site within AQMA. Delivery of 50 dwellings and employment floorspace could increase the amount of daily light vehicle movements that could have an effect on air quality in this location. Site does not suffer from high levels of road noise.
7. To improve water quality	++	Site not within zones 1, 2 or 3 of a GSPZ.

(ecological, chemical and quantity status)		
8. To reduce the risk from all sources of flooding to and from development	++	Entire site is PDL. There is no risk of flooding from any sources on the site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site is within the Brighton Centre Heat Network Opportunity Area. Heritage assets may impact on the ability to incorporate some LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	+	Site currently in use. Redevelopment would facilitate the adaptive re-use of the building and therefore preserve resources and reduce production of waste.
13. To make the best use of land available.	+	Redevelopment will help to facilitate adaptive re-use of existing buildings and make good use of land resources. Delivery of 50 dwellings would equate to a site density of 227dph which exceeds minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Potential to deliver 50 dwellings. This should incorporate affordable dwellings – 40% = 20 dwellings.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (350m). Health services (580m) and secondary schools (2,500m) within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (350m). Health services (580m) and secondary schools (2,500m) within acceptable walking distance. Development of site will not result in loss of open space, however site is within the AQMA which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	-	Site situated within 10% most deprived SOA (crime domain). Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.
18. To increase equality and social inclusion	++	Site capable of delivery 40% affordable housing. Site within 30% most deprived SOA (employment domain) and 30% least deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse	++	Site currently used as antiques trade centre. Site is not currently in B1 use. Delivery of B1 floorspace would provide new land for employment uses within a central accessible location.

economy increase employment opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Largely positive /no impacts	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; road noise as does not suffer from high levels of road noise; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality, as unlikely to be contaminated based on current use; flood risk as site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site entirely PDL and will not result in an increase in urbanised form; access and health due to proximity to services.</p> <p>Potential adverse effects: Development of the site could raise issues with heritage as the site is a Grade II listed building within a conservation area. Site also adjacent to an ANA. Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 50 dwellings are provided this should include 40% affordable units, would equate to a site density of 227dph and would make good use of land resources. Redevelopment of the existing building would facilitate adaptive re-use, help to preserve resources and reduce waste. A scheme in this location has potential to be car-free. The site is situated within a heat network cluster area and could and could incorporate energy saving technologies subject to heritage constraints. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Delivery of employment floorspace would increase employment land in a sustainable location and may also provide employment/training opportunities for locally deprived communities. Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.</p>

**SA site assessment: The Astoria, 10-14 Gloucester Place, Brighton**

<b>Site Description</b>	A brownfield site comprising a derelict Grade II listed building, formerly a bingo hall and originally built as a cinema, in a prominent position within the Valley Gardens Conservation Area.
<b>Site Area</b>	0.15ha
<b>Current Use</b>	Vacant since c.1996
<b>Potential Use</b>	Potential to deliver 70 dwellings, commercial (A1/A2/B1) uses and community (D1) use in accordance with the planning consent (BH2015/01471) (allowed on appeal). Revised application Bh2017/04022 under consideration.

**Assessment based on assumption that approved scheme will be implemented.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement. NB. Approved scheme includes a green roof.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	The buildings is Grade II listed, is within the Valley Gardens Conservation Area and adjacent to the North Laine Conservation Area. Redevelopment of the site, in accordance with the planning consent, will involve the demolition of the listed building. Principal of loss accepted by the council based on a scheme. Heritage comments on the approved scheme suggest that demolition of the building and the replacement with the new scheme would have public benefits through bringing he site back into use, preserving and enhancing the character of the Valley Gardens conservation area and positively enhancing the appearance and character of the North Laine conservation area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station and other services and facilities. Nb: planning consent does not include any on-site parking and does not allow parking permits to be gained by future residents, indicating car-free housing.
6. To reduce air and noise pollution.	--	Within AQMA. Site has no on-site parking therefore should not result in an increase in daily light vehicles that

		could affect air quality in this location. Site subject to high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	Site has surface water flooding risk and groundwater levels between 0.5 and 5m below surface which could increase risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	++	Within Brighton Centre and Edward Street heat network opportunity area. Nb. Approved scheme includes solar PV.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city. NB. Approved scheme includes a green roof.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Approved scheme includes demolition of existing building and will therefore not provide the opportunity to preserve resources and will produce waste.
13. To make the best use of land available.	++	Site has been vacant for c.20 years. Development offers potential to regenerate a derelict site and will make good use of land resources through providing a dwelling density of 466dph.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Approval to deliver 70 dwellings. Approved scheme will not provide any affordable units but will make a S106 contribution towards affordable housing in the city.
15. To improve the range, quality and accessibility to services and facilities.	++	The development includes space for D1 community use which would help increase access to this use. The site has good access to majority of services. Various services within desirable walking distance including shops (200m), health (200m), and primary schools (430m) and playground (400m). Secondary schools within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	The development includes space for D1 community use which would help increase access to this use. The site has good access to majority of services. Various services within desirable walking distance including shops (200m), health (200m), and primary schools (430m) and playground (400m). Secondary schools within acceptable walking distance. Development of site will not result in loss of open space, however site is within the AQMA and has high levels of road noise which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Although the site is situated within 10% most deprived SOA (crime domain) bringing the site back into active use can help reduce the fear of crime and support community safety. In addition, having more active mix of

		uses on this site could increase passive surveillance and also support community safety.
18. To increase equality and social inclusion	++	Although the approved scheme does not include any on-site affordable housing, it does include a S106 payment to provide off-site affordable housing. Approved scheme will provide 4 wheelchair accessible units. Site within 30% most deprived SOA (employment domain) and 30% least deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Redevelopment of site to incorporate mix of uses, including B1 will provide employment land in a sustainable location.
<b>Overall Summary and Policy Considerations</b>	Largely positive / no impacts	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations of BAP habitats/species and may provide opportunities to provides net gains; open space as site does not include designated open space; SDNP due to location within urban area; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; soil quality as site unlikely to be contaminated; climate change adaptation as site is entirely on urbanised PDL; access and health due to proximity to services.</p> <p>Potential adverse effects: The site is within the AQMA, although it is recognised that the scheme is unlikely to result in an increase in amount of daily light vehicles that would impact upon air quality as not on-site parking is proposed. The site suffers from road noise which could impact upon occupier amenity. Development will include demolition of the existing building and will therefore produce waste and will not preserve resources.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 70 dwellings are to be provided, including 4 wheelchair accessible units, also having positive equalities impacts. Although no on site affordable housing would be delivered, an off-site contribution to affordable housing was approved. Site will increase provision of employment floorspace in a sustainable location. Delivery of 70 dwellings would provide a site density of</p>



		466dph which would help to make the best use of land. The demolition of the listed buildings was accepted in principal and the approved scheme was considered to contribute to and enhance the surrounding conservation areas. Bringing the site back into use, with a mix of uses can help to reduce the fear of crime, provide opportunities for passive surveillance and supports community safety. Incorporation of LZC technologies helps mitigate against climate change. Incorporation of green infrastructure supports climate change adaptation. The site could also provide employment/training opportunities for adjacent deprived communities
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**SA site assessment: Post Office site, 62 North Road, Brighton**

<b>Site Description</b>	A brownfield site comprised of a 4 storey building fronting North road, with warehouses and area of hard-surfacing to the rear
<b>Site Area</b>	0.5ha
<b>Current Use</b>	In use as post office delivery sorting office (mix of B1a, B1c and A1)
<b>Potential Use</b>	Potential to provide 110 dwellings with 3000sqm B1 floorspace.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Within North Laine Conservation Area. Listed buildings within close proximity to rear of site on Gloucester Road.

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to both bus and rail services. Some services within walking distance from the site. Central location could mean the suite has potential to deliver car-free housing.
6. To reduce air and noise pollution.	-/+	Within AQMA. Delivery of 110 dwellings and employment floorspace may increase the amount of daily light vehicles that could have a significant effect on air quality. Site does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	Within Flood zone 1. Historical flooding incident on site. Groundwater levels between 0.5m and 5m below ground level which could increase the risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site is within the Brighton Centre Heat Network Opportunity Area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	Unlikely that the quantum of development could be achieved in the current premises. Redevelopment of the site would not facilitate adaptive re-use of the building, would produce waste and would not preserve resources.
13. To make the best use of land available.	++	Delivery of 100 dwellings would deliver a site density of 220dph and would exceed CPP1 minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could deliver 100 dwellings. This should include 40% affordable units.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (430m). Health services (4300m) and secondary schools (2,300m) within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (430m). Health services (4300m) and secondary schools (2,300m) within acceptable walking distance. Development of site would not result in loss of open space. Site within AQMA

		which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	-	Site situated within 10% most deprived SOA (crime domain). Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.
18. To increase equality and social inclusion	++	Site capable of delivery 40% affordable housing. Site within 20% most deprived SOA (employment domain) and 20% most deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Site currently used as post office delivery office in a mix of uses. Delivery of 3000sqm of B1 floorspace would help to replace any lost employment floorspace, with more modern workspace, within a central accessible location.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; road noise as does not suffer from high levels of road noise; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality, as unlikely to be contaminated based on current use; climate change adaptation as site entirely PDL and will not result in an increase in urbanised form; access and health due to proximity to services.</p> <p>Potential adverse effects: Development of the site could raise issues with heritage as the site is within a conservation area and is adjacent to listed buildings. Site is within the AQMA, any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site has suffered from a flooding incident and has risk of groundwater flooding. Total redevelopment of the site may not provide the opportunity to facilitate adaptive re-use of the existing buildings and will produce waste. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 110 dwellings are provided this should include 40% affordable units, would equate to a site density of 220dph and would make good use of land resources. A scheme in this location has potential to be car-free. The site is situated within a heat network cluster area and could and could incorporate energy saving technologies subject to heritage constraints.</p>

		Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Delivery of employment floorspace would increase new employment land in a sustainable location and may also provide employment/training opportunities for locally deprived communities. Having a more active mix of uses on this site could increase passive surveillance and support community safety.
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**SA site assessment: Former Brewery site, South Street, Portslade**

<b>Site Description</b>	A brownfield site formerly the Portslade brewery, comprised of a mix of industrial buildings of different scales, some of which are locally listed.
<b>Site Area</b>	0.35
<b>Current Use</b>	Vacant. Former brewery
<b>Potential Use</b>	Delivery of 48 dwellings including 37 flats and 11 new dwellings, and 675sqm of employment floorspace as approved under BH2016/02459.

**Assessment based on assumption that approved scheme will be implemented.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Site could have potential for some ecological interest (e.g. bats and breeding birds) however overall the site is considered to have low ecological value. Site may have potential for nature conservation enhancement. Approved scheme incorporates some bat and bird boxes.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings,	++	The brewery building is locally listed and is within the Portslade Old Village Conservation Area. The former brewery building makes a positive contribution to the Conservation Area. Some of the industrial units attached to the brewery detract from the conservation area.

townscapes, buildings and archaeological sites.		The approved scheme converts the main brewery buildings and demolishes some of the later industrial units. Overall the scheme is considered to be acceptable and will bring back into use a locally listed asset.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to regular public transport. Site has fairly good access to most services/facilities.
6. To reduce air and noise pollution.	++	Not within AQMA. Not subject to high levels of road noise. Site unlikely to be generate an increase in the amount of daily light vehicles that would significantly affect air quality in this location.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	The site itself has risk of surface water flooding, however there have been historic flooding incidents on site, and numerous others in the wider area, with this area of Portslade suffering from flooding when groundwater levels are high in particular. South Street itself has a high risk of surface water flooding. Groundwater levels between 0.5m and 5m which could increase risk of GW flooding. Approved scheme incorporates permeable paving for car-parking as well as some private garden areas.
9. To reduce emissions of greenhouse gases that cause climate change	++	Not within heat network opportunity area. Approved scheme incorporates some solar PV.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city. Approved scheme incorporates permeable paving which will support climate change adaptation.
11. To improve soil quality	?	Site could have potential for contamination, which would provide the opportunity for remediation.
12. To minimise and sustainably manage waste	++	Site currently vacant. Redevelopment would facilitate the adaptive re-use of the main building and therefore preserve resources and reduce production of waste, although it is acknowledged that some of the outer buildings will be demolished.
13. To make the best use of land available.	++	Site currently vacant. Redevelopment will bring site back into active use, will deliver a dwelling density of 137dph which will meet CPP1 minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site will provide 48 dwellings. This includes 2 on-site affordable dwellings and a S106 contributions towards off-site provision.
15. To improve the range, quality and accessibility to services and	++	Site has good access to most services. Various services within desirable walking distance including convenience store (50m), primary schools (250m), secondary schools (290m) and playground (440m). Health facilities

facilities.		(1000m) at preferred maximum.
16. To improve health and well-being, and reduce inequalities in health.	++	Site has good access to most services. Various services within desirable walking distance including convenience store (50m), primary schools (250m), secondary schools (290m) and playground (440m). Health facilities (1000m) at preferred maximum. Development of site will not result in loss of open space and has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% least deprived SOA (crime domain). Bringing a vacant premises back into use and reduce the fear of crime and provision of a mix of uses on site could increase passive surveillance at different times of the day.
18. To increase equality and social inclusion	++	Although the approved scheme only includes two on-site affordable housing, it does include a S106 payment to provide off-site affordable housing. Site within 50% most deprived SOA (employment domain) and 30% most deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	--	Although 674sqm employment floorspace is approved to be delivered, redevelopment will result in a net loss of employment floorspace.
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>The following summary is based on implementation of approved scheme. If approved scheme not implemented, then the potential for positive or negative impacts may be different.</p> <p>No issues: Development of the site (in accordance within its planning consent) is unlikely to raise any issues with the following objectives: biodiversity as site does not contain nature conservation designations and may provide opportunities to provides net gains; open space as site does not include designated open space; SDNP due to location within urban area; air quality as not within an AQMA; road noise as site does not suffer from road noise; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; climate change adaptation as site is entirely on urbanised PDL; access and health due to proximity to services.</p> <p>Potential adverse effects: Conversion and redevelopment will result in significant loss of land in employment uses. Site could have risk of surface water and groundwater flooding.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 48 dwellings are to be provided. Although</p>

		<p>only 2 on site affordable housing would be delivered, an off-site contribution to affordable housing was approved. Delivery of 48 dwellings would provide a site density of 137dph which would help to make the best use of land. Conversion of existing building will help to preserve resources and reduce waste. The conversion of a locally listed building, combined with the demolition of some buildings that detract from the conservation area, helps to bring vacant assets back into use and should positively contribute towards the conservation area. Replacement of existing hard-surfacing with permeable paving will help mitigate against surface water flood risk. Site could have potential for contamination which require remediation and improve soil quality. Bringing the site back into use, with a mix of uses can help to reduce the fear of crime, provide opportunities for passive surveillance and supports community safety. Incorporation of LZC technologies helps mitigate against climate change. The site could also provide employment/training opportunities for adjacent deprived communities.</p>
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#### SA site assessment: 27-31 Church Street, Brighton

<b>Site Description</b>	A brownfield site which has been cleared of all on-site buildings.
<b>Site Area</b>	0.12ha
<b>Current Use</b>	Derelict site
<b>Potential Use</b>	Mixed use development of 9 dwellings, 341sqm retail, 631sqm office and basement parking (approved scheme BH2012/02555) (nb: site allocated for 10 units due to site size).

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Approved scheme includes green roofs and green walls.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's	++	Site within the North Laine Conservation Area. Site within Brighton historic core ANA.

historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.		Site in close proximity to listed buildings. Presumed that approved scheme was found to be acceptable on design and heritage terms. The delivery of a scheme on a vacant site would improve the appearance of the streetscene.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to both bus and rail services. Some services within walking distance from the site.
6. To reduce air and noise pollution.	--/+	Site within AQMA. Delivery of 9 dwellings as well as employment and retail floorspace could increase the amount of daily light vehicle movements that could have an effect on air quality in this location. Site does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Entire site is PDL. There is no risk of flooding from any sources on the site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site is within the Brighton Centre Heat Network Opportunity Area. Approved scheme includes incorporation of some LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city. Approved scheme includes some green roof and green walls.
11. To improve soil quality	+	Site has potential for contamination based on former industrial uses.
12. To minimise and sustainably manage waste	0	Site is a vacant/cleared site with no buildings (cleared c.1997), therefore does not provide the opportunity to facilitate adaptive re-use and save resources.
13. To make the best use of land available.	+	Delivery of 9 dwellings would equate to a site dwelling density of 75dph which does not meet minimum density targets however the approved scheme does also include various other uses.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Site has planning consent for 9 dwellings, however size of site could accommodate a greater number of units, and the site is allocated for 10 units.
15. To improve the range, quality and accessibility to services and	++	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (350m). Health services (580m) and secondary schools (2,500m) within



facilities.		acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (350m). Health services (580m) and secondary schools (2,500m) within acceptable walking distance. Development of site will not result in loss of open space, however site is within the AQMA which could impact upon occupier health.
17. To improve community safety, and reduce crime and fear of crime.	-	Site situated within 10% most deprived SOA (crime domain). Developing a derelict site can help to reduce the fear of crime. Having a mix of uses on this site could increase passive surveillance and support community safety.
18. To increase equality and social inclusion	+	Site within 30% most deprived SOA (employment domain) and 30% least deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Approved scheme will deliver 630sqm of B1 floorspace, as well as other uses that will provide employment (retail).
<b>Overall Summary and Policy Considerations</b>	Largely positive	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; road noise as does not suffer from high levels of road noise; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site entirely PDL and will not result in an increase in urbanised form; access and health due to proximity to services; site is a cleared site and therefore will not provide the opportunity to adapt existing buildings and reduce waste.</p> <p>Potential adverse effects:</p> <p>Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing with 9 dwellings provided. This would equate</p>

		to a site density of 75dph which although less than CPP1 minimum density targets, would also enable provision of other uses on site. Development of the site could raise issues with heritage as the site is within a conservation area. Site also adjacent to an ANA. However it is assumed that the approved scheme was found to be acceptable on heritage terms. In addition, bringing a site back into use contributes positively towards improving the street scene. The approved scheme includes some LZC technologies which will help mitigate against climate change. The development also includes green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The site could have potential for contamination based on former uses, which would provide the opportunity for remediation. Delivery of employment floorspace would increase employment land in a sustainable location and may also provide employment/training opportunities for locally deprived communities. Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.
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#### SA site assessment: Former Dairy Crest Site, 35-39 The Droveway, Hove

<b>Site Description</b>	A brownfield site comprising the locally listed former dairy buildings within a residential area. Originally farm buildings and described as a good example of 19 <sup>th</sup> century farm buildings.
<b>Site Area</b>	0.44ha
<b>Current Use</b>	Vacant Formerly Dairy Crest depot. Site vacant since 2005.
<b>Potential Use</b>	Potential to deliver 14 dwellings and 500sqm B employment floorspace. Application BH2017/04050 under consideration.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site could have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and	0	Site is within core urban area and is not visually prominent from the SDNP.

its setting, and improve sustainable access to it.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site is a locally listed asset. Submitted scheme would involve some losses to this asset. Site not within a ANA. No other heritage designations.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Site has good access to regular bus services. Some essential services and facilities nearby.
6. To reduce air and noise pollution.	++	Site not within the AQMA. Site does not suffer from road noise. Site unlikely to generate an increase in daily light vehicle movements that would significantly affect air quality in this location.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL. Small part of site has low risk of surface water flooding. Groundwater levels more than 5m below ground level.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	++	Site currently vacant. Redevelopment would facilitate the adaptive re-use of the majority of the building and therefore preserve resources and reduce production of waste.
13. To make the best use of land available.	+	Potential to redevelop derelict PDL site. If 14 dwellings are delivered, this would provide a site density of 31dph, which although less than CPP1 minimum density targets would enable other uses to be delivered and reflects the character of the wider area.
14. To provide housing, including affordable housing, to contribute	+	Site has potential to deliver 14 dwellings. This should include 30% affordable dwellings (4).

towards meeting local needs.		
15. To improve the range, quality and accessibility to services and facilities.	+	Site is within desirable walking distance to a convenience store (10m), playground (400m) and secondary school (1150m). Site within acceptable walking distance to a primary school (1100m). Health services at preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site is within desirable walking distance to a convenience store (10m), playground (400m) and secondary school (1150m). Site within acceptable walking distance to a primary school (1100m). Health services at preferred maximum walking distance. Development of site would not result in any loss of open space. Site has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% least deprived SOA (crime domain). Bringing a derelict site back into use can help reduce the fear of crime. A mix of uses on site could provide opportunities for passive surveillance.
18. To increase equality and social inclusion	+	Site capable of delivering 30% affordable dwellings. Site situated within 50% least deprived SOA (employment domain) and 10% least deprived (education domain). Site not located in close proximity to any areas of employment/education deprivation and may not therefore be able to provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	Although redevelopment would involve loss of B8 floorspace, the scheme could deliver 500sqm B1 floorspace.
<b>Overall Summary and Policy Considerations</b>	Largely positive / no issues	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; air and noise quality as not within the AQMA and does not suffer from road noise; transport due to proximity to sustainable transport and services; soil quality as site not considered to be at risk of contamination based on former uses; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects: Development of the site could raise issues with heritage, as the site is locally listed. The site is within a GSPZ 2 and redevelopment could pose a risk to water quality. Site has low risk of flooding on site. Site is not within a heat network opportunity area and opportunities to incorporate LZC technologies may be limited.</p>

		<p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 14 dwellings are provided this should include 30% affordable units. This would equate to a site density of 31dph which although less than the minimum density targets would enable other uses to be delivered and reflects the character of the surrounding area. Although redevelopment would result in loss of B8 uses, it would deliver new B1 employment floorspace. Redevelopment of the site would facilitate adaptive re-use of vacant buildings, would help to preserve resources, reduce waste and bring a vacant building back into use. Bringing a vacant building back into use can help reduce the fear of crime and a mix of uses on site can help increase passive surveillance supporting community safety. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation.</p>
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#### SA site assessment: Land at 270 Old Shoreham Road, Hove

<b>Site Description</b>	A brownfield site currently comprised of a car showroom and servicing.
<b>Site Area</b>	0.34ha
<b>Current Use</b>	In use as car showroom (sui generis)
<b>Potential Use</b>	Site has potential to deliver 10 dwellings and 1000sqm B1 employment floorspace

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage	-	There are no designated heritage assets on or adjacent to the site. The site is within the Goldstone ANA

assets and their settings, townscapes, buildings and archaeological sites.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to regular public transport. Some services and facilities within walking distance.
6. To reduce air and noise pollution.	-/++	Site not within AQMA. Site suffers from road noise.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and of an existing urbanised form. No surface water or other flood risk on site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site in fairly close proximity to Hove Park heat network cluster but may not be able to connect to any future network.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site could have potential for contamination based on current/former uses and therefore provides the opportunity for remediation.
12. To minimise and sustainably manage waste	--	Site in use. Site comprises a fairly modern building. Redevelopment of site would not provide the opportunity to facilitate adaptive re-use of existing site, would produce waste and would not preserve resources.
13. To make the best use of land available.	+	Delivery of 10 dwellings would provide a site density of 29dph, however this would enable other uses to be delivered on site and reflects the character of the wider area.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Site could deliver 10 dwellings. This should include 30% affordable (3 units).
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to public transport. Site has good access to services with primary schools (900m), secondary schools (920m) and convenience store (50m) within desirable walking distance; and playground (650m) within acceptable walking distance. Health facilities (1000m) at preferred maximum.

16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (900m), secondary schools (920m) and convenience store (50m) within desirable walking distance; and playground (650m) within acceptable walking distance. Health facilities (1000m) at preferred maximum. Development of site would not result in loss of open space. Air quality is good at the site, however road noise is an issue.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% most deprived SOA (crime domain). A mix of uses on site could provide passive surveillance and support community safety.
18. To increase equality and social inclusion	+	Site could deliver 30% affordable units. Site is within 40% least SOA (employment domain) and 30% least deprived SOA (education domain) however is in fairly close proximity to some areas with high levels of deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Redevelopment of this sui generis site to provide 10 dwellings and 1000sqm B1 floorspace would provide new employment floorspace in the city.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as there are no designated heritage assets on site or in the vicinity; air quality as not within the AQMA; transport due to proximity to sustainable transport and services; flood risk as low risk of flooding on site; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with archaeology as the site is within an ANA. The site is within a GSPZ 2 and redevelopment could pose a risk to water quality. The site suffers from high levels of road noise which could impact upon occupier amenity. Site is not within a heat network opportunity area. Redevelopment of the site would not provide the opportunity to make use of existing buildings and resources and would produce waste.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 10 dwellings are provided this should include 30% affordable units. This would equate to a site density of 29dph which although less than the</p>

		minimum density targets would enable other uses to be delivered and reflects the character of the surrounding area. Redevelopment would result in delivery of new B1 employment floorspace. Site may have potential for contamination which would provide the opportunity for remediation. Having a mix of uses on site can help increase passive surveillance supporting community safety. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide training and employment opportunities for adjacent deprived communities.
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**SA site assessment: Kingsway/Basin Road North, Hove/Portslade**

<b>Site Description</b>	A brownfield site partly located along Kingsway and partly located along Basin Road North with Shoreham Harbour. The site comprises various buildings which are occupied by a range of uses and includes sites which have planning consent. Site is allocated in the JAAP as AB4 within policy CA2 Aldrington Basin.
<b>Site Area</b>	0.56ha
<b>Current Use</b>	Occupied by various businesses and retail units including Magnet, Pets at Home, Ocean Sports, and Britannia House architects. Some residential development above Britannia House currently being built.
<b>Potential Use</b>	Site has potential for 90 dwellings and A1, A2, B1 and B2 uses. (Relevant planning consents include BH2012/04044, BH2016/00784 & BH2015/04408 for some parts of the site)

(Planning consents have been taken into consideration where relevant with assessment)

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement. Planning consent approved for one of the sites includes green infrastructure including a green wall.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	+	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space. Planning consent for one of the sites includes a S106 contribution which should improve local park facilities.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.



4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Site has very good access to regular bus services. Some essential services located within close proximity; some located further from the site.
6. To reduce air and noise pollution.	--	Site within AQMA. The total amount of development could result in an increase in vehicle movements that would have a significant effect on air quality in this location. Site suffers from road noise. In addition, the site is in close proximity to the wording harbour and may be subject to work-related noise which would need to be addressed through adequate sound-proofing.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	--	Parts of the site on Basin Road North are in flood zone 3, high risk of tidal flooding. There is risk of surface water flooding on site. Groundwater levels between 0.5m and 5m below ground level which increase risk of GW flooding. Planning consent for this site awarded as it was considered the development could ensure safe access off site in a flooding event. Noted that residential uses are not located at upper levels and would not be at risk of flooding.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site located within Shoreham heat cluster opportunity area. Planning consent for part of the site includes solar PV and delivery of a zero carbon development.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city. One of the site's planning consents includes a green wall which can help support adaptation.
11. To improve soil quality	+	Site has potential for contamination based on former uses and offers potential for remediation.
12. To minimise and sustainably manage waste	+/-	Site currently in use. Redevelopment of parts of site would facilitate the adaptive re-use of the building and therefore preserve resources and reduce production of waste. However development on other parts of the site would not offer potential to make use of buildings on site.
13. To make the best use of land	+	Delivery of 90 dwellings on site would provide a site dwelling density of 160dph. In addition, other uses would

available.		be provided. This would exceed density targets in CPP1 and would help to make good use of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to provide 90 dwellings, which will include some affordable units.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to public transport. Site has good access to some services with local convenience store (100m) and playground (200m) within desirable walking distance; primary (1,200m) and secondary schools (2230m) are located within acceptable walking distance. Health facilities (1,200m) located at preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to some services with local convenience store (100m) and playground (200m) within desirable walking distance; primary (1,200m) and secondary schools (2230m) are located within acceptable walking distance. Health facilities (1,200m) located at preferred maximum walking distance. Site is within AQMA and has high levels of road noise which could impact upon health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% most deprived SOA (crime domain). Planning consent for one of the sites includes provision of private communal amenity spaces, which can increase passive surveillance and provides opportunity for community interaction. This consent also includes some commercial units at ground floor (Kingsway) level which would create an active frontage and further support community safety.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 20% least deprived SOA (employment) and 20% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	There are currently various A and B uses on site. In addition to residential uses, the site is allocated for A1, A2, B1 and B3 uses, and is likely to result in an overall net increase in B floorspace. New employment floorspace provided is also likely to be of improved quality.
<b>Overall Summary and Policy Considerations</b>	Largely positive / no issues	No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.

	<p>Potential adverse effects: Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA. The amount of development proposed for the site could result in an increase in traffic that may have a significant effect on air quality. Site also suffers from road noise and is adjacent to the Harbour which could result in noise amenity issues. Parts of site along Basin Road North are at risk of tidal flooding, although noted that planning consent for this part of the site considered that flood risks were adequately mitigated. Upper level at risk of surface water and groundwater flooding. Development of parts of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings and would result in demolition waste.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 90 dwellings are provided this should include 40% affordable units, would equate to a site density of 160dph and would therefore make good use of land. Site would also provide land in various A and B uses, and is likely to result in a net increase in B floorspace overall as well as improved quality floorspace. Site could have potential for contamination based on surrounding industrial uses and could offer potential for remediation. Site is located within a heat network cluster area and planning consent on part of site incorporate low/zero carbon technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation; planning consent for part of site includes a green wall. Site could provide employment/training opportunities for adjacent deprived communities. Mixed uses and active frontages within the area could increase passive surveillance and activity which can help to reduce the fear of crime.</p>
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**SA site assessment: Prestwich House, North Street, Portslade**

<b>Site Description</b>	A brownfield site comprising a 2-storey building and adjoining electricity sub-station within a predominantly industrial area. Site is allocated as SP1 within JAAP policy CA3 North Quayside and South Portslade.
<b>Site Area</b>	0.05ha
<b>Current Use</b>	Dance studio (D2) and car-service centre (B2)
<b>Potential Use</b>	Site has potential for mixed uses, with B uses on lower floor and 15 dwellings above

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature

		conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--/+	Site within AQMA. The amount of development is unlikely to result in an increase in vehicle movements that would have a significant effect on air quality in this location. Site does not suffer from road noise
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and of an existing urban form. No risk of flooding on site. Groundwater levels more than 5m below ground level.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site may have potential for contamination based on current uses and may offer opportunities for remediation.

12. To minimise and sustainably manage waste	--	Redevelopment of this site would not make use of existing buildings or resources on site.
13. To make the best use of land available.	+	PDI site which is currently in-use, however redevelopment providing mixed uses would provide a dwelling density of 300dph, which would exceed CPP1 density targets and make better use of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 15 dwellings. This should provide 40% affordable dwellings (6 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Noted that the site located within AQMA which could impact upon health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport. Mixed uses within the area could increase passive surveillance which can help to reduce the fear of crime.
18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	There are currently B uses on site. This would be re-provided, meaning there should not be a loss in employment land and potentially result in a net gain. New employment land may also enable the provision of improved quality employment land.
<b>Overall Summary and Policy Considerations</b>	Mainly positive / no issues	No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as majority of site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.

		<p>Potential adverse effects: Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA, although it is unlikely that this amount of development would have a significant effect on air quality. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings and would result in demolition waste. Site may result in net loss of land in B2 use.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 15 dwellings are provided this should include 40% affordable units, would equate to a site density of 300dph and would therefore make good use of land. Site would re-provide land in employment (B) uses, and would result in a net gain in B1 although a net loss on B2. Site could have potential for contamination based on current uses and could offer potential for remediation. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities. Mixed uses within the area could increase passive surveillance which can help to reduce the fear of crime.</p>
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#### SA site assessment: Regency House, North Street, Portslade

<b>Site Description</b>	A brownfield site comprising a 2-storey building within an industrial area. Site is allocated as SP4 within JAAP policy CA3 North Quayside and South Portslade.
<b>Site Area</b>	0.17ha
<b>Current Use</b>	Wholesale & Distributors (B8)
<b>Potential Use</b>	Site has potential for mixed uses, with B1 uses on lower floor and 45 dwellings above

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open

space and green infrastructure and improve sustainable access to it.		space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--/+	Site within AQMA. The amount of development could result in an increase in vehicle movements that would have a significant effect on air quality in this location. Site does not suffer from road noise
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL and of an existing urban form. Risk of surface water flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site may have potential for contamination based on industrial uses and may offer opportunities for remediation.
12. To minimise and sustainably	--	Redevelopment of this site would not make use of existing buildings or resources on site.

manage waste		
13. To make the best use of land available.	+	PDL site which is currently in-use, however redevelopment providing mixed uses would provide a dwelling density of 265dph, which would exceed CPP1 density targets and make better use of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 45 dwellings. This should provide 40% affordable dwellings (18 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (550m) and shops (130m) within desirable walking distance; and health (650m), playground (550m) and secondary schools (1800m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Noted that the site located within AQMA which could impact upon health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport. Mixed uses within the area could increase passive surveillance which can help to reduce the fear of crime.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	There are currently B8 uses on site. The site is allocated for B1 uses, so although there may be a net loss in B8 there would be a net gain in B1. New employment land may also enable the provision of improved quality employment land.
<b>Overall Summary and Policy Considerations</b>	Mainly positive / no issues	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA. The</p>



		<p>amount of development proposed for the site could result in an increase in traffic that may have a significant effect on air quality. Surface water flood risk of site. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings and would result in demolition waste. Development could result in loss land in B8 uses.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 45 dwellings are provided this should include 40% affordable units, would equate to a site density of 265dph and would therefore make good use of land. Site would re-provide land in employment (B) uses, and would result in a net gain in B1 although a net loss on B8. An improved quality employment land would be provided. Site could have potential for contamination based on surrounding industrial uses and could offer potential for remediation. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities. A wider mix of uses within the area could increase passive surveillance which can help to reduce the fear of crime.</p>
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**SA site assessment: Flexer Sacks, Wellington Road, Portslade**

<b>Site Description</b>	A brownfield site comprising a 2-storey building within an industrial area. Site is allocated as SP5 within JAAP policy CA3 North Quayside and South Portslade.
<b>Site Area</b>	0.6ha
<b>Current Use</b>	In use as car-wash (ground floor) and gym/fitness studios (D2).
<b>Potential Use</b>	Site has potential for mixed uses, with B1 uses on lower floor and 45 dwellings above. D uses also permitted provided compatible with other B and C uses.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.

2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--	Site within AQMA. The amount of development could result in an increase in vehicle movements that would have a significant effect on air quality in this location. Site suffers from road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and of an existing urban form. No risk of flooding on site. Groundwater levels more than 5m below ground level.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site may have potential for contamination based on industrial uses within the area and may offer opportunities for remediation.

12. To minimise and sustainably manage waste	--	Redevelopment of this site would not make use of existing buildings or resources on site.
13. To make the best use of land available.	+	PDL site which is currently in-use, however redevelopment providing mixed uses would provide a dwelling density of 75dph. This would make better use of the site although does not meet minimum targets for density within development areas.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 45 dwellings. This should provide 40% affordable dwellings (18 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (500m) and shops (170m) within desirable walking distance; and health (600m), playground (550m) and secondary schools (1800m) all within acceptable walking distance. D uses also permitted on site, subject to them being compatible with other uses although it is likely there will be a net loss of land in D uses.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (500m) and shops (170m) within desirable walking distance; and health (600m), playground (550m) and secondary schools (1800m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Noted that the site located within AQMA and has noise issues which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities	+	There are currently B2 and D uses on site. The site is allocated for B1 uses, and permits some D uses, so although there may be a net loss in B2 there would be a net gain in B1. New employment land may also enable the provision of improved quality employment land.
<b>Overall Summary and Policy Considerations</b>	Mainly positive / no issues	No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as majority of site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site already entirely PDL; access and health due to proximity to services and potential to

	<p>provide some D uses; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects: Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA. The amount of development proposed for the site could result in an increase in traffic that may have a significant effect on air quality. Site also suffers from road noise and is adjacent to the Harbour which could result in noise amenity issues. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings and would result in demolition waste. Development of site may result in loss of land in B2 uses, and net loss of land in D uses.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 45 dwellings are provided this should include 40% affordable units, would equate to a site density of 75dph and would therefore make good use of land, although it is noted the density is less than CPP1 density targets. Site would re-provide land in employment (B) uses, and would result in a net gain in B1 although a net loss on B2. An improved quality employment land would be provided. Site could have potential for contamination based on surrounding industrial uses and could offer potential for remediation. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities.</p>
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**SA site assessment: Church Road/Wellington Road/St Peters Road, Portslade**

<b>Site Description</b>	A brownfield site comprising numerous buildings including a 1 storey building and a 4 storey building in proximity to the South Portslade industrial area.
<b>Site Area</b>	0.7ha
<b>Current Use</b>	In various B uses including occupied by Hove Car Spares, builders merchants, iron designs.
<b>Potential Use</b>	Site has potential for mixed uses, with B1, B2, B3 permitted on the southern side of the site, and 25 dwellings on the north side of the site.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain

a net gain in biodiversity.		BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--	Site within AQMA. The amount of development could result in an increase in vehicle movements that would have a significant effect on air quality in this location. Site suffers from road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL and of an existing urban form. Some areas of high surface water flood risk on site. (c<10%) Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.

11. To improve soil quality	+	Site may have potential for contamination based on industrial uses within the area and may offer opportunities for remediation.
12. To minimise and sustainably manage waste	--	Redevelopment of this site would not make use of existing buildings or resources on site.
13. To make the best use of land available.	+	PDL site which is currently in-use, however redevelopment providing mixed uses would provide a dwelling density of c250dph (25 dwellings on c.01ha of site).This would make better use of the site and meets CPP1 dwelling density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 25 dwellings. This should provide 40% affordable dwellings (10 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (200m), health (200m), and playground (200m) within desirable walking distance; and shops (600m)and secondary schools (1800m) all within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (200m), health (200m), and playground (200m) within desirable walking distance; and shops (600m)and secondary schools (1800m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Noted that the site located within AQMA and has noise issues which could impact upon occupier amenity.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport. Mixed uses within the area could increase passive surveillance which can help to reduce the fear of crime.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities	++	There are currently various B uses on site. The site is allocated for B1, B2 and B3 uses, and is likely to result in an overall net increase in B floorspace. New employment land may also enable the provision of improved quality employment land.
<b>Overall Summary and Policy Considerations</b>	Mainly positive / no issues	No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation on within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; climate change adaptation as site already entirely PDL; access and health due to

		<p>proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:  Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA. The amount of development proposed for the site could result in an increase in traffic that may have a significant effect on air quality. Site has risk of surface water flooding; Site also suffers from road noise and is adjacent to the Harbour which could result in noise amenity issues. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings and would result in demolition waste.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. If 25 dwellings are provided this should include 40% affordable units, would equate to a site density of 250dph and would therefore make good use of land. Site would provide land in various employment (B) uses, and is likely to result in a net increase in B floorspace overall. An improved quality employment land would also be provided. Site could have potential for contamination based on surrounding industrial uses and could offer potential for remediation. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities. Mixed uses within the area could increase passive surveillance which can help to reduce the fear of crime.</p>
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**SA site assessment: Station Road, Portslade**

<b>Site Description</b>	A brownfield site comprising a 1 storey building occupier by Kwik Fit. Site is allocated as SP7 within JAAP policy CA3 North Quayside and South Portslade.
<b>Site Area</b>	0.17ha
<b>Current Use</b>	In B2 use (car-service centre)
<b>Potential Use</b>	Site has potential for mixed uses, with A1, A2, A3 and B1 permitted on site fronting Station Road, and 15 dwellings on the rear of the site and on upper storeys.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.

2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	--/+	Site within AQMA. The amount of development is unlikely to result in an increase in vehicle movements that would have a significant effect on air quality in this location. Site does not suffer from road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL and of an existing urban form. No risk of flooding on site. Groundwater levels more than 5m below ground level.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat cluster area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	+	Site may have potential for contamination based on current use and may offer opportunities for remediation.
12. To minimise and sustainably	--	Redevelopment of this site would not make use of existing buildings or resources on site.



manage waste		
13. To make the best use of land available.	+	PDL site which is currently in-use, however redevelopment providing mixed uses would provide a dwelling density of c88dph. This would make good use of the site, although is less than CPP1 dwelling density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has potential to deliver 15 dwellings. This should provide 40% affordable dwellings (6 units).
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to public transport. Site has good access to services with primary schools (6500m), playground (450m), shops (0m) within desirable walking distance; and health (550m) and secondary schools (1600m) all within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Site has good access to services with primary schools (6500m), playground (450m), shops (0m) within desirable walking distance; and health (550m) and secondary schools (1600m) all within acceptable walking distance. Development of site would not result in any loss of open space on site. Noted that the site located within AQMA which could impact upon health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site within 40% most deprived SOA (crime domain). Site can be easily accessed by public transport.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 40% least deprived SOA (employment) and 50% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities	++	There are currently B2 uses on site. The site is allocated for A uses, which would provide employment and would be suitable for the district centre location, and B1 uses. Although this would result in net loss of B2 floorspace it would result in net gain in B1 floorspace. New employment land may also enable the provision of improved quality employment land.
<b>Overall Summary and Policy Considerations</b>	Mainly positive / no issues	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA. The</p>

	<p>amount of development proposed for the site is unlikely to have a significant effect on air quality. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings and would result in demolition waste.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 15 dwellings are provided this should include 40% affordable units, would equate to a site density of 88dph and would make good use of land. Site would provide land in various A uses, which would accord well with the District Centre status, as well as employment (B1) uses. An improved quality employment land would also be provided. Site could have potential for contamination based on current uses and could offer potential for remediation. Site is located within a heat network cluster area and could incorporate energy saving technologies. Development could provide opportunities for nature conservation enhancement including green infrastructure which would support climate change adaptation. Site could provide employment/training opportunities for adjacent deprived communities.</p>
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## H2 Urban Fringe Housing Site Allocations

### SA site assessment: Urban Fringe Site 1, Land at Oakdene, Southwick Hill and Site 2, Land west of Mile Oak Road, Portslade

<b>Site Description</b>	Publically accessible designated open space of the natural/semi-natural typology and some undesignated open space, immediately adjacent to the SDNP. Site 2 is an SNCI.
<b>Site Area</b>	Sites 1 and 2 = 4.75ha
<b>Current Use</b>	Open spaces used for recreational purposes and horse grazing.
<b>Potential Use</b>	30 dwellings on 1.12ha of site

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	All of site 2 comprises the Oakdene Southwick Hill, SNCI designated due to presence of Red Star Thistle. UFA 2015 found the sites supported mostly common and widespread habitats, although noted that biological records indicated presence of lowland calcareous grassland in the east of site 2. Habitats offered potential for a range of species including notable or protected species.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprises publically accessible open spaces of the natural/semi-natural typology as well as some undesignated open space. Residential development on the site would result in losses in some areas of publically accessible open spaces.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Sites 1 and 2 are adjacent to the SDNP, separated by a hedgerow, however landscape qualities are compromised by urbanising influences, such as the double line of pylons which cuts across the site. The sites are visible as open space from certain areas within the SDNP, although is obscured by vegetation from other viewpoints. The sites are visible as open space from certain areas within the SDNP, although is obscured by vegetation from other viewpoints.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	No heritage assets on site or in close proximity and no known archaeological potential.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve	-	Some services within acceptable walking distance. Close access to a bus stop, however bus service only every 20 minutes. More frequent buses c.500m from site. However, site situated in location where private car is likely to be the preferred mode of transport.

travel choice.		
6. To reduce air and noise pollution.	++	Site outside the AQMA. Amount of development proposed for the site unlikely to generate numbers of traffic that would have a significant impact on air quality. Site not subject to high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ 1,2 or 3.
8. To reduce the risk from all sources of flooding to and from development	+	Site consists of open spaces which provide greenfield functions. Site within flood zone 1. No risk of surface water flooding. Groundwater levels more than 5m below ground level.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.75% of site) will retain greenfield functions.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land available.	+	A housing density of 27dph would be achieved on that part of the site developed if 30 dwellings are delivered. This is reflective of the wider area but is lower than the minimum targets expected through CP14 however takes into consideration the need to reduce likelihood of other adverse effects such as landscape. This would enable some ecosystem services to be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 30 dwellings would contribute towards local housing need. Site should deliver 12 affordable units. As an urban fringe site, family type housing may be able to be delivered.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to sustainable transport provision, although service is fairly infrequent. Some services within acceptable walking distance including primary and secondary schools (900m) and health facilities (670m); shops at preferred maximum (650m) and playground more than preferred maximum (900m).
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to sustainable transport provision, although service is fairly infrequent. Some services within acceptable walking distance including primary and secondary schools (900m) and health facilities (670m); shops at preferred maximum (650m) and playground more than preferred maximum (900m). Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however recognised that large amount of site being retained in open space uses and the site

		is immediately adjacent to open spaces within the SDNP. Site has good air quality and does not suffer from road noise.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is within 50% most deprived SOA (crime domain) and therefore is not considered to be at risk of crime. Development on the site could increase activity which can provide passive surveillance.
18. To increase equality and social inclusion	++	Site would provide 40% affordable housing. Site is within 40% most deprived (employment domain) and 20% most deprived (education/skills domain) and could provide employment/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and...	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: heritage and archaeology as there are no designated heritage assets on or near the site; air and noise quality as site is located outside the AQMA and is not subject to high levels of road noise; water quality as site outside the GSPZ; soil quality as site unlikely to be contaminated; economy as development would not result in any loss of employment land; access to services and health, as the site has reasonable access to most services; site has no risk of surface water or groundwater flooding; community safety as site within an area of low crime deprivation. Development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity as part of site is an SNCI and has habitats within LBAP and protected species, although it is noted that the UFA2015 concluded that mitigation including enhancement of SNCI, restoration of calcareous grassland and retention of red star thistle should reduce the potential of significant adverse effect; loss of open space; landscape due to proximity to SDNP although it is noted that the UFA 2015 concluded that development restricted to the eastern edge of the site adjacent to Mile Oak Road would not result in a significant landscape effect; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. In addition public transport access is limited which could influence travel choice. Loss of open space could also impact upon health, although it is recognised that only approximately 24% of site area is allocated for housing, and the open spaces within the SDNP can be easily accessed from the vicinity for recreational purposes.</p>

		<p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 30 housing units are provided, this should include 40% affordable dwellings and the site may also be suitable for family type housing. Although delivery of 30 units would only provide a site density of 27dph, this would be in character with the surrounding area and would enable greenfield/ecosystem services to be retained on the site, such as SUDS and flood prevention measures, helping to make good use of the site and having wider environmental benefits. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>
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**SA site assessment: Sites 4, 4a, 4b, 5, 5a and 6: Land at Mile Oak Road, Portslade**

<b>Site Description</b>	A cluster of mainly privately owned site situated to the north of Mile Oak, adjacent to the A27. Sites comprise some areas of designated open space of the natural/semi-natural typology (5a) and allotments (6), and a SNCI which covers site 5 and 5a. Site 6 is publically owned and does not form part of the site allocated.
<b>Site Area</b>	13.52ha
<b>Current Use</b>	Used informally for recreation purposes, as well as for horse grazing.
<b>Potential Use</b>	125 dwellings across site 4b, 5 and 5a (in accordance with approved planning consent BH2017/02410); 70 dwellings across sites 4 and 4a. 6.29 of the site developed in total (3.99ha and 2.3ha). Site 6 (allotments) has not been allocated for development and will therefore remain in allotment uses.

**Nb: This assessment splits results as follows: “4b, 5 and 5a” and “4 and 4a” where required. Site assessment for cluster 4b, 5 and 5a takes into consideration the approved planning application when scoring.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	<p><u>4b,5,5a</u>: Sites 5 and 5a comprise the Mile Oak Fields SNCI in its entirety, designated for a number of notable species including rough grassland flora, badger and skylark. Biological records indicate presence of protected/notable species. UFA 2015 found the sites to contain a variety of habitats, including those within the LBAP such as hedgerows, although these were species poor, and semi-improved neutral grass-lands which potential for a range of species.</p> <p>Approved scheme includes retention of 58% of SNCI, including the wooded area and area of chalk grassland, requires positive management of other grassland habitats on site to encourage spread of chalk grassland, and grassland management in an off-site LNR which would result in overall net gains in biodiversity. Other mitigation measures were considered to be appropriate, including that for protected/notable species.</p>

	0	<u>4 and 4a:</u> There are no nature conservation designations on the site, although is immediately adjacent to the SNCI. UFA 2015 found these sites to contain semi-improved neutral grasslands and species poor hedgerow, which is LBAP habitat. Recommendations of UFA 2015 included enhancement of retained habitats and increasing robustness of SNCI, which forms part of the above approved scheme. Impacts of development on this site therefore considered to be neutral.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++  0	<u>4b,5,5a:</u> Site (5a) is privately owned designated open space (natural/semi-natural) and site 6 is allotments. The remainder of the site is not designated. The site allocated for actual development does not include sites 5a and 6, which will be retained in open space uses. The approved scheme retains 5a in its current form as natural/semi-natural open space and will therefore not result in any losses on this site. The remainder of site 5 and 4b will become publically accessible open space, through delivery of the scheme, therefore increasing provision. The approved scheme also includes footpaths through parts of the SNCI on site 5 and 5a, and also through site 4b, which should improve access to open space. <u>4 and 4a:</u> Sites do not contain any designated open space. Development on this site therefore considered to be neutral.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0  0	<u>4b,5,5a:</u> Site is separated from the SDNP by the A27 which introduces an urbanising influence into the landscape. UFA 2015 found that development would have some degree of landscape impact, with lowest impact arising from development on 4a and the lower slopes of sites 4, 4b and 6 and more significant adverse impacts arising from development on sites 5 and 5a. UFA 2015 concluded development can be delivered without significant adverse impacts provided that development is minimised on the upper slopes of 4b and permeability is maintained to retain sight lines through to downland. Approved scheme does not include any development on site 4b and was found to be acceptable on landscape grounds, although having a neutral rather than a positive effect, provided that development was of a certain scale and that tree planting was incorporated throughout the scheme.  <u>4 and 4a:</u> Site opposite existing residential development. UFA2015 found development on site 4a and the lower slopes of 4 to have the lowest landscape effect of the cluster of sites. UFA 2014 found that development on these sites would not be out of keeping with the pattern of development on the eastern side of Mile Oak Road and would not significantly interfere with views.. Impacts considered to be neutral.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and	-	There are no designated heritage assets on or adjacent to the site. <u>4b,5,5a:</u> The Mile Oak ANA covers a large proportion of the site. UFA2015 found the area to have very high archaeological potential, particularly on the higher grounds of sites 5 and 5a. A programme of archaeological works and investigation would be required to assess and investigate potential, with remains being removed

archaeological sites.	-	and recorded or preserved in situ. <u>4 and 4a:</u> A small proportion of the site, on the north-eastern corner, is within the Mile Oak ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-	<u>All sites:</u> Site has very good access to a regular bus service. Range of essential services situated within walking distance from site. However site located so that car is likely to be the preferred mode of transport for anything other than local trips.
6. To reduce air and noise pollution.	--	<u>All sites:</u> Site not within AQMA. Delivery of 195 houses will increase the average amount of vehicle movements to the area and this could exceed the amount over which significant impacts on air quality are likely (more than 500AADT). All of the site suffers from high levels of road noise from the A27 which could impact on occupier amenity. Noted that the air quality consultation comments for 125 units on sites 4b, 5 and 5a found impacts on the Portslade AQMA to be negligible.
7. To improve water quality (ecological, chemical and quantity status)	--	<u>All sites:</u> Entire site within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	-	<u>All sites:</u> Site within flood zone 1. Some small areas of surface water flood risk across sites (5) and surface water flood risk along western edge of sites 4 and 4a. Development across the site will result in urbanisation of a greenfield site. Noted that the approved scheme includes some attenuation ponds.
9. To reduce emissions of greenhouse gases that cause climate change	-	<u>All sites:</u> Site not within heat network opportunity area. No LZC technologies proposed in approved scheme, nor does the design/layout incorporate a passive design approach.
10. To increase the city's resilience and ability to adapt to climate change.	-	<u>All sites:</u> Site is greenfield in nature. Approximately 54% of the entire cluster of sites will remain undeveloped and will therefore retain some greenfield functions/ecosystem services.
11. To improve soil quality	0	<u>All sites:</u> Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	<u>All sites:</u> Greenfield site with no buildings on site which could be adapted/re-used.
13. To make the best use of land available.	+	<u>All sites:</u> Delivery of 195 dwellings across 6.29 hectares of the site equates to a density of 31dph. Although this is lower than the CP14 minimum density targets, this would be in character with the wider area and would help minimise risk of other adverse impacts, such as landscape and ecology.
14. To provide housing, including	++	<u>All sites:</u> Delivery of 195 dwellings would make a significant contribution towards housing need. 50 of the 125



affordable housing, to contribute towards meeting local needs.		dwellings approved will be affordable (40%). Remainder of site should deliver 40% affordable units and could provide family type housing.
15. To improve the range, quality and accessibility to services and facilities.	++	<u>All sites:</u> Site has good access to regular public transport. Local shop (200m), primary (720m) and secondary (740m) schools all located within desirable walking distance; health services (720m) located within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	<u>All sites:</u> Site has good access to regular public transport. Local shop (200m), primary (720m) and secondary (740m) schools all located within desirable walking distance; health services (720m) located within acceptable walking distance. Although site will result in loss of open space that is used informally for recreation, it is noted that this is privately owned, and that redevelopment of sites 4b, 5 and 5a will result in improved access to open spaces, having health benefits. Site does not suffer from poor air quality, however does suffer from road noise which would need to be addressed through design.
17. To improve community safety, and reduce crime and fear of crime.	++	<u>All sites:</u> Site situated within 10% least deprived SOA (crime) domain.
18. To increase equality and social inclusion	++	<u>All sites:</u> Site should deliver 40% affordable housing. Site situated within 40% least deprived SOA (employment) domain and 40% most deprived (education) domain, however is adjacent to some more deprived SOA and could offer training/employment opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site to deliver housing only.
<b>Overall Summary and Policy Considerations</b>	Mixed	Development of the site (in accordance with the planning approval for part of the site) is unlikely to raise any issues with the following objectives: biodiversity due to retention of existing and improvement/creation of grassland habitats within the SNCI and elsewhere, and provided that mitigation for protected/notable species is implemented; open space as majority of site is privately owned and development will result in improvements to access and increase provision of publically accessible open space; heritage designations as there are none on site; landscape (based on approved scheme) provided that screening planting is provided and development on 4 and 4a avoids upper slopes; soil quality as site not known to be contaminated; economy as development would not result in any loss of employment land; access to services and health, as the site has reasonable access to most services; community safety as site situated in area of low crime deprivation. Development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.

	<p>Potential adverse effects: Development of the site could raise issues with archaeology as the site is within a ANA and has very high potential for archaeology; transport, despite good public transport and close access to services, the suburban nature/location of the site which may influence car ownership/travel choice; air/noise quality as although outside the AQMA, the site may result in an increase in vehicle movements which could adversely affect air quality in this location and the site is subject to road noise which could impact upon occupier amenity; water quality as site within GSPZ 1; flood risk as parts of site have risk of surface water flooding; climate change mitigation as site not within a heat network and approved scheme does not include any LZC technologies; climate change adaptation as development will result in urbanisation of almost half of a site of natural form which provides greenfield functions/ecosystem services.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 195 housing units are provided, this should include 40% affordable dwellings and the site should be suitable for family type housing. Although delivery of 195 units would only provide a site density of 30dph, this would be in character with the surrounding area and enables open spaces and habitats to be retained on the site, helping to make good use of the site, having wider environmental benefits and helping to reduce adverse landscape and ecological impacts. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities. In addition, development will result in privately owned open space becoming publically accessible, as well as improved habitats within the retained SNCI and elsewhere.</p>
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### SA site assessment: Benfield Valley, Hangleton

<b>Site Description</b>	Publically accessible designated open space (natural/semi-natural) which forms a green wedge from the SDNP into the city. Entire site is an SNCI. Site includes Benfield Barn Listed Building and Conservation Area. .
<b>Site Area</b>	Sites 11 and 12 = 19.4ha
<b>Current Use</b>	Northern part of the site in use as a golf course, which may change to foot golf.
<b>Potential Use</b>	100 residential dwellings (set out in policy H2) on 1.6ha of site.

**Nb: assessment does not take into consideration any mitigation or implementation of other policies, and purely looks at constraints.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Entire site comprises the Benfield Valley SNCI, trees with TPOs and UFA 2015 identified wide range of habitat types offering potential for a range of species. Some habitats recognised as priority habitats in LBAP.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprises publically accessible open spaces of the natural/semi-natural typology (south of Hangleton Lane) and golf course (north of Hangleton Lane). Residential development on the site would result in losses in some areas of publically accessible open spaces.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	--	Site forms part of a larger site that forms a green wedge stretching 1.5km from the SDNP into the city and has an important landscape role, although is separated from the SDNP by the A27. Site has extensive tree cover on the borders which gives an undeveloped character and therefore some continuity exists between the landscape of the SDNP and the site. Some areas of the site prominent from the SDNP. All areas of the site are sensitive to development however some areas could be developed without the green wedge being compromised. UFA 2015 concluded that >30 dwellings would result in significant adverse impacts.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site includes Benfield Barn Listed Building and Benfield Barn Conservation Area. St Helen's Church Listed Building is visible from the site. The Benfield Barn Conservation Area, which includes the listed barn, is on the heritage at risk register, due to its condition. ANA across northern part of site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Although the site is close to a regular bus services (c.150m from part of site with residential potential), access is over Hangleton Link Road which is not particularly pedestrian friendly. Health and shops both located c. 1,000m from site. Site located in close proximity to A27 and travel by car may be preferred mode of transport. Vehicle movements in and around this area already very high due to the road linking to the A27.
6. To reduce air and noise pollution.	--	Site not within AQMA. Delivery of 100 houses will increase the average amount of vehicle movements to the area and this could exceed the amount over which significant impacts on air quality are likely (more than

		500AADT). All of the site suffers from high levels of road noise from both the Hangleton Link Road and A27 which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1,2 or 3 of a Groundwater Source Protection Zone.
8. To reduce the risk from all sources of flooding to and from development	+	Site consists of open spaces which provide greenfield functions. Site situated within flood zone 1. Site has no risk of surface water flooding, including the area with potential for residential development. Groundwater levels situated more than 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site will retain some greenfield functions.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site is predominantly open space with few existing buildings on site.
13. To make the best use of land available.	+	Delivery of 100 dwellings on part of the site would achieve a site density of c.63dph on that part of the site and would meet minimum density targets as required by CPP1. Greenfield functions would be retained on remainder of site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 100 dwellings would make a significant contribution towards housing need. Site should deliver 40 affordable units. As an urban fringe site, family type housing may be able to be delivered.
15. To improve the range, quality and accessibility to services and facilities.	-	Some services considered to be within acceptable walking distance including primary (c800m) and secondary (700m) schools. Health (1,000m) at preferred maximum walking distance and shops more than preferred walking distance (1,100). Pedestrian access would need to be improved to ensure site is linked to other areas, in particular to sustainable transport.
16. To improve health and well-being, and reduce inequalities in health.	-	Some services considered to be within acceptable walking distance including primary (c800m) and secondary (700m) schools. Health (1,000m) at preferred maximum walking distance and shops more than preferred walking distance (1,100). Pedestrian access would need to be improved to ensure site is linked to other areas. Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however recognised that large amount of site being retained in open space uses. Site has good air quality but does suffer from road noise.

17. To improve community safety, and reduce crime and fear of crime.	+	Site within 20% least deprived SOA (crime domain). Development of site would increase passive surveillance which could benefit community safety. Site not currently accessible by any mode of transport and would need improving.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable dwellings. Site itself not within an area of high employment or education deprivation, however is fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses although it is recognised that parts of the site provide economic activity (e.g through golf provision).
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: water quality as site located outside a GSPZ; flood risk as there is no risk of tidal/fluvial/surface water flooding on site; soil quality as site unlikely to be contaminated; economy as development would not result in loss of employment land. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity as site is an SNCI and has habitats within LBAP and protected species although it is noted the UFA2015 concluded that the areas for development were considered to be of relatively low ecological value which could be mitigated including through enhancements to retained habitats; loss of open space; designated heritage assets as site contains listed building, conservation area and an ANA, although it is recognised that these are not within the area with residential potential and it is noted that the UFA 2015 concluded that there should not be significant impacts on the setting of heritage assets provided the development area was not extended to the north and that archaeological constraints are unlikely to be of national significance that would be an insurmountable constraint to development; landscape due to proximity to SDNP and role of site in forming a green wedge from SDNP and it is noted that the UFA2015 concluded that effects of 30 dwellings would be significant until new mitigation screening reaches maturity; air quality, as although situated outside the AQMA, the amount of development proposed could generate an amount of vehicle movements that could have a significant impact on air quality; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. In addition, road noise is an issue on the site and some</p>

		<p>services are located some distance from the site, which could impact upon access, health and transport movements. Loss of open space could also impact upon health, although it is recognised only 8% of site area is allocated for housing.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 100 housing units are provided, this should include 40% affordable and the site may be suitable for family-type housing. Delivery of 100 dwellings would provide a site density of 63dph which is more than that expected by CP14, and should therefore make good use of the site as well as enable some greenfield functions/ecosystem services to be retained across the remained of the wider site, such as SUDS and flood prevention measures having wider environmental benefits. Development may help increase active uses in the area and support community safety. Development could provide employment/training for adjacent deprived communities.</p>
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**SA site assessment: Site 16, Land at and adjoining Horsdean Recreation Ground, Patcham**

<b>Site Description</b>	Publically accessible designated open space of various typologies including natural/semi-natural, allotments and outdoor sports. Site adjacent to the A27.
<b>Site Area</b>	6.32ha
<b>Current Use</b>	Open spaces used for recreation and outdoor sports.
<b>Potential Use</b>	25 dwellings on 1.17ha of the site

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site does not include any nature conservation designations, however contains natural/semi-natural open space which could have biodiversity interest.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprises publically accessible open spaces of the various typologies. Residential development on the site would result in losses in some areas of natural/semi-natural accessible open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable	-	The site is separated from the SDNP by the A27 and the slopes to the east and west have some landscape sensitivity as are intervisible with the SDNP and have some degree of landscape character connectivity with the wooded slopes of Coney Hill. However, there is no strong landscape relationship between the scrub nature of

access to it.		site and the open downland of the SDNP to the north.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	The area allocated for housing is within the Horsdean ANA. The site is in fairly close proximity to the Patcham Conservation Area which includes various listed buildings. Various Scheduled Monuments within 1000m of the site. The open spaces form an important part of the setting of the Conservation Area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Good access to a bus service offering regular services. Some services (shops and schools) located within acceptable walking distance. Health services some distance from site.
6. To reduce air and noise pollution.	-/++	Site outside the AQMA and unlikely to generate change in average vehicle flow which would significantly impact upon air quality. Site suffers from road noise from the A27 of between 60-69 dcbIs which could impact upon occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site within GSPZ 2 and therefore development could impact upon water quality.
8. To reduce the risk from all sources of flooding to and from development	-	Site consists of open spaces which provide greenfield functions. Site situated within flood zone 1. None of allocated site has any risk of surface water flooding, although there is a low to high risk of flooding on part of the area that forms the outdoor sports pitch, and development on the allocated site could increase flood risk to this area due to the increase in urbanised form. Groundwater levels between 0.5 and 5m below surface which could increase risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.82% of site) will retain greenfield functions.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land available.	+	A housing density of 21dph would be achieved on that part of the site developed if 25 dwellings are delivered. This is slightly higher than the wider area but is lower than the minimum targets expected through CP14. However takes into consideration the need to reduce other adverse effects such as landscape. This would

		enable some ecosystem services to be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 25 dwellings would contribute towards local housing need. Site should deliver 10 affordable units. As an urban fringe site, family type housing may be able to be delivered.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to sustainable transport provision with fairly regular service. Most services within acceptable walking distance including shops (430m), schools (550m secondary and 860m primary), and playground 100m. Health facilities more than preferred maximum walking distance (2,200m).
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to sustainable transport provision with fairly regular services. Most services within acceptable walking distance including shops (430m), schools (550m secondary and 860m primary), and playground 100m. Health facilities more than preferred maximum walking distance (2,200m). Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however recognised that large amount of site being retained in open space uses and the site has reasonable access to the open spaces within the SDNP. Site has good air quality but does suffer from road noise.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is within 50% most deprived SOA (crime domain) and therefore is not considered to be at risk of crime. Development on the site could increase activity which can provide passive surveillance.
18. To increase equality and social inclusion	++	Site has potential to provide 40% affordable dwellings. Site is within 20% least deprived SOA (both employment and education domains), however is in fairly close proximity to some areas of higher employment and skills deprivation, and could provide opportunities to increase skills/employment.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: air quality as site is located outside the AQMA; soil quality as site unlikely to be contaminated; economy as development would not result in any loss of employment land; access to services, health and transport, as the site has good access to most services as well as sustainable transport access. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity as the site allocated for development comprises</p>



		<p>natural/semi-natural open space which could have biodiversity interest although it is recognised that the site is not designated as a site for nature conservation interest ; loss of open space; landscape due to proximity to SDNP although it is noted that the UFA 2015 concluded that development could be delivered without significant landscape effect on the assumption that vegetated buffers and public access is retained to the north of the site; heritage and archaeology as site within an ANA and is in proximity to various heritage assets (noted that no further archaeological assessment has taken place); water quality as site within GSPZ 2; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. Loss of open space could also impact upon health, although it is recognised that only approximately 18% of site area is allocated for housing. Although the site allocated is not at risk of surface water flooding, it is adjacent to an area with flood risk and could increase the risk of flooding due to change in form to one of a more urbanised nature. Site does have risk of groundwater flooding.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 25 housing units are provided, this should include 40% affordable dwellings and the site may also be suitable for family type housing. Although delivery of 25 units would only provide a site density of 21dph, this would be in character with the surrounding area and would enable greenfield/ecosystem services to be retained on the remainder of the site, such as SUDS and flood prevention measures, helping to make good use of the site and having wider environmental benefits. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for nearby employment/skills deprived communities.</p>
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**SA site assessment: Urban Fringe Site 17, Land at Ladies Mile, Patcham**

<b>Site Description</b>	Publically accessible designated open space of the natural/semi-natural and amenity greenspace typologies, a large part of which comprises the Ladies Mile Local Nature Reserve.
<b>Site Area</b>	15.02ha
<b>Current Use</b>	Open spaces used for informal recreation purposes
<b>Potential Use</b>	35 dwellings on 1.25ha of the site

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-	Part of the site comprises the Ladies Mile LNR which includes areas of semi-improved calcareous grassland. The allocated site, which forms approximately 9% of the entire site is not within the LNR. UFA 2015 states the area with development potential to consist of mainly species poor and semi-improved chalk grassland which had potential for protected and notable species.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprises publically accessible open space. Residential development on the site would result in losses in some areas of publically accessible open spaces. The allocated site mainly comprises amenity greenspace.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site is contained by development to the north, south and west, with the eastern edge adjacent to the SDNP although separated by the A27. UFA 2015 states the ridge is an evident feature but is affected by development in the western area by the A27. The dense areas of scrub on the margins separate the site from the SDNP and blocks views of the site from the SDNP. There is therefore little interconnectivity between the site and the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Ladies Mile Bronze Age Settlement ANA covers large extent of the UF site and some of the area of potential. Area assessed in UFA 2015 (Archaeology) as having very high archaeological potential and development could have a significant impact. The northern tip of the UF site is within a Scheduled Monument (Earthworks & Lynchetts Eastwick Barn) and is located c.400m from the site allocated. UFA 2015 (Archaeology) concluded that there is no visibility between this site and the area of potential due to a rise in the topography and therefore significant impacts on the setting are considered unlikely. No other heritage assets are in close proximity to the site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Very good access to a bus service (200m) offering regular services (every 10 minutes). Range of essential services nearby and within acceptable walking distance. However it is noted that the position of the site on the outskirts of the city and in close proximity to the A27 may influence travel choice.
6. To reduce air and noise pollution.	-/++	Site outside the AQMA and unlikely to generate change in average vehicle flow which would significantly impact upon air quality. Site suffers from road noise from the A27 of between 55-59 dcblls which could impact upon occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	-	Site within GSPZ 3.
8. To reduce the risk from all sources of flooding to and from development	+	Site consists of open spaces which provide greenfield functions including absorption of water. Site within flood zone 1. Very small area (<2%) of site allocated has low risk has of surface water flooding. Groundwater levels more than 5m below surface therefore risk of GW flooding is low.

9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.91% of site) will retain greenfield functions.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land available.	+	A housing density of 28dph would be achieved on the part of the site that is developed if 35 dwellings are provided. This is higher than the surrounding area (average density 17dph) but lower than the minimum targets expected through CP14 however takes into consideration the need to reduce likelihood of other adverse effects. This would enable some ecosystem services to be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 35 dwellings would contribute towards local housing need. Site should deliver 14 affordable units. As an urban fringe site, family type housing may be able to be delivered.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to sustainable transport provision with regular service. Some services within desirable walking distance including primary schools (350m) and secondary schools (1,500m), and other services within acceptable walking distance including shops (300m) and health (590m).
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to sustainable transport provision with regular service. Some services within desirable walking distance including primary schools (350m) and secondary schools (1,500m), and other services within acceptable walking distance including shops (300m) and health (590m). Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however recognised that large amount of site being retained in open space uses. Site has good air quality, but does suffer from road noise.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is within 50% most deprived SOA (crime domain) and therefore is not considered to be at risk of crime. Development on the site could increase activity which can provide passive surveillance.
18. To increase equality and social inclusion	++	Site would provide 40% affordable housing. Site is within 20% most deprived (employment domain) and 30% most deprived (education/skills domain) and could provide employment/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.

employment needs.		
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: air quality as site is located outside the AQMA; designated heritage assets; soil quality as site unlikely to be contaminated; flood risk as majority of site has no risk of flooding; economy as development would not result in any loss of employment land; access to services, health and transport, as the site has good access to most services as well as sustainable transport access. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with biodiversity as the wider site is an LNR, although it is noted that the UFA2015 concluded that measures such as improved footpaths and provision of open space with the development should mitigate against any increase in recreational pressure on the LNR, and incorporation of hedgerow/scrub buffers and enhancement of calcareous grassland should reduce the potential of significant adverse effect; loss of open space; landscape due to proximity to SDNP although it is noted that UFA 2015 concluded that development contained to the southern edge adjacent to Windmill Hill and Carden Avenue and which avoided the ridge-top would not have significant landscape effect; archaeology as the site has very high potential for archaeology and the UFA2015 concluded that a programme of archaeological evaluation would be required to evaluate the potential and inform future decisions; water quality as site within a GSPZ3; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. Loss of open space could also impact upon health, although it is recognised that only approximately 9% of site area is allocated for housing, The site also suffers from road noise which could impact upon occupier amenity.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 35 housing units are provided, this should include 40% affordable dwellings and the site may also be suitable for family type housing. Although delivery of 35 units would only provide a site density of 28dph, this would be more in character with the surrounding area and would enable greenfield/ecosystem services to be retained on the remainder of the site, helping to make good use of the site and having wider environmental benefits. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>

**SA site assessment: Sites 21 and 21a, land to the north east of Coldean Lane and north of Varley Halls, Coldean, Brighton**

<b>Site Description</b>	Sites are designated as countryside. Sites located within the area that lies between the A27 and Coldean Lane, adjacent to the Varley Halls student accommodation.
<b>Site Area</b>	9.04ha
<b>Current Use</b>	Managed grassland and undeveloped areas around halls of residence. Sites could be accessed for recreational purposes particular by students.
<b>Potential Use</b>	112 dwellings across 2.52ha (100 dwellings on site 21(1.6ha) and 12 dwellings on 21a (0.92ha)). Dwellings would be delivered as part of the Joint Venture between BHCC and Hyde New Homes to delivery affordable homes.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Both sites lie within the Stanmer Park proposed Local Nature Reserve. The LNR is designated due to the presence of calcareous grassland, although it is noted that biological records do not support this. Ancient woodland is located to the south of site 21c. UFA 2015 found semi-improved grassland habitats in parts of the sites, broadleaved woodland and scattered shrub and potential for protected or notable species.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	Although the sites are not formally designated open space, the sites do provide an open space function, e.g. through informal recreation.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site 21 is adjacent to the SDNP, however landscape qualities are compromised by urbanising influencing, such as the A27 and presence of existing housing across Coldean Lane. Coldean Woods (within SDNP) lies adjacent to the southern end of site 21c. Great Wood of Stanmer Park screens the sites from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Entire site within Varley Halls ANA. UFA 2015 (Archaeology) concluded there is high potential for archaeological deposits across the site based on previous excavations and that development would be likely to have significant impact on buried archaeological deposits. Although the sites are situated within Stanmer Park estate Historic Park & Garden, they are separated from the main focus of the estate by the A27 and the Varley Halls development. No listed buildings on site or in close proximity. Listed buildings within Stanmer Park c.600m from site, however located beyond the Great Wood and therefore not visible from the site. No Conservation Areas on site, however Stanmer Conservation Area in close proximity c. 70m from nearest point on site 21a, however situated on the other side of the A27.
5. To reduce the need to travel by car, encourage travel by sustainable	-	Some services within walking distance, including shop and health facilities. However, although there is a bus service within close proximity to the site, the service is fairly infrequent (every 20 minutes). The position of the

forms of transport and improve travel choice.		site on the outskirts of the city and in close proximity to the A27 may influence travel choice.
6. To reduce air and noise pollution.	--	Site outside the AQMA. Delivery of 112 houses will increase the average amount of vehicle movements to the area, and this could exceed the amount over which significant impacts on air quality are likely (more than 500AADT). Site suffers from road noise from the A27 of between 55-64 dcbIs which could impact upon occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from development	+	Parts of site are greenfield in nature and therefore will perform a role in water absorption. Site in flood zone 1 and has no risk of surface water flooding. Groundwater levels more than 5m therefore site has low risk of GW emergence.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.72% of site) will retain greenfield functions.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site comprises open spaces with no existing buildings on site.
13. To make the best use of land available.	+	A housing density of 62dph would be delivered on site 21 and 13dph would be delivered on site 21c. Although the density on site 21c is lower than the minimum target expected through CP14 this takes into consideration the need to reduce the likelihood of other adverse effects. Ecosystem services would be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 112 dwellings, all of which would be delivered through the Joint Venture and would therefore be affordable, would make a significant contribution to affordable housing need in the city.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to public transport, although service is fairly infrequent. Primary school within desirable walking distance (650m); health within acceptable walking distance (560m); shops and secondary schools at preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in	+	Site has good access to sustainable transport provision, although service is fairly infrequent. Some services within desirable or acceptable walking distance including primary school and health facilities, however shops

health.		and secondary schools at preferred maximum. Playground at more than preferred maximum (830m). Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however recognised that large amount (72%) of site being retained in open space uses. Site has good air quality but does suffer from road noise.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% least deprived SOA (crime domain) and therefore is not considered to be at risk of crime. Further development on the site could increase activity which can provide passive surveillance.
18. To increase equality and social inclusion	++	Site has potential to delivery 100% affordable housing. Site located within 50% most deprived SOA employment domain and 20% most deprived SOA education domain, and is adjacent to SOA within 10% most deprived (employment and education), and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: air quality as site is located outside the AQMA; designated heritage assets as although site within the Stanmer Park Historic Park &amp; Garden, the site is separated from the main estate by the A27; soil quality as site unlikely to be contaminated; flood risk as majority of site has no risk of flooding; economy as development would not result in any loss of employment land; access to services and health, as the site has reasonable access to most services. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity as the wider site is an LNR, although it is noted that the UFA2015 concluded that the minimisation of loss of broadleaved woodland and grassland habitats, enhancements to remaining habitats and retention of a buffer between development within site 21c and the area of ancient woodland should help mitigate ecological impacts; loss of open space; landscape due to proximity to SDNP although it is noted the UFA 2015 concluded that this amount of development could be delivered on this site without significant landscape effect provided that building heights did not break the wooded skyline and that access could be achieved without breaking the tree-belt along Coldean Lane; archaeology as the site has high potential for archaeology and the UFA2015 concluded that a programme of</p>

		<p>archaeological evaluation would be required to evaluate the potential and inform future decisions; water quality as site within a GSPZ2; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. The site also suffers from road noise which could impact upon occupier amenity. Public transport access is limited which could influence travel choice. Loss of open space could also impact upon health, although it is recognised that only approximately 28% of site area is allocated for housing.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing, particularly affordable housing as all housing would be delivered under the Joint Venture Scheme. The site may also be suitable for family type housing. Delivery of 112 units would enable greenfield/ecosystem services to be retained on the remainder of the site, helping to make good use of the site and having wider environmental benefits. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>
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#### SA site assessment: Site 30 Land at and adjoining Brighton Race Course

<b>Site Description</b>	Site comprises various open spaces including Brighton Race Course, Race Hill Allotments, natural/semi-natural, and amenity greenspace. Part of site comprises the Whitehawk Hill LNR and the Wilson Avenue SNCI.
<b>Site Area</b>	46.1ha (total site)
<b>Current Use</b>	Open space uses for various purposes, including recreation.
<b>Potential Use</b>	150 dwellings on 1.21ha of the site. Dwellings would be delivered as part of the Joint Venture between BHCC and Hyde New Homes to deliver affordable homes.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-	The wider site contains a LNR, designated for calcareous grassland habitats which support notable butterflies, and an SNCI. Biological records indicate presence of calcareous grasslands in the south of the wider site and presence of protected and notable species. The site allocated for housing is located within the LNR. UFA2015 found presence of amenity grassland, semi-improved neutral grassland, semi-natural broadleaved woodland and scrub present across the wider site, and the area with potential (site allocated) to be predominantly scrub



		with a small area of semi-improved neutral grassland.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	The site allocated for housing comprises designated open space of the natural/semi-natural typology, although it is recognised that only 3% of the total site area is allocated for development.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	North-eastern part of the site adjoins the SDNP although remainder is surrounded by residential development and open space uses. Whitehawk Hill is a prominent feature in views from the SDNP. Existing development within the coombe (Whitehawk) is largely screened by the higher ground of Sheepcote Valley.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Whitehawk Camp Scheduled Monument lies within the south-western corner of the UF site, c.500m from site allocated. The UFA 2015 (Archaeology) concluded that the area of potential was within the wider setting of the SM but not within the immediate setting. Whitehawk ANA covers southern half of UF site, located c. 100m to the southwest of the site allocated. The UF site as a whole was assessed in the UFA 2015 as having very high archaeological potential; with the site allocated having moderate potential for archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	Site has very good access to a bus service (150m) offering regular services (every 6 minutes) and has a local shop nearby. Some services including health and secondary schools located more than 900m from the site which may influence travel choice.
6. To reduce air and noise pollution.	--/+	Site located outside the AQMA and does not suffer from high levels of road noise. However, delivery of 150 dwellings on the site could result in an increase in daily vehicle movements and this could exceed the amount over which significant impacts on air quality are likely (more than 500AADT).
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within GSPZ 1, 2 or 3.
8. To reduce the risk from all sources of flooding to and from development	+	Site is greenfield in nature. Within flood zone 1 and the site has no risk of surface water flooding. Groundwater levels more than 5m below surface therefore low risk of GW flooding.
9. To reduce emissions of greenhouse gases that cause climate change	+?	Although the site is not within a Heat Network Opportunity Area, delivery of a significant flattened development on this site could increase the potential to provide communal heating which is more energy efficient than individual heating systems, although would depend on implementation.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site will retain some greenfield functions.

11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site is predominantly open space with few existing buildings on site.
13. To make the best use of land available.	++	Delivery of 150 dwellings on this site would achieved a dwelling density of 124dph and therefore make the4 best use of the site through a high density scheme.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 135 dwellings, all of which would be delivered through the Joint Venture and would therefore be affordable, would make a significant contribution to affordable housing need in the city.
15. To improve the range, quality and accessibility to services and facilities.	+	Primary school considered to be within desirable walking distance (900m), as is a local shop (200m) and local park (200m), however other services at or above preferred maximum including health (950m) and secondary school (5,200m).
16. To improve health and well-being, and reduce inequalities in health.	+	Primary school considered to be within desirable walking distance (900m), as is a local shop (200m) and local park 9200m), however other services at or above preferred maximum including health (950m) and secondary school (5,200m). Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being, however recognised that large amount (97%) of site being retained in open space uses. Site currently has good air quality and does not suffer from road noise.
17. To improve community safety, and reduce crime and fear of crime.	--	Site is within 10% most deprived SOA (crime domain). Opportunities to design out crime and facilitate community interaction should be maximised.
18. To increase equality and social inclusion	++	Site has potential to delivery 100% affordable housing. Site located within 20% most deprived SOA employment domain and 10% most deprived SOA education domain and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	No issues: Development of the site is unlikely to raise any issues with the following objectives: water quality as site outside the GSPZ; soil quality as site unlikely to be contaminated; access to services and health as some services within close proximity to the site; economy as development would not result in any loss of employment land; flood risk as no risk of surface water or groundwater flooding on site. Development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.

	<p>Potential adverse effects:  Development of the site could raise issues with biodiversity as the site is within a LNR and has habitats within the LBAP and protected species, although it is noted that the UFA 2015 concluded that although development would result in loss of habitats within the LNR, it would not significantly affect the reason for the designation and could be mitigated through enhancement of retained habitats within the LNR, and recreation of calcareous grassland, including increasing their robustness to recreational pressure; loss of natural/semi-natural open space although it is recognised 97% of the site will remain in open space uses; landscape due to proximity and visibility from the SDNP although it is noted that UFA2015 concluded that significant effects could be avoided by avoiding higher ground and ensuring that buildings don't break the ridge line; heritage and archaeology as the site is likely to be within the wider setting of the Schedule Monument and has moderate potential for archaeology, with it noted that the UFA 2015 concluded that the impacts on heritage assets would require detailed assessment and careful design to minimise impacts, and that a programme of archaeological evaluation would be required to inform future decisions; climate change adaptation as the as development would result in urbanisation of parts of a site with natural form; air quality, as although situated outside the AQMA, the amount of development proposed could generate an amount of vehicle movements that could have a significant impact on air quality. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing, particularly affordable housing as all housing would be delivered under the Joint Venture Scheme. The site may also be suitable for family type housing. Delivery of 150 dwellings would achieve a dwelling density of 124dph which would make good use of the site. Delivery of development in a flatted form could provide opportunities to support climate change mitigation through communal heating systems. Development could provide employment/training for employment/skills deprived communities.</p>
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**SA site assessment: Site 32 and 32a Land at South Downs Riding School and Reservoir, Bear Road, Brighton**

<b>Site Description</b>	Urban fringe site comprising a cluster of barns, stables and other buildings, adjacent to a row of terraced housing and a covered reservoir.
<b>Site Area</b>	2.18ha
<b>Current Use</b>	In use predominantly as horse paddocks.
<b>Potential Use</b>	15 dwellings on 0.57ha

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	Wider site contains the proposed Bevendean Down Local Nature Reserve, LNR designated for its rich chalk grassland. No biological records of protected or notable species present. UFA 2015 found that the site allocated is not within the LNR boundary and consists mainly of bare ground and amenity grassland with low ecological value and loss of these habitats would not result in a notable impact on local ecology and that ecological value of habitats could be enhanced through green infrastructure.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	The site does not include any designated open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Immediately adjacent to SDNP on east side of site. The site occupies a prominent position on the summit of Race Hill, however the site includes an existing cluster of buildings and tree cover and therefore development in this location is within an area where landscape qualities are already compromised.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	No designated heritage assets on or in immediate vicinity of the site. Site within the Race Hill ANA and has high archaeological potential, particularly as the site contains significant amounts of undeveloped open space.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Although the site has good access to a regular bus service, all other services and facilities are located some distance from the site, which is likely to influence travel choice.
6. To reduce air and noise pollution.	++	Site located outside the AQMA and is not subject to high levels of road noise. Development on the site unlikely to generate an amount of traffic which would significantly impact upon air quality.

7. To improve water quality (ecological, chemical and quantity status)	++	Site not within GSPZ 1, 2, or 3.
8. To reduce the risk from all sources of flooding to and from development	+	Site is greenfield in nature. Within flood zone 1 and the site has no risk of surface water flooding. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site includes some greenspace which will therefore provide some functions such as water absorption/temperature regulation and will be lost through development. However undeveloped parts of site will retain greenfield functions and development on bare ground provides the opportunity to improve climate change adaptation, e.g. through SUDS/Green infrastructure.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	-	Site does contain some buildings, however it is unlikely that these could be made use of.
13. To make the best use of land available.	+	Delivery of 15 dwellings would achieve a site density of 26dph. Although this is lower than the amount expected to be achieved through CPP1 CP14, it reflects the hilltop location and the need to minimise other potential adverse effects. Ecosystem services will be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Site should provide 15 dwellings. Family type housing could be provided. 40% affordable dwellings should be provided which would equate to 6 dwellings.
15. To improve the range, quality and accessibility to services and facilities.	-	Site does not have good access to services. Primary schools (1270m) within acceptable walking distance. Secondary schools (4520m), local shop (1200m), and health (1200m) all located more than preferred maximum walking distance. Site could result in loss of facility used for recreational purposes.
16. To improve health and well-being, and reduce inequalities in health.	-	Site does not have good access to services. Primary schools (1270m) within acceptable walking distance. Secondary schools (4520m), local shop (1200m), and health (1200m) all located more than preferred maximum walking distance. Site does not suffer from any air or noise quality issues. Site could result in loss of facility used for recreational purposes.
17. To improve community safety, and reduce crime and fear of crime.	-	Site within 20% most deprived SOA crime domain. Opportunities to design out crime and facilitate community interaction should be maximised.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site located within 30% most deprived SOA employment domain and 20% most deprived SOA education domain and could therefore offer training opportunities for

		deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site identified for housing only. Development of site would not result in any losses in land in employment uses, however it is recognised that the pony paddocks and stables is an established business that would be lost through redevelopment.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: open space as site does not include any designated open space; air/noise quality as site is located outside the AQMA, away from road noise and is unlikely to generate a significant amount of traffic; designated heritage assets as none in or close proximity to the site; water quality as site outside the GSPZ; soil quality as site unlikely to be contaminated; flood risk as majority of site has no risk of flooding.</p> <p>Potential adverse effects: Development of the site could raise issues with landscape due to proximity to SDNP and its prominent hilltop location although the UFA2015 concluded that development in this location would not result in a significant change in landscape character due to presence of existing buildings provided that the character of new development was appropriate and not suburban in nature; archaeology as the site has high potential for archaeology and the UFA2015 concluded that a programme of archaeological evaluation would be required to evaluate the potential and inform future decisions; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. Although public transport access is good, services are located some distance from the site which could impact upon transport, access and health. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime. Development of the site could result in loss of an existing established business. Development of the site unlikely to be able to make use of any existing building on site and would produce demolition waste.</p> <p>Potential positive effects: Although adjacent to an LNR, the site allocated has low ecological value and therefore development provides the opportunity to improve ecological value through green infrastructure, having wider environmental benefits. Development of the site would have positive impacts for housing, including affordable housing. The site may also be suitable for family type housing. Delivery of 15 units would enable some ecosystem services to be retained on the remainder of the site, helping to make good use of the site and having wider environmental</p>

		benefits. Development could provide employment/training for adjacent employment/skills deprived communities.
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**SA site assessment: Site 33 Land north of Warren Road, Brighton**

<b>Site Description</b>	BHCC owned urban fringe site comprising a cluster of stables with paddocks, and open space (natural/semi-natural).
<b>Site Area</b>	5.25ha
<b>Current Use</b>	Part of site used as horse stables. Approximately 50% of site is designated open space (natural/semi-natural)
<b>Potential Use</b>	30 dwellings on 1.2ha of site.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	?	Parts of site are PDL, parts of site are greenfield in nature. No ecological designations on site. Site adjacent to the Bevendean Down proposed Local Nature Reserve which could be subject to increased recreational pressure. Parts of site, including part of the site allocated contains natural/semi-natural open space and could have potential for biodiversity. No further ecological assessment carried out on the site therefore it is difficult to gauge ecological value to impacts.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprised of c.50% natural/semi-natural open space. Site allocated includes some open space of the natural/semi-natural typology.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Urban fringe site immediately adjacent to and surrounded by SDNP on the east, west and northern sides. Fairly prominent and elevated position with existing stables and associated development standing out as a development within a broadly undeveloped gap between Brighton & Woodingdean.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	No heritage assets on site or adjacent to it. No ANA on site although its ridge-top location could mean there is potential for prehistoric, Roman or early medieval remains.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve	--	Although the site has good access to a regular bus service, all other services and facilities are located some distance from the site, which is likely to influence travel choice.

travel choice.		
6. To reduce air and noise pollution.	++	Site located outside the AQMA and is not subject to high levels of road noise. Development on the site unlikely to generate an amount of traffic which would significantly impact upon air quality.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within GSPZ 1, 2, or 3.
8. To reduce the risk from all sources of flooding to and from development	+	Site is partly open space/partly developed in nature. Within flood zone 1 and the site has no risk of surface water flooding. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site includes some green open spaces which will therefore provide some functions such as water absorption/temperature regulation and will be lost through development. However undeveloped parts of site will retain greenfield functions and development on bare ground provides the opportunity to improve climate change adaptation, e.g. through SUDS/Green infrastructure.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	-	Site does contain some buildings, however it is unlikely that these could be made use of.
13. To make the best use of land available.	+	Delivery of 30 dwellings would achieve a site density of 25dph. Although this is lower than the amount expected to be achieved through CPP1 CP14, it reflects the hilltop location and the need to minimise other potential adverse effects. Ecosystem services will be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site should deliver 30 dwellings, which should include 40% affordable units (12 units). Family type housing could also be provided.
15. To improve the range, quality and accessibility to services and facilities.	-	Site does not have good access to services. Primary schools (1320m) within acceptable walking distance. Secondary schools (3800m), local shop (1100m), and health (1800m) all located at or more than preferred maximum walking distance. Site could result in loss of facility used for recreational purposes.
16. To improve health and well-being, and reduce inequalities in health.	-	Site does not have good access to services. Primary schools (1320m) within acceptable walking distance. Secondary schools (3800m), local shop (1100m), and health (1800m) all located more than preferred maximum walking distance. Site does not suffer from any air or noise quality issues. Site could result in loss of facility used for recreational purposes.
17. To improve community safety,	++	Site within 50% most deprived SOA (crime domain).



and reduce crime and fear of crime.		
18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site located within 20% most deprived SOA employment domain and 10% most deprived SOA education domain and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site identified for housing only. Development of site would not result in any losses in land in employment uses, however it is recognised that the pony paddocks and stables is an established business that would be lost through redevelopment.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: air/noise quality as site is located outside the AQMA, away from road noise and is unlikely to generate a significant amount of traffic; designated heritage assets including archaeology as none in or close proximity to the site; water quality as site outside the GSPZ; soil quality as site unlikely to be contaminated; flood risk as majority of site has no risk of flooding; community safety as site not situated in an area that suffers from high levels of crime.</p> <p>Potential adverse effects:  Development of the site could raise issues with biodiversity, as although there are no ecological designations on site, the site includes natural/semi-natural open space which could therefore have potential for biodiversity and is adjacent to a LNR which could be subject to recreational pressure; open space as the site allocated contains designated natural/semi-natural open space; landscape due to proximity to SDNP and its prominent hilltop location although the UFA2015 concluded that development in this location would not result in a significant effect due to presence of existing buildings provided that the character of new development was appropriate and not suburban in nature; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. Although public transport access is good, services are located some distance from the site which could impact upon transport, access and health. Development of the site could result in loss of an existing established business. Development of the site unlikely to be able to make use of any existing building on site and would produce demolition waste.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing, including affordable housing. The site may also be suitable for family type housing. Delivery of 30 units would enable some ecosystem services to be retained on the remainder of the site, helping to make good use of the site and having wider environmental benefits. Development could provide employment/training for adjacent employment/skills deprived communities.</p>

**SA site assessment: Site 38, 38a and 39 Land at Ovingdean Hall Farm and Bulstrode Farm, Ovingdean**

<b>Site Description</b>	Part BHCC/part privately owned land consisting of Ovingdean Hall Farm and Bulstrode Farm. Site occupied by clusters of modern farm buildings and surrounding spaces. Paddocks at the northern extent of the site.
<b>Site Area</b>	4.45
<b>Current Use</b>	Working farm.
<b>Potential Use</b>	50 dwellings across 4.17ha of site

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	Site is PDL. Site does not contain any ecological designations. Site is not immediately adjacent to any ecological designations. Development of site unlikely to have any impacts on biodiversity and could offer potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	The site does not include any designated open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Urban fringe site immediately adjacent to and surrounded by SDNP on the east, west and northern sides. Site situated within a coombe to the north of the historic core of the village of Ovingdean. UFA 2015 found that development would expand the residential area of the village but would still be located on the valley floor and would be developing land that is already occupied by buildings.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site within the Ovingdean Conservation Area. 14 listed buildings within Conservation Area, including the Grade I listed St Wulfrans Church. No listed buildings within site allocated. The Conservation Area Character Statement describes the site within Character Area 3: The Farms, as "forming the northern limit of the village and gateway to the Downs - contains groups of functional buildings which are largely of no architectural or historic merit. Some of those buildings remain in use as a farm and stables. These uses contribute greatly to the character of the area, and act as a strong reminder of Ovingdean's agricultural past. Other buildings - particularly those of the former poultry farm - are under-used or dilapidated, and detract from the area." Part of site within Ovingdean ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Although the site has fairly good access to a bus stop, the service is infrequent. In addition, most services and facilities are located some distance away from the site which may influence travel choice and use of car.
6. To reduce air and noise pollution.	+	Site located outside the AQMA and is not subject to road noise. Site use unlikely to generate an amount of

		traffic that could significantly affect air quality, but may generate traffic at certain times of the day.
7. To improve water quality (ecological, chemical and quantity status)	++	Sites not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Within flood zone 1. Approximately a quarter of the site has a risk of surface water flooding, ranging from low to high risk. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is PDL and could offer opportunities to increase green infrastructure and/or flood defences.
11. To improve soil quality	--/+	The entire site sits within Grade 3 Agricultural Land, as does the village of Ovingdean, although the site allocated is not in agricultural uses. Site could have potential for contamination from current agricultural uses which may provide opportunity for remediation.
12. To minimise and sustainably manage waste	--	PDL site however unlikely that any of the current buildings could be re-used/adapted due to their agricultural nature.
13. To make the best use of land available.	+	Delivery of 50 dwellings across 4ha of the site would provide a site density of 12dph. Although this is lower than the minimum density required by CPP1 CP14 this amount would reflect the dwellings density of the wider area and help to minimise risk of other adverse impacts.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site should deliver 50 dwellings, which should include 40% affordable units (20 units). Family type housing could also be provided.
15. To improve the range, quality and accessibility to services and facilities.	-	Site does not have good access to most services. Secondary schools (1500m) within acceptable walking distance. Local shop (450m) around preferred maximum walking distance. Primary schools (2490m) and health (1200m) located more than preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	-	Site does not have good access to most services. Secondary schools (1500m) within acceptable walking distance. Local shop (450m) around preferred maximum walking distance. Primary schools (2490m) and health (1200m) located more than preferred maximum walking distance. Site unlikely to suffer from air or noise quality impacts and will not result in loss of open space that has recreational value.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% least deprived SOA (crime domain).

18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site located within 20% least deprived SOA employment domain and 40% most deprived SOA education domain, however is adjacent to some more deprived areas and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site identified for housing only. Development of site would not result in any losses in land in employment uses, however it is recognised that the farm provides employment and income that would be lost through redevelopment.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site is PDL and does not contain and is not is adjacent to any ecological designations; open space as the site does not contain any designated open space; air/noise quality as site is located outside the AQMA and is away from road noise; water quality as site outside the GSPZ; climate change adaptation as site entirely PDL; community safety as site not situated in an area that suffers from high levels of crime.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with landscape due to proximity to SDNP although the UFA2015 concluded that removal of modern agricultural buildings and incorporation of open space could enhance landscape character in this location and significant impacts could be avoided through ensuring the character of development avoided urban expansion; heritage assets and archaeology as entire site is within a Conservation Area and part of the site is within a ANA; flood risk as parts of site have surface water flood risk; climate change mitigation as site not within a heat network opportunity area; soil quality as site is within Grade 3 agricultural land. Public transport access is poor and most services are located some distance from the site which could impact upon car ownership/mode of transport, access and health. Development of the site could result in loss of a farm-based livelihood/income. Development of the site unlikely to be able to make use of any existing building on site and would produce demolition waste. Development of site would not meet minimum density targets and as a PDL site there are no ecosystem services that could be retained on site.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing, including affordable housing. The site may also be suitable for family type housing. Site may contained some contaminated land due to agricultural uses, which may provide the opportunity for remediation. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>

**SA site assessment: Site 42 Land adjacent to Ovingdean and Falmer Road, Ovingdean**

<b>Site Description</b>	Part BHCC/part privately owned urban fringe site consisting of natural/semi-natural designated open space and school playing fields for Longhill School.
<b>Site Area</b>	7.47ha
<b>Current Use</b>	In use as school playing fields and pony paddocks.
<b>Potential Use</b>	Numbers to be confirmed for housing potential following appeal.

**Nb: information submitted by statutory consultees as part of consultations in addition to background studies taken into consideration during assessment.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	0/-	Main part of site does not contain any ecological designations, although Ovingdean Road Horse Paddocks SNCI is located across Ovingdean Road to the north and is therefore separated from the site. Biological records identify calcareous grassland habitats in the north of the site as well as presence of various protected and notable species, including those in the LBAP, and Red Star Thistle which is a species of principal importance. UFA 2015 found semi-improved calcareous grassland and other habitats with potential for protected or notable species. Ecological consultation comments for Bh2016/05530 indicated that the development could be supported provided the recommended mitigation, including translocation of Red Star Thistle, was implemented – resulting in neutral effects with mitigation and adverse without.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	Part of site allocated is designated open space, although is privately owned with restricted access. Site allocated would not result in loss of school playing fields. Although BH2016/05530 would deliver new on-site open space, there would be a net loss of open space overall.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0/-	SDNP located to the east of the site across the Falmer Road. Falmer Road as well as the housing the north and west which already introduce urban influences into the landscape. Site is largely screened in views from the SDNP by existing trees. UFA 2015 found that the site helps to form a gap between Rottingdean and the Ovingdean Road houses to the north and development in this location would contribute to loss of separation between the two. UFA 2015 also found that development in this location may result in fragmentation and loss of continuity between the downland to the east and Mount Pleasant to the west. The inspector of the dismissed appeal (2015) stated that the open form and character are significant features which contribute to the distinctiveness of the setting. Landscape consultation comments for Bh2016/05530 indicate that development could have a neutral effect with mitigation, and a minor to moderate adverse effect without.

4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	A small part of the site is within an ANA, however this is not within the site allocation. No other designated heritage assets within or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Although the site has fairly good access to a bus stop, the service is infrequent. In addition, some services and facilities are located some distance away from the site which may influence travel choice and use of car.
6. To reduce air and noise pollution.	+	Site located outside the AQMA and is not subject to road noise. Site use unlikely to generate an amount of traffic that could significantly affect air quality, but may generate traffic at certain times of the day. Air Quality consultees comments for BH2016/05530 concluded that development would not have a significant effect on the Rottingdean AQMA.
7. To improve water quality (ecological, chemical and quantity status)	-	All of site within GSPZ 3 and part of site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from development	-	Within Flood zone 1. Some historic surface water flooding incidents adjacent to site. Entire western edge of site has high risk of surface water flooding. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site includes green open spaces which will therefore provide some functions such as water absorption/temperature regulation and will be lost through development. However undeveloped parts of site will retain greenfield functions
11. To improve soil quality	--/0	Entire site situated within grade 3 agricultural land. Site unlikely to have potential for contamination.
12. To minimise and sustainably manage waste	0	Urban fringe site with no buildings that could be adapted/re-used.
13. To make the best use of land available.	TBC	TBC following outcome of appeal
14. To provide housing, including affordable housing, to contribute	TBC	TBC following outcome of appeal

towards meeting local needs.		
15. To improve the range, quality and accessibility to services and facilities.	-	Access to services is mixed. Public transport access is poor. Secondary schools (450m) within desirable walking distance. Primary schools (1500m) within acceptable walking distance. Local shop (500m) and health (1200m) both located within preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	-	Access to services is mixed. Public transport access is poor. Secondary schools (450m) within desirable walking distance. Primary schools (1500m) within acceptable walking distance. Local shop (500m) and health (1200m) both located within preferred maximum walking distance. Site does not suffer from any air or noise quality issues. Site could result in loss of facility used for recreational purposes.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% least deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site located within 20% least deprived SOA employment domain and 40% most deprived SOA education domain, however is adjacent to some more deprived areas and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only and would not result in loss of land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: heritage as there are no designated heritage assets on or near the site allocated; archaeology as the site allocated does not contain an ANA; air and noise quality as site is located outside the AQMA and is not subject to high levels of road noise; economy as development would not result in any loss of employment land; development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site; community safety as site is not situated within an area that suffers from high levels of crime.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity as the site contains habitats and species within LBAP including protected species, although it is noted that the UFA2015 concluded that mitigation including enhancement of SNCI habitats to the north to increase robustness to recreational pressure, retention and enhancement of grassland habitats within the wider site, and retention of notable species including red star thistle and hornet robberfly should reduce adverse ecological effects; loss of designated open space; landscape due to proximity to SDNP although it is noted that the UFA 2015 concluded that new landscaping such as</p>

		<p>screening would help to limit views of any future development although may reduce the openness of views; water quality as site within GSPZ 2 and 3; flood risk as parts of site have a risk of surface water flooding; soil quality as site is within Grade 3 agricultural land; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. In addition public transport access is limited which could influence travel choice and some services are located some distance from the site which could affect transport, access and health. Loss of open space could also impact upon health, although it is recognised that only approximately 25% of site area is allocated for housing, and the open spaces within the SDNP can be easily accessed from the vicinity for recreational purposes.</p> <p>Potential positive effects: Some of the potential positive effects cannot be confirmed until the outcome of the appeal is known. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>
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**SA site assessment: Site 46A Land at former nursery site, west of Saltdean Vale, Saltdean**

<b>Site Description</b>	A privately owned urban fringe site, previously used as a nursery and comprised of green houses, grassland areas and scrub.
<b>Site Area</b>	0.96ha
<b>Current Use</b>	Currently used for caravan storage
<b>Potential Use</b>	18 dwellings on 0.96ha of site

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site consisting party of managed grassed areas and dense scrub, which UFA 2015 found to be of relatively low ecological value. No be no records of protected or notable species on the site although habitats on site could provide potential for such species. Site is adjacent to Looes Barn Woodland SNCI which could be impacted through increased recreational pressure. UFA 2015 found that ecological value of site could be enhanced through green infrastructure.



2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Site does not contain any designated open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	+	Site is adjacent to SDNP on its eastern side, but separated to the north and west by the football grounds. Landscape qualities are compromised by urbanising influences, such as the derelict greenhouses, caravans and football grounds which tie the site to the urban edge. Redevelopment could provide opportunity to improve appearance of the site.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	No designation heritage assets on or adjacent to the site. Site not within an ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Although the site has fairly good access to a bus stop, it only provides 4 services/hour. In addition, most services/facilities are located some distance away from the site which may influence travel choice and use of car.
6. To reduce air and noise pollution.	++	Site located outside the AQMA and is not subject to road noise. Site unlikely to generate significant numbers of traffic that would impact upon air quality.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	-	PDL site which comprises grassed areas as well as areas of bare ground. Parts of site have a high risk of surface water flooding. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is PDL however consists of grassed areas which should provide some ecosystem services, such as water absorption. Development of the entire site may mean that these functions cannot be retained.
11. To improve soil quality	--/0	Entire site situated within grade 3 agricultural land. Site unlikely to have potential for contamination.
12. To minimise and sustainably manage waste	0	Urban fringe site with no buildings that could be adapted/re-used.

13. To make the best use of land available.	+	Site is PDL. Delivery of 18 dwellings on the entire site would achieve a site density of 19dph. This is lower than that required by CPP1 CP14, however reflects the surrounding area and the need to minimise other potential impacts.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site will provide 18 dwellings, of which 40% (7) would be affordable. Site could provide family housing.
15. To improve the range, quality and accessibility to services and facilities.	--	Site does not have good access to most services. Primary school (1100m) within acceptable walking distance. Local shop (1100m), secondary schools (43200m) and health (1300m) all located more than preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	-	Site does not have good access to most services. Primary school (1100m) within acceptable walking distance. Local shop (1100m), secondary schools (43200m) and health (1300m) all located more than preferred maximum walking distance. Site unlikely to suffer from air or noise quality impacts and will not result in loss of open space that has recreational value.
17. To improve community safety, and reduce crime and fear of crime.	++	Site within 20% least deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site located within 20% least deprived SOA employment domain and 40% most deprived SOA education domain, however is adjacent to some more deprived areas and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain any ecological designations; open space as the site does not contain any designated open space; landscape due to existing urban influences and location of site; heritage assets as site does not contain any designated heritage assets or archaeology; air/noise quality as site is located outside the AQMA and is away from road noise; economy as development would not result in any loss of employment land; development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site; community safety as site not situated in an area that suffers from high levels of crime.</p> <p>Potential adverse effects: Development of the site could raise issues with water quality as site within GSPZ 1; flood risk as parts of site</p>

	<p>have surface flood risk; climate change mitigation as site not within a heat network opportunity area; climate change adaptation as parts of site includes grassed areas which could provide some ecosystem services which are unlikely to be retained; soil quality as site is within Grade 3 agricultural land; public transport access is infrequent and most services are located some distance from the site which could impact upon car ownership/mode of transport, access and health. Development of site would not meet minimum density targets and as a PDL site which is allocated for development in its entirety there are no ecosystem services that could be retained on site.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing, including affordable housing. The site may also be suitable for family type housing. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The area does not suffer from high levels of crime, however development of the site could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>
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**SA site assessment: Sites 48-48c Cluster at Coombe Farm and Saltdean Kennels, Westfield Avenue North, Saltdean**

<b>Site Description</b>	A cluster of privately owned sites comprised of small wooded area, grassland areas, two dwellings with gardens, former farm buildings used as a stables and for storage, areas of hard-standing, former slurry pit, two paddocks and a boarding kennels.
<b>Site Area</b>	5.65ha
<b>Current Use</b>	Residential properties occupied. Dairy farm buildings are largely redundant, with some used for vehicle repairs, caravan storage and construction storage. Dog kennels in active use.
<b>Potential Use</b>	65 dwellings across 3.47ha. Approved outline application (BH2016/01903) for sites 48, 48a and 48b to deliver 60 dwellings with creation of public open space and retention of wooded area.

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site. There are no ecological designations on the site. There are some biological records of notable and protected species on the site. The south-eastern edge of the site is adjacent to Coombe Farm SNCI. The UFA 2015 found the site consisted of a range of common or widespread habitat types and that the area with development potential had low ecological value, although on a local level the mix of habitats could have some

		<p>value for wildlife. UFA 2015 concluded that development would provide the opportunity to enhance biodiversity.</p> <p>Approved application retains area of woodland in site 48. Ecological consultation comments recommends retention of natural habitats where possible, buffer zone between the development and SNCI, and recommended measures to ensure protection of notable/protected species.</p>
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	The site does not contain any designated open space. Outline planning permission includes provision of >2,000m2 of public open space and play area which would increase provision in this area.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	+	<p>SDNP surrounds the site to the north, west and east. Site situated within a steep-sided but fairly flat-bottomed coombe. Although site adjacent to SDNP, landscape qualities already compromised by urban influences, particularly of the cluster of farm buildings, and some redevelopment of site could improve appearance. Landscape sensitivity analysis carried out in UFA 2015 found that although the site forms part of the SDNP setting it is seen in the context of existing adjacent development. UFA 2015 suggested that the replacement of farm buildings with residential development would have little impact on settlement form. UFA 2015 concluded that development located on the coombe-side sites, and not located on higher ground than existing houses, would be unlikely to have significant landscape effects.</p> <p>Landscape consultation comments supported the principle of well-designed and adequately mitigated housing on this site and that it could conserve and enhance the character of the area. Landscape comments on a version of the scheme which proposed 67 units were considered to be over-development of the site.</p>
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to any designated heritage assets. Site not within an ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Although the site has fairly good access to a bus stop, it only provides 4 services/hour. In addition, most services/facilities are located some distance away from the site which may influence travel choice and use of car.
6. To reduce air and noise pollution.	++	Site located outside the AQMA and is not subject to road noise. Site unlikely to generate significant numbers of traffic that would impact upon air quality in this location. Air Quality assessment measured the impact of development on the Rottingdean AQMA to be negligible.
7. To improve water quality (ecological, chemical and quantity)	-	All of site with GSPZ 3

status)		
8. To reduce the risk from all sources of flooding to and from development	-	In flood risk zone 1. High risk of surface water flooding on northern part of site. Medium to low risk on eastern edge of site. Remainder of site very low risk. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is mainly PDL and offers some opportunity to retain and increase green infrastructure.
11. To improve soil quality	+	Site could be contaminated based on former uses and offers potential for remediation.
12. To minimise and sustainably manage waste	--	No potential to make any use of existing buildings on site, e.g. through adaptive re-use.
13. To make the best use of land available.	+	65 dwellings across the site will provide a site density of 19dph. Although this is lower than the CPP1 minimum density targets, this will allow public open space to be delivered, as well as potential for some other ecosystem services. It also reflects the character of the wider area.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site should deliver 65 dwellings, which should include 40% affordable units (26 units). Family type housing could also be provided.
15. To improve the range, quality and accessibility to services and facilities.	--	Site does not have good access to most services. Primary school (1400m) within acceptable walking distance. Local shop (1,100m), secondary schools (4700m) and health (1400m) all located more than preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	-	Site does not have good access to most services. Primary school (1400m) within acceptable walking distance. Local shop (1,100m), secondary schools (4700m) and health (1400m) all located more than preferred maximum walking distance. Site unlikely to suffer from air or noise quality impacts and will not result in loss of open space that has recreational value.
17. To improve community safety, and reduce crime and fear of crime.	++	Site within 20% least deprived SOA (crime domain). Delivery of open space on site will provide opportunity for community interaction.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. 5% of all housing to be wheelchair accessible in accordance with planning approval. Site located within 20% least deprived SOA employment domain and 40% most deprived SOA education domain, however is adjacent to some more deprived areas and could therefore offer training opportunities for deprived communities.
19. To contribute towards the	-	Site identified for housing only. Site no longer in active farming use. Recognised that development of site will

<p>growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.</p>		<p>result in losses in some employment opportunities/businesses, e.g. dog kennels and storage.</p>
<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</p>	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site is PDL and does not contain any ecological designations; open space as the site does not contain any designated open space; landscape due to existing urban influences, location of site and opportunity to improve appearance of site through development; heritage assets as site does not contain any designated heritage assets or archaeology; air/noise quality as site is located outside the AQMA and is away from road noise; climate change adaptation as development of parts of site enable retention of some habitats providing ecosystem services; development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none on site; community safety as site not situated in an area that suffers from high levels of crime.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with water quality as site within GSPZ 3; flood risk as parts of site have surface flood risk; climate change mitigation as site not within a heat network opportunity area; public transport access is infrequent and most services are located some distance from the site which could impact upon car ownership/mode of transport, access and health. Development of the site for housing only would result in loss of some established businesses.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing, including affordable housing. The site may also be suitable for family type housing. Development in accordance with the planning consent would increase provision of public open space. Although the site would not meet minimum density targets, development of only parts of the site enable retention of some habitats and green infrastructure, as well as creation of open space, which would support climate change adaptation and provide opportunities for nature conservation enhancement. The area does not suffer from high levels of crime, however development of the site, including a public open space, could increase activity, provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities. The UFA 2015 found that ecological value of site could be further enhanced through retention of certain habitats, green infrastructure and that measures to increase the robustness of the SNCI should be implemented. The site may have potential for contamination and therefore could result in remediation of contaminated land and improve soil quality.</p>

**SA site assessment: Site 50 Land west of Falmer Avenue, Saltdean**

<b>Site Description</b>	A privately owned site consisting of managed grassland. Site does not have an open space designation.
<b>Site Area</b>	1.3ha
<b>Current Use</b>	Managed grasslands for horse grazing and small stable block.
<b>Potential Use</b>	32 dwellings on 1.07ha of the site

**Nb: approved planning application taken into consideration with scoring**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	Site does not have any ecological designations, nor is adjacent to any designated sites. Site consists of managed grassland, used for horse grazing and is considered to be of low ecological value. Site has potential for nature conservation enhancement. Approved scheme includes creation of grass meadows and tree planting.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	Site is privately owned greenspace. Site does not contain any designated open space and therefore will not result in losses in designated open space. Approved scheme includes creation of new public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	+	Site is immediately adjacent to SDNP on north and west sides. Site located at the base of a ridge which is visible as open downland when viewed from Saltdean. Site is in an elevated position on a southern spur of High Hill and therefore has some landscape sensitivity. UFA 2015 concluded that housing could be delivered across the potential development area without significant landscape effects provided that screening is provided. Appeal decision (based on larger are being developed) concluded that development of 32 dwellings would not harm the setting of the SDNP. Noted that development also includes new footpaths to link to the SDNP, which would help improve access to the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	The site does not contain nor is adjacent to any designated heritage assets. The site within the High Hill ANA and therefore could have potential for archaeology and any development should be subject to a programme of archaeological works.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-	Although the site has fairly good access to a bus stop, it only provides 4 services/hour. In addition, some services/facilities are located some distance away from the site which may influence travel choice and use of car.

6. To reduce air and noise pollution.	++	Site located outside the AQMA and is not subject to road noise. Site unlikely to generate significant numbers of traffic that would impact upon air quality in this location. Air Quality assessment measured the impact of development on the Rottingdean AQMA to be negligible.
7. To improve water quality (ecological, chemical and quantity status)	-	All of site with GSPZ 3
8. To reduce the risk from all sources of flooding to and from development	+	In flood zone 1. No risk of surface water flooding on site. Groundwater levels more than 5m below surface therefore low risk of GW flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within a heat network opportunity area. Approved scheme includes some LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is greenfield in nature and therefore provides greenfield functions. Approved scheme includes retention of some areas of open spaces which would provide some ecosystem services, however development will still result in urbanisation of 78% of the site.
11. To improve soil quality	0	Site unlikely to be contaminated.
12. To minimise and sustainably manage waste	-	Development of site in accordance with approved scheme will involve demolition of one dwelling to provide access to the site.
13. To make the best use of land available.	+	32 dwellings on a 1.07ha site provides site density of 30dph. Although this is lower than the CPP1 minimum density targets, this will allow public open space to be delivered, as well as potential for some other ecosystem services. It also reflects the character of the wider area.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site should deliver 32 dwellings. Approved scheme includes 13 affordable dwellings (=40%). Family type housing will also be provided.
15. To improve the range, quality and accessibility to services and facilities.	-	Site does not have good access to most services. Primary school (500m) within desirable walking distance. Local shop (500m), secondary schools (3400m) and health (1200m) all located at preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	-	Site does not have good access to most services. Primary school (500m) within desirable walking distance. Local shop (500m), secondary schools (3400m) and health (1200m) all located at preferred maximum walking distance. Site unlikely to suffer from air or noise quality impacts and will not result in loss of publically accessible open space.
17. To improve community safety, and reduce crime and fear of crime.	++	Site within 50% most deprived SOA (crime domain). Delivery of open space on site will provide opportunity for community interaction.



18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. 2 dwellings will be wheelchair accessible in accordance with planning approval. Site located within 30% least deprived SOA employment domain and 2% most deprived SOA education domain, however is adjacent to some more deprived areas and could therefore offer training opportunities for deprived communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site is of low ecological value and does not contain any ecological designations; open space as the site does not contain any designated open space; landscape due to design/buffers which should provide screening; air/noise quality as site is located outside the AQMA and is away from road noise; Flood risk as no risk of flood risk on site; soil quality as site unlikely to be contaminated; community safety as site not situated in an area that suffers from high levels of crime; employment, as will not result in any losses of employment land/business.</p> <p>Potential adverse effects:  Development of the site could raise issues with archaeology as entire site within an ANA; water quality as site within GSPZ 3; climate change adaptation as although development will retain some habitats providing ecosystem services, 78% of site will become urbanised; public transport access is infrequent and most services are located some distance from the site which could impact upon car ownership/mode of transport, access and health; will result in demolition of an existing building in order to gain access, therefore producing waste and not enabling any adaptive re-use.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing, including affordable housing. The site will provide family type housing and will wheelchair accessible units. Development in accordance with the planning consent would increase provision of public open space. Development will improve access to the SDNP. Although the site would not meet minimum density targets, development of only parts of the site enable retention of some habitats and green infrastructure, as well as creation of open space, which would support climate change adaptation and provide opportunities for nature conservation enhancement. Approved scheme incorporates some LZC technologies which will help support climate change mitigation. The area does not suffer from high levels of crime, however development of the site, including a public open space, could increase activity, provide passive surveillance and support community safety. Development could provide employment/training for adjacent employment/skills deprived communities.</p>

### H3 Purpose Built Student Accommodation Allocations

SA site assessment: Lewes Road Bus Garage, 107 Lewes Road, Brighton, BN2 4AE

<b>Site Description</b>	The site currently forms the Brighton & Hove Bus Company Bus Garage, comprised of a 2 storey building fronting Lewes Road, bus garages and area of hard-surfacing to the rear.
<b>Site Area</b>	1.01ha
<b>Current Use</b>	Bus Garage
<b>Potential Use</b>	Purpose Built Student Accommodation – providing 250 bedspaces, either on redundant land on the site, or above a reconstructed depot shed.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to, or within the setting of any designated heritage assets and has no potential for archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and good access to train station. Shops and health facilities all within less than 100m and within walking distance.
6. To reduce air and noise pollution.	--	Site located entirely within AQMA. Any traffic travelling to the site would need travel through the AQMA. However, development of site for PBSA is unlikely to generate change in vehicle flow which would significantly

		<p>impact upon air quality in this location.</p> <p>Site subject to road noise levels exceeding 55dcb. Proposed use of site is for PBSA which could result in noise amenity impacts for adjacent residents although it is recognised the site is in a predominantly mixed use area.</p>
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site located within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	--	PDL site. Large part of site has a high risk of surface water flooding. Site could be at risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site located in fairly close proximity to Brighton University Heat Network Opportunity Area although may not be able to connect. Development of PBSA provides good opportunity to incorporate communal heating.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, for further increase urbanisation of the city.
11. To improve soil quality	+?	Site may have potential for contamination based on current use, and may therefore provide opportunity for remediation.
12. To minimise and sustainably manage waste	--	No potential to make use of existing resources on site through redevelopment.
13. To make the best use of land available.	+	Although redevelopment is unlikely to facilitate adaptive re-use of existing buildings, a development over a reconstructed depot would help to make good use of existing land resources as would not involve any new land-take.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could provide 250 student bedspaces and would significantly contribute towards meeting the need for purpose built student accommodation.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. Services within desirable walking distance including shops (c.100m), health (c.50m) and open space (c50m). Access to schools would not be a consideration for this type of development. Site also has good access to public transport.
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to services. Services within desirable walking distance including shops (c.100m), health (c.50m) and open space (c50m). Access to schools would not be a consideration for this type of development. Site also has good access to public transport. Site will not result in loss of open space. Site is located within AQMA and has noise issues which would need careful design.
17. To improve community safety,	++	Site can be safely and easily accessed. Site located within 50% least deprived SOA (crime domain).

and reduce crime and fear of crime.		
18. To increase equality and social inclusion	++	Site has potential to deliver affordable housing. Site situated within 50% most deprived SOA education domain and 30% least deprived employment domain, but is adjacent to some deprived communities and could therefore offer opportunities to provide training-based skills.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for PBSA and redevelopment would not result in any losses of employment land.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as the site does not contain nor is in proximity to any heritage assets; transport due to proximity to sustainable transport and services; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to proximity to services; community safety as site not within an area of high crime deprivation, and economy as development would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site could raise issues with air quality, as the site is within the AQMA and can only be accessed via the AQMA, however it is recognised that PBSA in this location is unlikely to generate an increase in average daily vehicles which would affect air quality. The site is subject to high levels of road noise which could impact upon occupier amenity, and may also generate levels of noise which could impact on adjacent residential neighbourhoods. The site is within a GSPZ1 and construction could pose a risk to water quality. The site has a high risk of surface water flooding. In addition, development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>Potential positive impacts: Development of the site for PBSA would have positive impacts for housing both through the provision of student accommodation but also through relieving pressure on the existing housing market. Development of the site, particularly if above a reconstructed bus depot would have positive impacts for making the best use of land as would not involve any additional land take. Development of the site may provide opportunities for nature conservation enhancement. Although not within a Heat Network Cluster Area, PBSA provides the</p>

		opportunity to use energy more efficiently e.g. through communal heating schemes, supporting climate change mitigation. Redevelopment of the site could result in remediation of contaminated land, although this is fairly uncertain. Development could provide training/employment opportunities for adjacent communities suffering from education/employment deprivation.
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**SA site assessment: 118-132 London Road, Brighton, BN1 4JH**

<b>Site Description</b>	The site currently comprise two retail units occupied by Boots and the Coop, within a two storey building within the London Road Town Centre.
<b>Site Area</b>	0.25ha
<b>Current Use</b>	Retail A1
<b>Potential Use</b>	Purpose Built Student Accommodation – 150 bedspaces with retail below.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Site is adjacent to Valley Gardens Conservation Area and potentially within the setting of St Bartholomew's listed church which is a particularly prominent feature within the area due to its size.
5. To reduce the need to travel by car, encourage travel by sustainable	++	Very good access to regular bus services and train station. Shops, health facilities and opportunities for recreation all less than 100m and within walking distance.

forms of transport and improve travel choice.		
6. To reduce air and noise pollution.	--	Site within AQMA. Site also suffers from high levels of road noise. PBSA may not increase vehicle movements within the area if student car ownership is restricted.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL. Entire site has a low risk of surface water flooding and is adjacent to an area with a high risk of flooding. Site could be at risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within a Development Area and also within a heat network cluster area. Future development therefore offers good potential to connect to existing/future heat network.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site unlikely to have any potential for contamination, based on current retail uses.
12. To minimise and sustainably manage waste	-	There may be potential to make use of some existing resources (building) on site however development likely to result in use of natural resources.
13. To make the best use of land available.	+	Although redevelopment is unlikely to facilitate adaptive re-use of existing buildings, a PBSA over some retail units would help to make good use of existing land resources as would not involve any new land-take.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could provide 150 student bedspaces and would significantly contribute towards meeting the need for purpose built student accommodation.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. Services within desirable walking distance including shops (c.0m), health (c.50m) and open space (c100m). Access to schools would not be a consideration for this type of development. Site also has good access to public transport.
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to services. Services within desirable walking distance including shops (c.0m), health (c.50m) and open space (c100m). Access to schools would not be a consideration for this type of development. Site also has good access to public transport.
17. To improve community safety, and reduce crime and fear of crime.	-	Site located within SOA that is within 10% most deprived crime domain. Opportunities to design out crime should be maximised.
18. To increase equality and social	++	Site has potential to deliver housing for particular community (students). Site situated within 20% most

inclusion		deprived SOA (education and employment domain) and could therefore offer opportunities to provide training-based skills.
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	0	Site identified for PBSA and redevelopment would not result in any losses of employment land nor employment generating uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; transport due to proximity to sustainable transport and services; groundwater quality as site not within a GSPZ; soil quality as site unlikely to be contaminated; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to proximity to services; and economy as development would not result in loss of employment land.</p> <p>Potential adverse effects:  Development of the site could raise issues with air quality, as the site is within the AQMA, however it is recognised that PBSA in this location is unlikely to generate an increase in average daily vehicles which would affect air quality. The site is subject to high levels of road noise which could impact upon occupier amenity, and may also generate levels of noise which could impact on adjacent residential neighbourhoods. The site has a low risk of surface water flooding, although is adjacent to an area of high flood risk. Site is adjacent to heritage assets including a Conservation and Listed Building. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Site is within an area with high levels of crime deprivation.</p> <p>Potential positive impacts:  Development of the site for PBSA would have positive impacts for housing both through the provision of student accommodation but also through relieving pressure on the existing housing market. Development of the site, particularly if above reconstructed retail units would have positive impacts for making the best use of land as would not involve any additional land take and would retain retail uses at ground floor level.</p> <p>Development of the site may provide opportunities for nature conservation enhancement. The site is within a Heat Network Cluster Area, and PBSA provides the opportunity to use energy more efficiently e.g. through communal heating schemes, supporting climate change mitigation.</p>

## E1 Opportunity Site for new business and warehouse uses

### SA site assessment: Hangleton Bottom, Hangleton Link Road, North Portslade

<b>Site Description</b>	Site adjacent to the A27 comprising non-designated open space, small area of natural/semi-natural open space and area of hard-standing. Site is a waste site allocation in the Waste & Minerals Site Plan.
<b>Site Area</b>	3.37ha
<b>Current Use</b>	Largely un-used. Part of site used for horse-grazing.
<b>Potential Use</b>	Waste site allocation. Potential for some B1, B2 or B8 uses only where these would not prejudice the waste site allocation.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site does not contain nor is adjacent to any sites of nature conservation interest. Site comprises non-designated and some designated open space with some trees and shrub borders. Site may therefore have some potential for biodiversity interest.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Development of the site will result in loss of non-designated and some designated open space. Development unlikely to result in improvements to or increases in designated open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site is adjacent to and within the setting of the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within, adjacent to or within the setting of any designated heritage assets nor is it within a ANA.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	--	Site has reasonable access to regular bus service however is located so that the car is likely to be the preferred mode of transport. All local services situated more than 1,600m from site.
6. To reduce air and noise pollution.	-/+	Site not within AQMA. Unknown whether development of site for employment uses would generate a change in average vehicle flow which would significantly impact upon air quality in this location.



		However, site adjacent to A27 and subject to road noise exceeding 60 dcbIs which could impact on occupier amenity although this may not be so much of an issue with employment uses.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1,2, or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is greenfield in nature. None of site has any risk of surface water flooding. Site could have risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within heat network opportunity area, however its location, and potential delivery of employment uses, may provide the opportunity to incorporate some LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is greenfield in nature. Development of site would result in losses in green infrastructure/land that provides ecosystem services which otherwise contribute towards climate change adaptation, although may retain some on site.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site has no existing structures and is predominantly greenfield in nature with no structures that could be re-used.
13. To make the best use of land available.	+	Site has been vacant/un-developed for a long period of time, despite being a waste allocation. Delivery of some business uses on site, provided that the waste allocation is not prejudiced, would help to make better use of the site. Development of the site may also provide the opportunity to retain some ecosystem services.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	0	Site allocated for employment uses.
15. To improve the range, quality and accessibility to services and facilities.	-	Development of site for employment uses would not increase provision of various services, nor would it improve access to other services, however access to schools, health and shops is less of a consideration for an employment site. The site has reasonable access by bus however there is no footpath linking the site to the bus stop and would involve walking alongside a busy roadway.
16. To improve health and well-being, and reduce inequalities in health.	-	See above re: access. In addition, development of site could result in loss in non-designated open spaces/designated open spaces which could be used for informal recreation, although it is recognised that the site is adjacent to the SDNP which also offers opportunities for recreation.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is situated within 50% least deprived SOA (crime domain). Development of site would increase uses on the site and could help increase passive surveillance in the area.
18. To increase equality and social	++	Site is within 30% most deprived SOA (employment domain) and 20% most deprived SOA (education domain).

inclusion		Therefore delivery of employment uses in this area could provide employment/training opportunities that could increase local skills/employment.
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. Site has excellent access to SRN which may support business in this location.
<b>Overall Summary and Policy Considerations</b>	mixed	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: designated heritage assets as none on or near site; air quality as site located outside the AQMA; water quality as site located outside a GSPZ; soil quality as site unlikely to be contaminated. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity (due to greenfield nature of site), loss of open space, landscape due to proximity to SDNP, and climate change adaptation as would result in urbanisation of a predominantly greenfield site. In addition, road noise is an issue on the site. All services are located some distance from the site, although this is unlikely to be an issue for an employment allocation, however accessing the site by public transport could be difficult and unsafe, and access by car is likely to be the preferred mode of travel. Site could be at risk of groundwater flooding. Loss of open space could also impact upon health, if the site is used for informal recreation, although it is recognised the site is adjacent to the SDNP which also provides opportunities for recreation.</p> <p>Potential positive effects: Development of the site for employment uses would have positive impacts for the local economy as would increase land supply in employment uses. Development of an un-developed site would help to make better use of the site and may help support community safety in this location by providing active uses and passive surveillance. The site is within a SOA with fairly high levels of employment and skills deprivation; employment development could therefore provide opportunities to increase skills and access to employment. Development of the site for employment uses in a location away from residential areas could provide opportunities to incorporate low/carbon technologies thus supporting climate change mitigation.</p>

## Rejected Housing Sites (post review)

SA site assessment: Kings School site, High Street, Portslade, BN41 2LG

(NB: SITE NOT ALLOCATED POST REVIEW)

<b>Site Description</b>	A brownfield council owned site currently occupied by the Kings Secondary School and comprised of education buildings and open space of the school grounds and sports pitches typologies.
<b>Site Area</b>	0.84ha (approximately 0.2ha of site is buildings and 0.64ha of site is open space).
<b>Current Use</b>	In educational uses. Likely to become vacant from September 2019 as school moves to new site.
<b>Potential Use</b>	Potential for 20 dwellings.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site with no nature conservation designations. However site may have some potential for ecological interest due to tree cover around the boundaries of the site.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	Approximately 75% of the site is designated open space of the school grounds and sports pitches typologies. Development of the site would result in loss of this type of open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Part of site within Portslade ANA. No heritage designations on site. Portslade Conservation Area c.110m with various listed buildings, however site is unlikely to be within the setting due to the presence of existing development.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-	Site has a bus stop in fairly close proximity however this only provide an infrequent service; every 20 minutes. Some services within walking distance to site.
6. To reduce air and noise pollution.	++	Site not within AQMA and does not suffer from road noise.
7. To improve water quality	++	Site not within zones 1, 2 or 3 of a GSPZ.

(ecological, chemical and quantity status)		
8. To reduce the risk from all sources of flooding to and from development	-	Site contains a mixture of land of an urbanised form and some green open space. Unknown whether any of the site would be comprised of land in a natural form and therefore development could increase the amount of urbanised land. Very small part of site has low-medium risk of surface water flooding.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is PDL however does include some green open space that will provide ecosystem services such as water absorption and temperature regulation. Development of site could therefore impact upon ability to adapt to climate change.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	--	It is presumed redevelopment of site to provide 20 dwellings would involve demolition of existing buildings. This would therefore produce waste and would not save resources.
13. To make the best use of land available.	+	Site is currently in use however will become vacant in September 2019. Deliver of 20 units would equate to a density of 23dph. Although this is less than the minimum CPP1 densities, this would reflect the density of the wider area.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could deliver 20 units, which would provide 8 affordable units.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to public transport although service is not frequent. Some services within desirable walking distance including primary school (545m), secondary schools (1350m) and playground. Health services (1,100m) and convenience store (460m) both located at preferred maximum.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport although service is not frequent. Some services within desirable walking distance including primary school (545m), secondary schools (1350m) and playground. Health services (1,100m) and convenience store (460m) both located at preferred maximum. Development of site would not result in loss of publically accessible open space. Site has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site located within 40% least deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site could provide 40% affordable dwellings. Site situated within 50% most deprived SOA (employment domain) and 40% most deprived (education domain). Site adjacent to areas with higher deprivation and development could provide employment and training opportunities for adjacent deprived communities.
19. To contribute towards the	0	Site has potential for housing only and will not result in loss of land in employment uses. Site in education uses,

<p>growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.</p>		<p>however school will be re-provided on a new site which is currently under construction.</p>
<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</p>	<p>No issues:  Development of the site is unlikely to raise any issues with the following objectives: biodiversity as site does not contain any nature conservation designations although it is recognised that some tree cover on site provide some ecological interest ; SDNP due to location within urban area; designated heritage assets as does not contain any assets; air quality as not within a AQMA; noise quality as site does not suffer from high levels of road noise; groundwater quality as not within a GSPZ; soil quality as site unlikely to be contaminated; community safety as site not within an area that has high crime deprivation; access and health due to proximity to some services; economic development as would not result in loss of employment land.</p> <p>Potential adverse effects:  Redevelopment of site would involve loss of designated open space of the school grounds and sports pitches typology. Loss of open space on the site would increase the amount of urbanised land on site, which can impact upon climate change adaptation, particularly as a small area of the site has a low to medium risk of surface water flood risk. The site is within an ANA and could impact upon archaeology. Redevelopment of the site is likely to involve demolition of existing buildings on sites and therefore development will produce waste and won't conserve natural resources. The site does not have good access to regular public transport and its location could influence car ownership and mode of travel. The site is not within a heat network opportunity area.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing and would provide 20 dwellings which could include some affordable dwellings. Although this would only provide a site density of 23dph this would reflect the character of the wider area and potentially enable some green infrastructure to be retained on site. Redevelopment could incorporate opportunities for nature conservation enhancement. Development of the site may also provide employment/training opportunities for nearby employment and education deprived communities.</p>

**SA site assessment: Land to the rear of 62-68 Beaconsfield Road and Springfield Road, Brighton**

**(NB: SITE NOT ALLOCATED POST REVIEW)**

<b>Site Description</b>	An extensive area of open space forming the railways siding/embankment, situated to the rear of a residential street and adjacent to the railway.
<b>Site Area</b>	0.66ha
<b>Current Use</b>	Designated natural/semi-natural open space – in use as railway embankment
<b>Potential Use</b>	Site has potential for 25 dwellings. Part of site has an approved planning consent (approved on appeal).

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	The site does not contain any nature conservation designations, however a TPO covers the entire site, and the site has potential for ecological value as a natural/semi-natural open space.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Entire site is designated open space of the natural/semi-natural typology. Site has no public access. Over-riding deficiency in open space within the ward including this typology
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Adjacent to Grade II* London Road Railway Viaduct. Situated within Preston Park Conservation Area. In close proximity to Preston Park Villa ANA (c.50m)
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops, health facilities and opportunities for recreation all less than 400m and within walking distance. Schools also located nearby.
6. To reduce air and noise pollution.	-	Adjacent to AQMA. Site suffers from railway noise.
7. To improve water quality (ecological, chemical and quantity)	-	Part of site within GSPZ 2.

status)		
8. To reduce the risk from all sources of flooding to and from development	-	Site comprises open space in a natural form. Small parts of site have low to medium risk of surface water flooding.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat cluster opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site comprises green infrastructure which would be lost to development. Site also has a risk of surface water flooding.
11. To improve soil quality	0	Site presumed not to be contaminated.
12. To minimise and sustainably manage waste	0	Site does not contain any buildings on site which could be re-used.
13. To make the best use of land available.	-	Delivery of 24 dwellings would deliver a site density of 37dph which is less than CPP1 density targets, however may be reflective of site constraints.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could deliver 24 dwellings. This should include 40% affordable housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. All situated within desirable walking distance including shops (c.1600m), primary school (c.625m), health (c.190m), park (c.400m), and secondary school (1,460m).
16. To improve health and well-being, and reduce inequalities in health.	+	Good access to services. All situated within desirable walking distance including shops (c.1600m), primary school (c.625m), health (c.190m), park (c.400m), and secondary school (1,460m). However development of site would result in loss of open space, for which there is a deficiency within the ward, and could also be subject to air and noise quality issues.
17. To improve community safety, and reduce crime and fear of crime.	++	Site located within 50% most deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local	0	Site identified for housing only. Site not in former employment uses.

employment needs.		
<b>Overall Summary and Policy Considerations</b>	Mixed with more potential for adverse impacts than positive impacts	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: SDNP due to location within urban area; transport as site as good access to sustainable transport and services; soil quality as site unlikely to be contaminated; access and health due to proximity to services; community safety as site not within an area of high crime deprivation; economy as development would not result in loss of employment land. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings as there are none on site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity: specifically protected trees; open space as the entire site is designated natural/semi-natural open space; designated heritage assets as within a Conservation Area and adjacent to a listed structure; air and noise quality as adjacent to the AQMA and site suffers from railway noise; water pollution as is within GSPZ2; flood risk part of site has risk of surface water flooding; and climate change adaptation as could result in urbanisation of an undeveloped site of natural form. The site is not within close proximity of a potential heat cluster. Delivery of 23 dwellings would not meet CPP1 density targets.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 24 dwellings are provided, this should include 40% affordable. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.</p>



**SA site assessment: Land West of Homeleigh, Patcham**

**(NB: SITE NOT ALLOCATED POST REVIEW)**

<b>Site Description</b>	A PDL site within a residential area, in use as a surface level car-park for adjacent flats.
<b>Site Area</b>	0.15ha
<b>Current Use</b>	Private car-park
<b>Potential Use</b>	Potential for 23 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to, or within the setting of any designated heritage assets and has no potential for archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	The site is situated within desirable-acceptable walking distance to local shops, schools and health services. However, site not situated within close proximity to a regular bus service with the nearest bus service running 3 times per hour. Site considered to be situated within an area where the car is the preferred mode of transport.
6. To reduce air and noise pollution.	++/-	Site not within AQMA. Site in close proximity to rail-track and subject to rail-noise exceeding 50dcbcls.
7. To improve water quality	--	Site within GSPZ 1.

(ecological, chemical and quantity status)		
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL. Within Flood zone 1. No risk of surface water flooding on site.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within or in close proximity to a potential heat network cluster.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on current use.
12. To minimise and sustainably manage waste	0	No buildings on site therefore no potential to make use of buildings on site.
13. To make the best use of land available.	++	Development of the site would provide the opportunity to make better use of a site which is used for car-parking. If 23 units of housing are delivered, this would give a site density of 153dph which far exceeds density requirements in CPP1.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 23 units of housing could be delivered. This should include 40% affordable.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Some services within desirable walking distance including primary school (760m), secondary school, and other services within acceptable walking distance including health (530m), shops (480m) and recreation (600m).
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to majority of services. Some services within desirable walking distance including primary school (760m), secondary school, and other services within acceptable walking distance including health (530m), shops (480m) and recreation (600m). Development of site will not result in loss of open space and the site has good air quality, although it is recognised that there may be rail noise issues.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 40% least deprived SOA (crime) domain.
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable dwellings. Site within 30% least deprived (education) and 40% least deprived (employment) domains and may therefore not present the opportunity to provide jobs/skills opportunities for locally deprived communities.
19. To contribute towards the	0	Site identified for housing only. Site not in former employment uses.

<p>growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.</p>		
<p><b>Overall Summary and Policy Considerations</b></p>		<p>No issues:  Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; heritage as does not contain any heritage or archaeological designations; SDNP due to location within urban area; air quality as site located outside the AQMA; flood risk as site not at risk of tidal, fluvial or surface water flooding; climate change adaptation as site entirely PDL; soil quality as site unlikely to be contaminated; access and health due to proximity to services; community safety as not within an area of high crime deprivation; economy as development would not result in loss of employment land. Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings as there are none on site.</p> <p>Potential adverse effects:  Development of the site could raise issues with water pollution as is within GSPZ1. The site is not within close proximity of a potential heat cluster. In addition, rail noise is an issue on the site and the site does not have good access to frequent sustainable transport modes, which could impact upon how people travel.</p> <p>Potential positive effects:  Development of the site would have positive impacts for housing. If 23 dwellings are provided, this should include 40% affordable. Delivery of 23 dwellings would provide a site density of 153dph which would help to make the best use of land. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement.</p>

**SA site assessment: Urban Fringe Site 31, Land east of Whitehawk Road**

<b>Site Description</b>	An urban fringe site comprising publically accessible designated open space of the allotments typology. Whole site is within Whitehawk Hill Local Nature Reserve.
<b>Site Area</b>	9.1ha
<b>Current Use</b>	Statutory allotments with 177 plots, all in use, with waiting list in operation.
<b>Potential Use</b>	UFA 2014 and UFA 2015 indicated site could have potential for c.50 dwellings on 1ha of the site.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site contains Whitehawk Hill Local Nature Reserve designated due to the presence of calcareous grassland, a BAP habitat and rare species including some butterflies. The UFA 2015 found presence of semi-improved neutral grassland in parts of the site. Allotments present on site which are also a LBAP priority habitat. UFA 2015 concluded that development would result in loss of habitat in the LNR and would increase risk of recreational pressure which would require mitigation.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprises publically accessible open spaces of the allotments typology. Residential development on the site would result in losses in this provision. Noted that the allotments are well-used with a waiting list in operation and that there are waiting lists in operation across most allotments in the city. Any loss of allotments would need to be re-provided elsewhere in the city.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Although the site is within urban area and surrounded by development to the east and south, the hill is a distinctive topographical feature which is prominent in seaward views from the SDNP. However UFA 2015 concluded that some development on the eastern edge of the site would be unlikely to have a significant adverse effect.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site lies within the Whitehawk ANA. The Whitehawk Camp SM lies immediately to the north-west of the site. Conservation Areas and a Registered Park and Garden are also within fairly close proximity, but not adjacent to the site. UFA 2015 concluded that the area had very high archaeological potential however archaeological deposits are likely to have been truncated due to the presence of the allotments which reduces the potential and which would require further investigation.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	Site has fairly good access to a bus stop offering regular services (600m – Eastern Road), however most services are located some distance from the site which could influence mode of travel.

6. To reduce air and noise pollution.	++	Site not within AQMA. Site does not suffer from road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	Within flood zone 1. No risk of surface water flooding on site. No historic flooding incidents recorded. Groundwater levels more than 5m below surface therefore low risk of groundwater flooding. However greenfield site which will play a role in water absorption.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.90% of site) will retain greenfield functions.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land available.	+	A housing density of 50dph would be achieved on that part of the site if 50 dwellings are delivered. This meets minimum density targets as required by CPP1 CP15. This would enable some ecosystem services to be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 50 dwellings would contribute towards local housing need. Site should deliver 20 affordable units. As an urban fringe site, family type housing may be able to be delivered.
15. To improve the range, quality and accessibility to services and facilities.	-	Site has fairly good access to sustainable transport and primary schools are located within desirable walking distance. However other key services, including health (1,700m) secondary schools (4570m) and shops (900m) are located more than preferred maximum walking distance.
16. To improve health and well-being, and reduce inequalities in health.	--	Site has fairly good access to sustainable transport and primary schools are located within desirable walking distance. However other key services, including health (1,700m) secondary schools (4570m) and shops (900m) are located more than preferred maximum walking distance. In addition, development of site would result in loss of allotments, which can contribute significantly to physical and mental health, provide facilities for social interaction and also provide healthy, low-cost food, potentially for people within an area of high social-economic deprivation.
17. To improve community safety,	-	Site is within 20% most deprived SOA (crime deprivation). Any development would need to incorporate

and reduce crime and fear of crime.		features to design out crime.
18. To increase equality and social inclusion	-/+?	Site has potential to deliver 40% affordable housing. Site located within 10% most deprived SOA (education and employment domains) and therefore could provide opportunities to improve local skills and employment opportunities. However, loss of allotments could impact on communities who already suffer from high levels of socio-economic deprivation, although this would depend on who uses the allotments.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Development of site would not result in any losses in land in employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed but predominantly adverse	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: air and noise quality as site is located outside the AQMA and is not subject to high levels of road noise; water quality as site outside the GSPZ; soil quality as site unlikely to be contaminated; economy as development would not result in any loss of employment land; site has no risk of surface water or groundwater flooding. Development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity as the entire site is an LNR and has habitats within LBAP and protected species, although it is noted that the UFA2015 concluded that mitigation including enhancement of LNR, and restoration of calcareous grassland should reduce the potential of significant adverse effect; loss of publically accessible open space of the allotments typology which is difficult to re-provide in the city; landscape due to prominence of the feature although it is noted that the UFA 2015 concluded that development along the lower eastern edge would not result in a significant landscape effect; heritage and archaeology as the higher land of the site is likely to be within the wider setting of the Schedule Monument although the lower part of the site is not and has low potential for archaeology due to the presence of allotments, and that a programme of archaeological evaluation would be required to inform future decisions; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. In addition access to various services is fairly poor, and loss of open space,</p>

		<p>particularly allotments could impact upon physical and mental health and may particularly impact upon people who are already living within a socio-economic deprived area. The site is situated within an area of high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 50 housing units are provided, this should include 40% affordable dwellings and the site may also be suitable for family type housing. Delivery of 50 units would provide a site density of 50dph and would enable greenfield/ecosystem services to be retained on the site, such as SUDS and flood prevention measures, helping to make good use of the site and having wider environmental benefits. Development could provide employment/training for locally employment/skills deprived communities.</p>
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#### SA site assessment: Urban Fringe Site 37 Roedean Miniature Golf Course

<b>Site Description</b>	An urban fringe site comprises designated open space of the golf course typology. The site forms part of a green strip that runs alongside the A259 extending from Brighton to Rottingdean.
<b>Site Area</b>	17ha
<b>Current Use</b>	In use as golf course
<b>Potential Use</b>	UFA 2014 concluded site had potential for 25 dwellings on part of site.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	--	No nature conservation designations on site. UFA 2015 found the area with potential was found to support amenity grassland, which is of low ecological value and the UFA 2015 concluded that minimal ecological mitigation would be required and that development could provide opportunities for enhancement. Noted that southern part of the site is within the SSSI.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Whole site is publically accessible open space comprising a miniature golf course. Development on site could impact on the ability of the golf course to run effectively.
3. To protect, conserve and enhance the South Downs National Park and	-	SDNP adjoins the eastern edge of this UF site, although not the area with potential. The site is an important part of the setting of Roedean School which is within the SDNP and although the site is split by a road, the

its setting, and improve sustainable access to it.		entire site forms part of a continuous open ridge that extends inland to Woodingdean. UFA 2014 concluded that a small amount of development at the western edge would have less landscape impact than development elsewhere on the site. UFA 2015 also concluded this provided that dwelling footprints were of similar scale to those adjacent.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	Within the setting of Grade II listed Roedean School c.750m from site. Whole site within Roedean ANA. Undeveloped nature of site could mean that archaeological potential is high.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	Fairly good access to regular public transport (880m) however most services are located some distance from the site which could influence mode of travel.
6. To reduce air and noise pollution.	++	Site not within AQMA and development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality. Part of site with potential for development does not suffer from road noise, however parts of site adjacent to the A259 do suffer from higher levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	Within flood zone 1. Eastern border of site has low-high risk of surface water flooding on site. No recorded flooding incidents on site. Groundwater levels 5m below surface meaning risk of groundwater flooding is low.
9. To reduce emissions of greenhouse gases that cause climate change	+	Within Brighton Marina heat network opportunity area although unknown whether it could connect.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.95% of site) will retain greenfield functions.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land	+	A housing density of 25dph would be delivered in 25 dwellings are delivered, which is lower than CP14 targets.



available.		This is reflective of the wider area but is lower than the minimum targets expected through CP14 however takes into consideration the need to reduce likelihood of other adverse effects such as landscape. This would enable some ecosystem services to be retained on the remainder of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 25 dwellings would contribute towards local housing need. Site should deliver 10 affordable units. As an urban fringe site, family type housing may be able to be delivered.
15. To improve the range, quality and accessibility to services and facilities.	-	Some services considered to be within acceptable walking distance including park (c.400m), and primary school (c.1,400m) however secondary schools at preferred maximum and other services more than preferred maximum including health (c.1,800m) and shops (750m). secondary schools (c.4,100m).
16. To improve health and well-being, and reduce inequalities in health.	-	Some services considered to be within acceptable walking distance including park (c.400m), and primary school (c.1,400m) however secondary schools at preferred maximum and other services more than preferred maximum including health (c.1,800m) and shops (750m). secondary schools (c.4,100m). Loss of part of site could impact on ability of golf course to run effectively, which could impact on health through reducing ability to take physical activity.
17. To improve community safety, and reduce crime and fear of crime.	+	Site located within 40% most deprived SOA.
18. To increase equality and social inclusion	++	Site has potential to delivery 40% affordable housing. Site situated within 10% least deprived SOA (employment domain) and 50% least deprived SOA (education domain) however is close to areas with higher levels of deprivation and could provide opportunities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Although development would not result in loss of employment floorspace, development could impact on the ability of the golf course to run effectively.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:  Development of the site is unlikely to raise any issues with the following objectives: air quality as site located outside the AQMA and road noise; water quality as site located outside a GSPZ; flood risk as limited risk of surface water flooding on site; soil quality as site unlikely to be contaminated; Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site. Site is within the Brighton Marina Heat Network opportunity area.</p> <p>Potential adverse effects:  Development of the site could raise issues with biodiversity (due to proximity to the SSSI) although it is note the</p>

	<p>UFA2015 found the actual site to have low ecological value; loss of open space and impacting on ability of golf course to run effectively also having impacts on economic development; landscape due to proximity to SDNP and within the setting of features within the SDNP; archaeology as site within ANA and heritage as within setting of Grade II listed building; and climate change adaptation as would result in urbanisation of a greenfield site. Access to most services is poor, which could also impact upon health.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 25 housing units are provided, this should include 40% affordable and the site may be suitable for family-type housing. Although delivery of 25 housing units would provide a site density of 25dph which is less than 50dph expected by CP14, and may not make the best use of the land, this would enable some greenfield functions/ecosystem services to be retained on sites, SUDS and flood prevention measures having wider environmental benefits. The development may provide employment/training for adjacent deprived communities.</p>
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## Appendix G CPP2 Policy Appraisals

*It should be noted that where there is no anticipated impact for a particular SA objective, the SA objective has not been included within the appraisal template, unless there is a need to justify why there is no impact.*

### Housing, Accommodation and Community

#### DM1 Housing Quality, Choice and Mix

##### Options Stage (Housing Quality Choice and Mix)

- Option 1) No specific policy but rely on the NPPF
- Option 2) Have individual policies in CPP2 covering the following separately: Housing Quality – addressing standards; Housing Choice; Housing Mix
- Option 3) Have a single policy in CPP2 covering housing quality, choice and mix

**This policy is considered to be linked to option 3 of these options.**

##### Options Stage (Private Amenity Outdoor Space)

- Option 1) Policy to require the provision of useable private outdoor amenity space in new residential development.
- Option 2) Policy setting out more detailed specifications for private outdoor amenity space. This would include minimum space standards for types of outdoor private amenity space by the type of residential development and/or the number of bedrooms/number of persons occupying residential unit.

**This policy is considered to be linked to option 1 of these options**

##### Assumptions

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of housing development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)

1. To protect, conserve and achieve a net gain in biodiversity	+?	+?	+?	This option could have a positive impact on this objective, as private amenity space could be used to provide opportunities to achieve net gains in biodiversity. The supporting text recognises amenity space as offering this potential. However this would depend on implementation by homeowner and is therefore uncertain.	I	T
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	0	There are no impacts on this objective. Impacts of housing development on this objective addressed by other policy. Private amenity space does not fall within the definition of open space. There is therefore no direct link to this objective.		
13. To make the best use of land available	-	-	-	<p>The policy sets out the minimum amount of internal floorspace that a dwelling must provide, according to the number of bedrooms and number of people who will be occupying the dwelling. It also sets out information regarding floor area of bedrooms.</p> <p>The policy requirements will lead to dwellings being delivered that meet these requirements, and prevent dwellings being delivered that are smaller. This could have adverse impacts of this objective as may result in fewer dwellings being delivered due to the increased amount of space required, when compared with not having the policy. As the city is severely constrained and demand for housing is high, it is imperative that development makes the best use of sites in the city.</p> <p><b>Mitigation</b> Emerging CPP2 policy on maximising site potential should help to ensure that the full and effective use of sites is made.</p>	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	<p>The policy requirements relating to minimum sizes should result in higher quality of housing, across all types, being delivered.</p> <p>The requirements for all units to be accessible and adaptable, and for a proportion of units in larger schemes to be suitable for a wheelchair user will help to ensure that the housing needs of certain sections of the community are met.</p> <p>The requirement for a range types , tenures and sizes of housing to be delivered, and for schemes to provide a range of housing products, e.g. starter homes, built for rent and co-operative housing, should help to ensure a wide range and choice of housing is delivered to meet local demand and needs.</p>	D	P

				<p>The policy requires all new residential development to provide usable private amenity space. The policy does not set out the size to be provided but requires the space to be appropriate to the scale and character of the development, therefore providing a flexible approach. The supporting text provides further guidance in terms of what the space should be able to accommodate, e.g. table &amp; chairs, waste storage and clothes drying space.</p> <p>The availability of private outdoor amenity space within housing developments helps to ensure that decent quality housing is delivered, and therefore contributes positively towards this objective.</p> <p>Overall impacts should be significantly positive.</p>		
16. To improve health and well-being, and reduce inequalities in health	++	++	++	<p>Housing is one of the wider determinants of health. The availability of housing and the provision of quality housing both have positive benefits for health. The policy requirements relating to minimum sizes is one of the factors that should help result in a higher quality of housing being delivered and this should impact positively on the health and well-being of all inhabitants. The policy requirements for a certain proportion of dwellings to be suitable for a wheelchair user would have direct health benefits for those specific inhabitants, again through increasing provision of this type of housing and for ensuring it is of an appropriate size. In addition, the policy requirements for a wide range of housing types and housing products to be delivered should increase the choice available and help to meet a wide range of needs.</p> <p>The provision of private outdoor amenity space is considered to have a positive impact on health, well-being and quality of life. The policy requires the space provided to be appropriate to the character of the development, which allows some flexibility in approach to the type of space provided.</p> <p>Overall impacts are considered to be significantly positive.</p>	D	P
18. To increase equality and social inclusion	+	+	+	<p>The policy requires all units to be adaptable and accessible. This should help to ensure older people, younger people, people with young children, and people with mobility issues can access their homes and can adapt them to meet their needs. In addition, the policy requires a certain proportion of units delivered on larger schemes to be suitable for a wheelchair user, and therefore will help to ensure the housing needs of people who use a wheelchair are provided.</p> <p>The policy is considered to help to meet the housing needs of some people</p>	D	P

				<p>with protected characteristics, and should therefore have positive impacts on this objective.</p> <p>The provision of a range of housing types, including different tenures, may also help contribute towards reducing housing based deprivation.</p> <p>Following an SA recommendation on an early version of the Amenity Space policy, the supporting text was amended to include a reference to ensuring outdoor space meets the needs of the intended occupier, e.g. older people and/or specialist housing for disabled people. This addition is found to have a positive impact on this objective as should help to ensure the needs of people with protected characteristics are met.</p>		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	<p>The housing market is intrinsically linked to the economy. The availability of a wide range of housing types is imperative in ensuring that the housing needs of a diverse population can be met, and in ensuring a diverse range of workers can be housed.</p> <p>The policy should help ensure that a diverse range of housing types is delivered which should impact positively on this objective. The policy is also considered to be flexible, in relation to certain requirements, which should help to ensure that development is not restricted.</p>	I	P

## Summary

- The policy should have significant positive impacts for the objectives relating to housing and health. The policy should help to ensure a range of housing types are provided enabling the city's diverse housing needs to be met, and that all housing that is provided is of a good quality, particularly in relation to size and access, as well as containing private outdoor having benefits for well-being and delivering one of the wider determinants of health.
- The policy should also have positive impacts for the objective relating to equalities, as should result in the delivery of a proportion of housing which is suitable for wheelchair users, helping to meet the needs of some people with protected characteristics, and also through the delivery of accessible and adaptable homes, which could be of particular benefit of people with protected characteristics, including younger, older and ambulant disabled people. In addition, the policy was amended following initial SA assessment to incorporate wording that was also found to impact positively on the equalities objective. The supporting text requires consideration that outdoor space will be appropriate to the needs of the intended occupier, e.g. disabled people, and this should help to ensure the needs of people with protected characteristics are met.

- The policy should also have positive impacts for the economy objective, as should result in the delivery of a wide range of housing types that will help to meet a diverse populations’ needs, contributing to wider economic growth. The policy is also considered to be flexible in its approach, which should ensure that house-building is not inhibited through requirements.
- The policy could also have positive impacts for the biodiversity objective, as the space could be used to provide net gains or habitat for biodiversity, although will be dependent on implementation by the homeowner.
- The only objective where the policy was found to have potential for adverse impact is the objective relating to making the best use of land, as the standards for minimum floor-sizes may prevent smaller units from being delivered, and may result in fewer units being delivered on a plot when compared to not having the requirements in place.

### Recommendations and mitigation

- The initial SA of an earlier draft of the Amenity policy found the impacts on the equalities objective to be uncertain and recommended some additional supporting text to help ensure the needs of people with protected characteristics are met. This recommendation was implemented and this changed the score to a positive impact.
- There are no further recommended changes. Mitigation is considered to be provided by emerging CPP2 policy “Maximising site potential”, which should ensure that full and effective use of sites is made in the city.

### CPP2 Policy Appraisal: DM2 Retaining housing

#### Options Stage

3. Having no specific policy in CPP2
4. Set out an ‘in principle’ general DM type policy that seeks to avoid a net loss of housing but provides for appropriate exceptions through criteria

**This policy is considered to be linked to option 2 which was the preferred approach**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city’s historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Some of the housing in the city is located within listed buildings. The policy allows for loss of C3 housing where the change of use would enable the preservation of a heritage asset. The policy could therefore have positive impacts on this objective and may help bring a heritage asset back into use.	D	P

13. To make the best use of land available	+	+	+	The need for housing is high in the city, and therefore the retention of existing C3 will protect the housing stock and help to meet this need. Allowing change of use to certain uses could help to make better use of buildings as could bring vacant/under-used buildings back into other use, or could result in a different identified need being met, e.g. community use. Impacts should be positive.	D	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy seeks to retain existing C3 housing, which would have positive impacts for this objective however sets clear criteria where loss or change of use would be permitted. This includes where a net gain of affordable units would be delivered, where the loss would enable sub-standard accommodation to be enlarged and thus improved to meet space standards, and where the loss would result in delivery of family-sized homes (e.g. through de-conversion/amalgamation of small flats into family sized home). All of these would result in positive impacts for this objective as could result in an increased number of affordable homes, an improved standard of accommodation, and/or family sized homes. In addition, the policy clarifies that change of use from C3 to C4 (HMO would be assessed under different policies). Impacts are considered to be significant.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	Although the policy seeks to protect C3 housing and resist change of use, the policy does allow change of use to a community use where there is an identified need (in accordance with the Infrastructure Delivery Plan). This would have positive impacts on this objective as would help to increase provision of services where needed.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Housing is one of the wider determinants of health, and poor housing can have a detrimental impact on health. The policy should have positive impacts on this objective as it seeks to protect existing C3, however also allows for loss of C3 where there would be a net gain in affordable units, or where it would result in sub-standard accommodation being improved.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	0	0	0	The policy would resist change of use from C3 to other uses, including employment uses. Although this may have an adverse impact on this objective, as would prevent change of use to employment uses, it is considered that this would be unlikely to take place in practice due to the value of residential land and need for housing. Impacts are therefore considered to be negligible.		



## Summary

- The policy has potential for significant positive impacts on the objective for housing as seeks to retain existing housing provision, however allows for loss or change of use in certain circumstances, including where there would be a net gain in affordable units, where there would be an improvement in terms of meeting space standards, or where the proposal would lead to a type/size of dwelling being delivered that is in need in the city. The policy therefore contributes to meeting various housing needs in the city and improving housing standards.
- The policy also has potential for positive impacts on the objectives for heritage, access to services, making the best use of land, and health. The policy could result in the preservation of heritage assets and could result in increased provision of community facilities through allowing change of use, both of which may help to make the best use of land/buildings particularly where buildings are under-used/vacant. The policy could also lead to the improvement in the standard of some accommodation, as well as support delivery of affordable housing, which would impact positively on health.
- The policy is considered to have negligible impacts on the objective for economic development, as although the policy would resist change of use from C3 to employment uses, in practice this is considered unlikely to constrain land for employment uses due to residential land values and the need for housing.
- No impacts on other objectives.

## Recommendation

- There are no recommendations or requirements for mitigation.

## CPP2 Policy Appraisal: DM3 Residential Conversions and the Retention of Smaller Dwellings

### Options Stage – options considered

- Option 1) No policy in City Plan.
- Option 2) Criteria based policy to assess residential conversions and the retention of smaller dwellings.
- Option 3) Incorporate issues regarding residential conversions into other policies, namely that which refer to National Space Standards (Housing Quality, Choice and Mix)

**This policy is considered to be linked to Option 2, which was the preferred option.**

### Assumptions

- This SA assessment only assesses the direct contents of this policy.

- Assume that the general potential impacts of housing development, including any increase in resources use resulting from conversions etc, will be addressed, and all other requirements, e.g. standards of CP8 and other emerging policies, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Residential conversions of a listed building may harm the special character of the building and would require listed building consent. The policy has 3 key criteria including one which stipulates that at least one unit of accommodation must be suitable for family occupation. However, this criteria does not apply where a different mix of unit sizes is considered essential to preserve the character of a listed building. This should help to ensure that conversions result in preservation of listed buildings.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	0	0	0	Although it is recognised that the conversion of a dwelling into two or more residential units could result in an increase in localised car ownership, the policy itself is not considered to have any direct impacts on this objective. In addition, the policy only allows conversions of dwellings of over 124m <sup>2</sup> , and this should prevent conversion in areas with existing higher dwelling densities where an increase in localised car ownership may have more of an adverse impact.		
13. To make the best use of land available	++	++	++	Converting 1 dwelling into 2 or more dwellings can help to increase provision of housing through using the existing stock, and may also help to reduce under-occupancy. This would help to make the best use of the existing building stock and therefore has a positive impact on this objective. Retaining smaller dwellings also helps to make the best use of existing housing stock by ensuring that a good standard of accommodation is maintained and this also helps to ensure the housing needs of smaller households continue to be met, with approximately 59% of housing need being for 1 and 2 bed properties. The policy is considered to have significant positive impacts on this objective as provides clear policy on when conversions will be permitted, and could help bring forward successful applications.	D	P
14. To provide housing, including	++	++	++	Converting 1 existing dwelling into 2 or more dwellings can help to boost	D	P

affordable housing, to contribute towards meeting local needs				housing supply, particularly for smaller households, with need for 1 or 2 bedroomed properties constituting 59% of housing need. In addition, the policy requirements will ensure that smaller dwellings (<124sqm) are retained, which will help to maintain the stock of existing smaller dwellings and also helps to ensure a good standard, in terms of size, of accommodation is maintained. Policy requirements will also ensure that the conversions result in at least one unit of accommodation that has at least 2 bedrooms, helping to ensure the needs of smaller family households continue to be met and helping to maintain a mix of sizes of dwellings in the city. The policy also has some consideration of the existing occupants, and also may help to meet the specialist housing needs of certain people. Impacts considered to be significantly positive.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Housing is one of the wider determinants of health. The policy sets out clear criteria regarding permission of conversion applications and should help to increase housing stock from this source. It also helps to protect smaller dwellings from conversion, which will help to retain existing smaller dwellings in the city and help to meet the need for smaller dwellings, as well as help to ensure that at least one of the new units is suitable for family occupation and therefore also contributes towards meeting this particular housing need. The policy requirements will also help to ensure that new converted housing meets nationally described space standards, below which residential amenity and health may be compromised. The policy doesn't include other criteria relating to protection of residential amenity, however these issues will be addressed by other CPP2 policy.	I	P
18. To increase equality and social inclusion	+	+	+	An increase in the provision of housing may help to reduce housing-based deprivation (measured on over-crowding, rates of homelessness and difficulty in owner-occupation). The policy sets out reasons whereby the criteria which requires provision of at least one 2-bedroomed dwelling, does not need to be met. This includes when the housing will be for people with specialist housing needs. The policy nor supporting text does not stipulate which types of people may have specialist housing needs, but it is assumed that it could be for disabled or older people, or for people with other protected characteristics. This would	D	P

				have positive impacts on this objective.		
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### Summary

- The policy has the potential to have significantly positive impacts on the objectives relating making the best use of land and housing. The policy may help to bring forward successful conversion applications, help to increase the supply of housing from within the existing housing stock, making the best use of land and increasing housing provision. The policy also helps to ensure a range of housing sizes is maintained, including through the retention of existing smaller dwellings, but also through the requirement for newly converted dwellings to include a minimum of a two-bedroomed dwelling, helping to meet the needs of different sized households.
- The policy also has the potential to have positive impacts on health, with housing being one of the wider determinants of health, and also through ensuring that the size of housing does not fall below the nationally described space standards. The policy may also have positive impacts on built heritage, through the exception to policy criteria which would result in the preservation of a listed building instead of a 2-bedroomed dwelling. The policy may also have positive impacts on equalities as could help in delivery of housing for people with specialist housing needs, which could include people with protected characteristics.

### Mitigation & Recommendation

- No further recommendations or mitigation.

### CPP2 Policy Appraisal: DM4 Housing and Accommodation for Older Persons

#### Options Stage

- Option 1) No specific policy but rely on NPPF (para 50)
- Option 2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing
- Option 3) Have a single policy in CPP2 covering older persons and specialist housing

**This policy is considered to be reflective of option 2.**

#### Assumptions

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of housing development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The policy requires new development to include provision of landscaped outdoor space for informal recreation having positive impacts on this objective.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	The policy requires new development to be accessible to public transport and various services and facilities. This should result in development being sustainably located and may reduce the need to travel by car having positive impacts on this objective.	D	P
6. To improve air and noise quality	+	+	+	The policy may help to reduce the need to travel by car, which could have positive impacts on this objective.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy will support delivery of housing for older people and will therefore help to address the housing needs of this group of people, which are likely to increase in the future based on local population demographics, with it projected that there will be a 40% increase in people aged over 60 by 2030. The policy requires development to comply with CP20 affordable housing and should therefore also result in delivery of affordable housing for older people. The policy requires housing to comply with the Housing Quality, Choice and Mix policy, which should ensure that a good standard of housing is delivered. The policy also allows loss of accommodation for older people where the provision is not capable of meeting modern standards, which could help to reduce provision of sub-standard accommodation. The policy may indirectly enable the release of family-type housing back into the market, e.g. housing that was being under-occupied by one older person, due to lack of move-on accommodation.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy requires development to be accessible to public transport and various services, such as shops and community facilities, and will therefore enable access and have a positive impact on this objective.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	Housing is one of the wider determinants of health. Housing that meets an older person's specific needs, including their health needs, will contribute significantly towards their health, particularly as the prevalence of long-term conditions increases with age.	D	P

				The availability of certain types of accommodation, e.g. sheltered housing and extra care housing, can enable older people to live more independently for longer, and can help to support their health needs, support good mental health and well-being. Additionally, the requirement for development to provide communal space and outdoor space will provide the opportunity for interaction, reducing the risk of isolation, also helping to support good mental health.		
17. To improve community safety, and reduce crime and fear of crime	+?	+?	+?	The policy requires development to provide communal space/outdoor space for information recreation. This could have positive effects on this objective as may provide the opportunity to provide passive surveillance, however is also fairly uncertain. The policy also requires development to contribute towards creating mixed and inclusive communities, which could help improve community cohesion and help improve community safety.	I	P
18. To increase equality and social inclusion	++	++	++	This policy specifically and positively targets older people, which are a group with protected characteristics, by supporting development that will help to meet their accommodation needs. The requirement for developments to be accessible to public transport and services should also help reduce the risk of isolation. The requirement for an element of affordable housing to be delivered as part of any scheme should also help to meet the needs of those with lower incomes which is important in the city, as the city has a higher percentage of pensioners in poverty compared to the England average.	D	P

### Overall Summary

- The policy should have significantly positive impacts for the objectives relating to housing, health and equalities. The policy should help to ensure the housing needs of older people, who are a group with protected characteristics, are met through support for a range of different types of housing and affordable housing that complies with current quality standards. The provision of quality and suitable housing has health benefits in itself, and housing specifically for older people could help to support and manage the health needs of older people. The requirement for development to provide spaces that would enable community interaction also contributes towards good mental health and well-being and can help to reduce the risk of isolation. The policy may also indirectly free-up larger properties in the city that are being under-occupied through helping to provide suitable move-on accommodation, which has positive implications for the wider housing market.
- The policy should also have positive impacts on the objectives for open space, reducing the need to travel, air quality, access and community safety, although impacts on this objective were fairly uncertain. The policy should lead to delivery of open spaces within the developments, providing

opportunities for community interaction and passive surveillance, potentially supporting community safety. The policy should also help to ensure that developments are sustainability located in relation to public transport and local facilities, which will enable access to services and may help to reduce the need to travel by car, having air quality benefits.

**Recommendations and Mitigation**

- There are no recommended changes or requirements for mitigation.

**CPP2 Policy Appraisal: DM5 Supported Accommodation (specialist and vulnerable needs)**

**Options Stage**

- Option 1) No specific policy but rely on NPPF (para 50)
- Option 2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing
- Option 3) Have a single policy in CPP2 covering older persons and specialist housing

**This policy is considered to be reflective of option 2.**

**Assumptions**

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of housing development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	Policy requires development to be accessible and appropriately located to meet the needs of the intended occupiers. This should have positive impacts on this objective as may help inform travel choice, either by residents or visitors		
14. To provide housing, including affordable housing, to contribute	++	++	++	The policy will support delivery of temporary or permanent housing for people with specific needs, including the homeless and disabled people and will	D	P

towards meeting local needs				therefore help to address the housing needs of these people. The policy requires housing to comply with the Housing Quality, Choice and Mix policy, which should ensure that a good standard of housing is delivered, or to comply with other national standards and regulation (e.g. Care Quality Commission standards).		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy requires development to be accessible, which should help access services for residents.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	Housing is one of the wider determinants of health. Housing that meets vulnerable people's specific needs, including their health needs, will contribute significantly towards their health. Additionally the requirement for development to contribute towards creating mixed communities, can help support community interaction and reduce the risk of isolation, also benefitting health.	D	P
18. To increase equality and social inclusion	++	++	++	This policy specifically and positively targets vulnerable people, including homeless people, and disabled people, which are a group with protected characteristics, by supporting development that will help to meet their accommodation needs. The requirement for developments to be accessible should also help reduce the risk of isolation.	D	P

### Summary

- The policy should have significantly positive impacts for the objectives relating to housing, health and equalities. The policy should help to ensure the housing needs of people with specific housing needs, including disabled people, who are a group with protected characteristics, are met through support for housing that complies with current quality standards. The provision of quality and suitable housing has health benefits in itself, and housing specifically for certain people could help to support and manage their particular health needs.
- The policy should also have positive impacts on the objectives for reducing the need to travel and access. The policy should also help to ensure that developments are accessible, which will enable access to services and may help to promote sustainable travel.

**There are no further recommendations or requirements for mitigation**



## CPP2 Policy Appraisal: DM6 Build to Rent

### Options Stage considered:

- Option 1 : Don't include a build to rent policy in CPP2, but rely on emerging national guidance in draft NPPF and PPG.
- Option 2 : Include a build to rent policy including the minimum affordable housing requirements set out in the draft PPG (i.e 20% affordable housing at a minimum rent discount of 20%) rather than reflecting Policy CP20 requirements (40% affordable housing at rent levels to be agreed with the council).
- Option 3: Include a build to rent policy that seeks the provision of affordable housing in line with Policy CP20 (40% affordable housing at rent levels to be agreed with the council).

### This policy considered to be reflective of option 3

#### Assumptions

- Assume that impacts arising from housing development itself are addressed by other policies (e.g. resource use, flood risk, site based impacts etc) and therefore these objectives have been assessed as having no impacts.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	According to the Census over 30,000 people commute into the city for work each day, with key areas being from Lewes, Adur, Mid-Sussex and Worthing. The cost of housing within BH is likely to be a key driver of this. This option would result in delivery of build to rent accommodation including 40% affordable rented housing on larger schemes. This may indirectly help achieve this objective, through potentially reducing the need for people who work in the city to live elsewhere, and therefore reduce the need to in-commute.	I	T/P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	House prices continue to rise in Brighton & Hove, with average prices to buy continuing to be between 6 and 16 times the median household income locally. <sup>16</sup> Average rents are also high and continue to rise, with rents	D	P

<sup>16</sup> In 2017: average prices as follows~ studio flat £175,127 = 6xmedian income; 2-bed flat £376,459 = 12xmedian income; 2-bed house £394,520 = 13xmedian income; 3-bed house £491,768 = 16xmedian income (median household income 29,100) (Housing Strategic Statistical Bulletin)

				<p>representing between 30% and 83% of gross average incomes.<sup>17</sup> A higher proportion of households in BH rent their homes compared with regional and UK average and the OAN for Brighton indicates that over 2,000 affordable dwellings per year would need to be delivered to meet local affordable housing need.</p> <p>All this local evidence shows strong need for both newly built rented accommodation and for affordable rented accommodation.</p> <p>The policy would therefore have a significant positive impact on achieving this objective as would support delivery of this type of housing, would require delivery of a proportion of affordable rented housing, and would require the mix to be in accordance with local needs. Impacts should be significantly positive.</p>		
16. To improve health and well-being, and reduce inequalities in health	++	++	++	<p>Housing is one of the wider determinants of health and therefore this policy should help deliver this health determinant. Policy also has clear to link to policy on housing quality, choice and mix which requires housing to be of a certain size which should also impact positively on health and well-being of occupants.</p>	I	P
18. To increase equality and social inclusion	++	++	++	<p>Physical and financial access to housing are key contributors to housing based deprivation, which is high in BH. The policy would enable delivery of this type of housing, including a proportion of affordable housing, which could help to improve affordability of housing, increase housing provision and therefore reduce housing based deprivation.</p> <p>Policy also as clear link to policy on housing quality, choice and mix which requires a certain proportion of units to be suitable for a wheelchair user, and requires all units to be adaptable and accessible which can help to meet the needs of older people, younger people and people with mobility issues.</p>	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local	+	+	+	<p>House-building is intrinsically linked to economic growth. The policy supports build to rent schemes and should enable these types of schemes to come forward, contributing towards increasing housing stock and therefore supporting economic growth. Provision of this tenure of housing should also</p>	I	P

<sup>17</sup> In 2017, average cost of renting: studio flat was £728 – 30% of gross income; 2 bed flat was £1,318 – 54% of gross income; 4-bed house £2,025 -83% of gross income; all based on median household income of £29,100. (Housing Strategic Statistical Bulletin)

employment needs.				increase the availability of rented accommodation, including provision of affordable rented accommodation, and this could indirectly help local employers to recruit and retain staff, which can help support economic productivity.		
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## Summary

- The policy should have significant positive impacts related to housing, health and equalities. The policy should help to ensure that this tenure of housing is delivered, including a proportion of affordable housing, helping to meet the housing needs of those in the rental market. The policy will enable delivery of one of the wider determinants of health and should ensure that housing is of a certain standard through links to DM1, also supporting health and well-being. The policy should also contribute towards reducing housing based deprivation through increasing access to and affordability of housing, and is also required to be adaptable and accessible, through links to DM1, supporting those with protected characteristics.
- The policy should also have positive impacts for transport and economic development. The policy could help reduce the need for people to commute into the city, due to the lack of availability of affordable housing, and could also help support economic growth, through supporting house-building and also through the possibility for recruitment and retention of staff to improve.

## Recommendations and mitigation

- There are no recommended changes to policy or requirements for mitigation.

## CPP2 Policy Appraisal: DM7 Houses of Multiple Occupation (HMOs)

### Options Stage

- Option 1) No additional policy relating to HMOs in CPP2 – rely on CPP1 Policy CP21, part (ii)
- Option 2) Policy seeking to protect existing HMOs and resist conversion to C3
- Option 3) Policy to support conversion of existing HMOs to C3.

This policy is considered to be linked to Option 3. The policy allows conversion of HMOs to C3 dwellings and also sets out criteria for applications for new build HMOs and for applications for change of use to various types of HMO (C4, C3/C4 or sui generis HMO)

## Assumptions

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of housing development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-/+?	-/+?	-/+?	The policy could have mixed and uncertain impacts on heritage assets and would depend on whether a building was listed or not. If a building was listed, then conversion of an HMO back to C3 dwelling could have positive impacts for the listed building, as may help to restore a heritage asset into its original form. The second part of the policy permits change of use from C3 to HMO, and this could result in adverse impacts for this objective if the dwelling was a listed building, as may cause harm to the special features of the building. Mitigation: Listed building consent would be required in these circumstances, which would reduce the risk of adverse impacts. In addition, other CPP2 Heritage policies would also apply.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	HMOs can be linked to increased localised parking pressures due to higher population densities. The policy could therefore have positive impacts on this objective, as could lead to a reduction in localised car-ownership through support for conversion of HMOs back to C3 dwellings. Additionally, the policy provides clear criteria where applications for new HMOs or change of use to HMOs will be permitted, and this includes criteria which should reduce the risk of proliferation of HMOs in a certain output area and also across the wider neighbourhood surrounding the output area. This could also help to ensure issues such as increased parking pressure are minimised.	I	P
6. To improve air and noise quality	+	+	+	HMOs can be linked to noise nuisance, particularly in areas of high concentration. The policy could therefore have positive impacts on this objective, as could lead to a reduction in noise issues through support for conversion of HMOs back to C3 dwellings.	I	P

				Additionally, the policy provides clear criteria where applications for new HMOs or change of use to HMOs will be permitted, and this includes criteria which should reduce the risk of proliferation of HMOs in a certain output area and also across the wider neighbourhood surrounding the output area. This could also help to ensure issues, such as noise and disturbance, are minimised.		
7. To improve water quality (ecological, chemical and quantity status)	-/+	-/+	-/+	Dwellings in HMO uses tend to use more resources, such as water, than when compared to the original C3 dwelling due to different patterns of behaviour. Therefore conversion of an HMO back to C3 dwelling would have positive impacts for this objective, as may result in less water consumption from the dwelling, whereas change of use from C3 to HMO may result in an increase in water consumption. However, conversion/change of use may provide the opportunity to install measures which improve water efficiency. Impacts considered to be mixed. Mitigation: CPP1 CP8 expects changes of use to meet high water efficiency standards.	I	P
9. To reduce emissions of greenhouse gases that cause climate change	-/+	-/+	-/+	Dwellings in HMO uses tend to use more resources, such as energy, than when compared to the original C3 dwelling due to different patterns of behaviour. Therefore conversion of an HMO back to C3 dwelling would have positive impacts for this objective, as may result in less energy consumption from the dwelling, whereas change of use from C3 to HMO may result in an increase in energy consumption. However, conversion/change of use may provide the opportunity to install measures which improve energy efficiency. Impacts considered to be mixed. Mitigation: CPP1 CP8 expects changes of use to meet high water efficiency standards and emerging CPP2 on energy efficiency requires conversions to meet certain levels of carbon reduction.	I	P
12. To minimise and sustainably manage waste	-/+	-/+	-/+	Dwellings in HMO uses tend to produce more waste than when compared to the original C3 dwelling. Therefore a conversion of an HMO back into a C3 dwelling would have positive impacts for this objective, as may result in less waste produced from the dwelling, whereas change of use from C3 to HMO may result in an increase in waste produced from the dwelling. Impacts considered to be mixed. Mitigation: CPP1 CP8 expects changes of use to minimise waste and facilitate	I	P

				recycling.		
13. To make the best use of land available	+	+	+	The policy would support conversion of HMOs to C3 dwellings. The policy is considered to be flexible and may help to make the best use of the building stock, as may result in an increase in family-sized dwelling in the city, which are in need locally and can be difficult to deliver due to land constraints, and may also help to reduce the number of vacant buildings e.g. through adaptive re-use. The policy also allows for conversion of C3 into HMO if the market decides this is required as well as development of new HMOs. This also could be seen as making a good use of land, as is providing housing for a number of people within one dwelling.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+?	+?	+?	<p>The policy shows support for conversion of all types of HMO back to a C3 dwelling. This may help to increase the availability of family housing in the city, which has been identified as a need in the city and be difficult to deliver due to land constraints.</p> <p>The policy also recognises the importance of HMO accommodation as being a source of lower cost accommodation in the city, which is utilised by students, young professionals and people who are unable to enter the private rented market due to in-affordability. The policy allows HMO accommodation to come forward, either new build or from change of use. However the policy includes numerous criteria, in addition to those within CPP1 CP21 that only allows a development where there is less than 10% HMOs within a 50m radius of the site. The combination of all the criteria could be fairly restrictive in terms of enabling new HMOs to come forward as HMO development can only be supported: where fewer than 20% of dwellings within the wider neighbourhood area are in use as HMOs, where the HMO does not result in a non-HMO being in-between two HMOs, and where the proposal does not lead to a continuous frontage of 3 or more HMOs. Without carrying out detailed area assessments for individual output areas in the city, it is uncertain what impact the combination of these three criteria will have. It could be overly restrictive meaning that this lower cost source of accommodation fails to be delivered, and that the accommodation needs of certain people are not met. However, conversely it may further help to protect family sized/larger properties being in C3 use.</p>	D	P

				The policy is considered to have positive uncertain impacts on this objective as although it supports delivery of housing to meet various needs, the impacts of the approach for new/converted HMOs is fairly uncertain.		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	Although there is no direct impact on this objective, it is acknowledged that a proliferation of HMOs can have adverse impacts on certain services, e.g. viability of schools, although have positive impacts on other services, e.g. pubs and shops. Although the policy itself will neither improve or increase services, it could help to protect services from becoming unviable in certain locations, e.g. through the restrictive nature of the policy in terms of support for new HMOs coming forward, and is therefore considered to have a positive impact.	I	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	Housing is one of the wider determinants of health and therefore this policy, which supports both conversion of HMOs into C3 dwellings, and supports delivery of HMOs in certain circumstances would have positive impacts through supporting delivery of different types of housing meeting different needs including those of students as well as young professionals who live in shared accommodation. In addition, the policy requires new bedrooms in new or converted HMOs to meet internal space standards, which should ensure that inhabitants health is not compromised by sub-standard accommodation. The policy should also minimise the proliferation of HMOs in any one location through various policy criteria, which should help development of mixed and more balanced communities and should also help to reduce the potential for amenity issues, e.g. such as noise impacts. Impacts considered to be significantly positive.	D	P
18. To increase equality and social inclusion	+?	+?	+?	The “Barriers to Housing” domain in the Index for Multiple Deprivation is based on a number of underlying indicators, including housing affordability. 18% of SOA in the city are within the most 20% deprived housing domain in the country, with one of the factors being affordability of housing. HMOs form an important source of lower-cost housing in the city. Although the policy supports conversion of HMOs back to C3, the policy also permits HMOs to come forward provided certain criteria are met, which should ensure that there continues to be this source of housing in the city, however there is uncertainty with regards to whether the policy will be overly restrictive and prevent this type of housing coming forward. See also – objective 14.	I	P

19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	?	?	?	Impacts are uncertain. HMO accommodation is an important source of accommodation for young professionals. If the policy reduces the availability of this type of housing, it could impact upon the workforce, with the city becoming less attractive to work and live in.	I	T/P
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**Summary**

- The policy has potential to have significant positive impacts on the objective for health. Housing is one of the wider determinants of health and the policy should help to ensure different types of housing are provided in the city to meet ranging needs. In addition, policy criteria should help to minimise the amenity impacts associated with HMOs which can impact upon health, and the requirement for HMOs to meet space standards should prevent sub-standard accommodation from being delivered.
- The policy is found to have positive but uncertain impacts for the housing and equalities objectives. The policy shows support for the conversion of HMOs back to C3 dwellings, helping to increase provision of family housing in the city which is an identified need locally. It also supports new build and converted HMO development provided certain criteria are met which should ensure that this important source of low-cost housing is able to be delivered. However there is a certain degree of uncertainty on how readily new HMOs will come forward due to the various policy criteria that need to be met in addition to those within CP21 which could be overly restrictive. The impacts are similar for the equalities objective as although the policy could contribute towards reducing housing deprivation through support for HMOs, it is uncertain how readily new HMOs will come forward due to the policy criteria.
- The policy has potential to have positive impacts on the objectives for transport, as may help to minimise impacts associated with increased localised car-ownership; air/noise quality, as may help to minimise noise amenity impacts; making the best use of land, as may help to make better use of existing stock through adaptive re-use and through provision of family housing which is difficult to deliver due to land constraints; and for access to services as could help to prevent certain services from becoming unviable.
- There is potential for mixed impacts on the objectives for water quality, greenhouse gas reduction and waste. Conversion from HMO into C3 dwelling could lead to reductions in resource consumption and waste production per dwelling, whereas change of use to HMO use could increase consumption when compared to the original dwelling. However, also offers the opportunity to improve efficiency.
- There is also potential for mixed and uncertain impacts for heritage and would be dependent on whether a building was listed or not. Conversion of an HMO back to C3 dwelling could have positive impacts for the listed building, as may help to restore a heritage asset into its original form. Change of use from C3 to HMO could result in adverse impacts for this objective as may cause harm to the special features of the building.
- There is potential for uncertain impacts on economic development, as a lack of HMO accommodation could result in less choice in accommodation for young professionals and impact upon workforce.



## Mitigation & Recommendation

- Mitigation for potential adverse impacts arising from development is considered to be provided by existing adopted policy including CP8 Sustainable Buildings, and emerging CPP2 policy, including those relating to heritage assets.
- It will be important to monitor the impact of this policy, particularly in relation to the amount of applications for new/converted HMOs that are unsuccessful based on the new criteria and whether the accommodation needs of people requiring HMOs are being met.

## CPP2 Policy Appraisal: DM8 Purpose Built Student Accommodation

### Options Stage

Option 1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA

Option 2) Criteria based policy with no preferred sites identified

Option 3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.

**This policy is considered to be linked to Option 3 with clear criteria where PBSA will be permitted, as well as a site allocation as a separate policy.**

### Assumptions

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of housing development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives. However this assessment does consider potential for site based impacts where known.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-	-	-	The supporting text outlines locations where PBSA will be supported, including on university campuses. This includes the University of Sussex campus which is adjacent to SNCIs and could be sensitive to any increased recreational pressure. In addition, Stanmer Park is also adjacent to the campus which includes areas of Ancient Woodland and TPOs. Brighton	I	P

				University campus is also adjacent to an SNCI and Proposed Local Nature Reserve. Mitigation: CPP1 policy CP10 Biodiversity provides for protection of biodiversity, and emerging CPP2 policy addresses impacts on designated sites.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-	-	-	The supporting text outlines locations where PBSA will be supported, including on university campuses. This includes the University of Sussex campus which includes various open space typologies including amenity greenspace, outdoor sports and natural/semi-natural. Development on these sites could result in losses of open space therefore having adverse impacts on this objective. Mitigation: CPP1 policy CP16 Open Space allows loss of open space if development is within an allocation in a Development Plan. However, it also requires that some open space is retained on site. If PBSA on the University of Sussex campus results in some loss of amenity green space, it will be important to ensure that some amenity greenspace is retained on campus and alternative provision provided where possible.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0/-	0/-	0/-	The supporting text outlines locations where PBSA will be supported, including on university campuses. This includes the University of Sussex campus which is adjacent to the SDNP, could include sites of high landscape sensitivity and could therefore have adverse impacts on this objective. CP21 does not include any criteria that considers impacts on the SDNP. Mitigation would be provided by CPP1 policy SA5: Development within the Setting of the SDNP.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The policy does not include any criteria relating to the historic built environment as CP21.2 allows for high density development in locations where they are compatible with existing townscape. This should therefore support the integration of new development into the existing built environment.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	Policy supports PBSA development on University campuses, which will have positive impacts for this objective as will promote active travel and reduce the need to travel. CP21 supports PBSA off campus where located along sustainable transport corridor. Areas well served by sustainable transport can help promote/facilitate sustainable travel.	D	P

				<p>Policy also requires PBSA to include measures which promote sustainable transport use, including measures to prevent students from keeping cars in the city, which should also help promote sustainable travel.</p> <p>In addition, CP21.3 requires PBSA to be located along sustainable transport corridors where travel to University via sustainable means can be maximised. CP21.4 requires proposals to minimise impacts on on-street parking. Impacts should be significantly positive.</p>		
6. To improve air and noise quality	++	++	++	<p>PBSA that is located on campus will have positive impacts for this objective as will support active, non-polluting forms of travel, and also prevent any noise amenity issues from arising. Other policy criteria including measures to promote sustainable transport should also support sustainable forms of travel, having benefits for air quality. Overall impacts are positive.</p>	D	P
8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>Certain areas within the University of Sussex campus and along the Lewes Road and Brighton University campus are located within medium and high risk areas of surface water flood risk. Development in these locations could be at risk of flooding, or could increase the risk of surface water elsewhere.</p> <p>Mitigation: CPP1 CP11 Flood Risk requires development to consider previous flooding events and incorporate appropriate mitigation.</p>	I	P
10. To increase the city's resilience and ability to adapt to climate change	-	-	-	<p>See objective 8. In addition, new development, particularly higher density development can result in increased height and massing within an area, potentially exacerbating the urban heat island effect.</p> <p>Mitigation: CPP1 CP11 Flood Risk and CP8 Sustainable Buildings require development to reduce the urban heat island effect and surface water flood risk.</p>	I	P
13. To make the best use of land available	+	+	+	<p>The policy provides a framework which aims to provide a balance between different and competing development needs of the city, e.g. the need for student accommodation and the need for C3 housing. The policy refers to CP21.7 which prevents PBSA from coming forward on sites identified for housing. It should help to make the best use of land by providing high density development (when looking at number of bed-spaces provided) within locations that are considered to be suitable for student accommodation. In addition, delivery of PBSA may help to ease the pressure on the existing</p>	I	P

				housing stock by preventing the need to convert C3 dwellings into HMOs.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy sets clear criteria where PBSA will be supported, and should therefore help to bring forward successful applications. The policy does not set a numerical target of bedspaces, due to the difficulty of accurately predicting the actual requirements. Delivery of PBSA could also indirectly reduce the need for students to rely on HMO accommodation, and could help prevent further losses of C3 to HMO and may support conversions of HMOs back to C3. The policy also requires developments to provide adequate daylighting and rooms that are an appropriate size, which helps to ensure a quality of housing delivered.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	Policy supports PBSA within university campuses, and CP21 requires PBSA to be located within sustainable transport corridors. Although this will not provide services as such, it will help to ensure that PBSA has good access to some services, having positive impacts on this objective. In addition, delivery of PBSA may help to reduce the need for student HMOs, which can impact detrimentally on viability of some services, e.g. schools. Overall impacts should be positive.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Policy requires adequate daylighting and consideration of design of units and should ensure that rooms are of sufficient size, having positive impacts on the health of the occupants.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Policy criteria 2f requires there to be 24 hour on site security. This should help protect the safety of occupants having positive impacts on this objective.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The student population contributes significantly to the local economy. Provision of PBSA will help contribute towards ensuring the city continues to be attractive to students.	I	P

### Summary

- The policy has potential for have significant positive impacts on objectives for transport, air/noise quality and housing. The policy should reduce the need to travel by car and promotes active travel, through the locations of PBSA either on campus or on sustainable transport routes (in accordance with CP21), having associated positive impacts for air quality. Location of PBSA should also reduce the risk of incompatibility of uses and reduce the risk of noise issues.

The policy should help to bring forward successful applications and should help to boost supply of PBSA. This may also help to reduce reliance on the need for student HMOs, helping to protect housing in C3 uses.

- The policy also has potential to have positive impacts on the objectives for making the best use of land, increasing access, improving health, improving community safety and economic development. The policy should help to strike a balance between competing development needs of the city, and through the delivery of PBSA would help to make better use of land when compared with the alternative of housing students within HMOs. The location of PBSA within areas with good transport links should help increase access to services for those students. The policy should help minimise the risk of adverse amenity impacts and help to protect the health of occupants through design and size of units. Policy requirements should help ensure occupants are safe and secure, and delivery of PBSA helps to contribute towards ensuring the city remains attractive to students, impacting positively on the local economy.
- There is potential for adverse impacts on some of the site based objectives including biodiversity, open space, SDNP, and flood risk due to the preferred locations for PBSA. PBSA could increase recreational pressure on nature conservation sites near the university campus; could result in losses of open space on university campus; could have impacts on sensitive landscape and could be located within areas of flood risk.

### **Recommendations and Mitigation**

- Mitigation for potential adverse impacts arising from development is considered to be provided by CP8 Sustainable Buildings, CP10 Biodiversity, CP11 Flood Risk and emerging CPP2 policy. If PBSA on the University of Sussex campus results in some loss of amenity green space, it will be important to ensure that some amenity greenspace is retained on campus and alternative and/or improved provision is provided where possible.
- No further recommendations

### **CPP2 Policy Appraisal: DM9 Community Facilities**

#### **Options Stage**

- Option 1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)
- Option 2) General policy to protect all community facilities (including pubs)
- Option 3) Specific policy to protect community facilities and additional specific policy to protect pubs

**This policy is considered to be linked to option 3**

#### **Assumptions**

- This SA assessment only assesses the direct contents of this policy.

- Assume that the general potential impacts of community facility development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+?	+?	+?	There may be instances of community uses being located within listed buildings or other heritage assets. The policy allows the loss of community facilities in certain circumstances, including partial loss/change of use. This could have a positive impact on this objective as could help to preserve heritage assets in active uses and prevent vacancy in cases where the community use is unviable for example. This is also fairly uncertain as depends upon whether the community use is located within a heritage asset.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	The policy should have a significant positive impact on this objective. The policy requires new/improved community facilities to be close to the community it serves and also be accessible by sustainable and public transport. In addition, the co-location of community facilities is also supported where feasible. These requirements should ensure that facilities are easily accessible and therefore reduce the need to travel, and should facilitate travel by sustainable means where required.	D	P
6. To improve air and noise quality	+	+	+	The policy should have a positive impact on this objective. Policy requirements relating to accessibility should help to reduce the need to travel or should help to promote more sustainable forms of travel, which could have positive benefits for air quality. In addition, the policy requirements relating to compatibility of uses should minimise the risk of any noise nuisance issues arising.	D	P
13. To make the best use of land available	+	+	+	The policy allows partial loss of floorspace in community uses, and change of use, and sets out clear criteria where loss of community facilities will be permitted. This could have a positive impact on this objective, e.g. could help to bring vacant buildings back into active uses, making good use of existing building stock.	I	P

15. To improve the range, quality and accessibility of services and facilities.	++	++	++	The policy should have a significant positive impact on this objective. The policy supports delivery of new/improved community facilities, and also resists the loss of community facilities. This should help to increase, improve or maintain the range of community facilities and services that are required to meet local needs, including health, education and social/cultural needs. The policy also requires new/improved community facilities to be close to the community it serves and also be accessible by sustainable and public transport. These requirements should ensure that facilities are easily accessible.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	The policy has various links to health. Access to community facilities, including health provision will have direct benefits for health, as well as provide opportunities for community and social interaction, supporting general well-being. In addition, the policy promotes location of development where active travel is possible, having benefits for physical health. The policy also considers the compatibility of uses, which should reduce the risk of amenity impacts, including noise nuisance issues which can have a detrimental effect on health.	D	P
17. To improve community safety, and reduce crime and fear of crime	+?	+?	+?	Access to community facilities could provide opportunities for community interaction. This could contribute towards promoting community safety and have a positive effect on this objective, although is fairly uncertain.	I	P
18. To increase equality and social inclusion	+	+	+	Community facilities include developments such as schools and training centres. The policy could therefore help to increase or retain access to education. Certain community uses often provide services and facilities for people with protected characteristics, therefore retention of existing and creation of new facilities could help to meet the needs of people with protected characteristics, depending on the service delivered. The policy requirements relating to the accessibility of facilities should reduce the risk of transport based social exclusion. The policy is therefore considered to have a positive impact on this objective.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment	+	+	+	Community facilities can provide employment opportunities and can also help to maintain vitality of neighbourhood centres when located within them by helping to provide footfall. Retention of existing and creation of new	I	P

opportunities and meet local employment needs.			facilities could therefore have positive impacts on this objective. The policy is considered to be flexible in its approach by only allowing loss of community facilities in certain circumstances and this is not considered to have adverse impacts on this objective. In particular, allowing change of use including partial change of use, is considered to also contribute positively towards this objective, as this will allow opportunities for regeneration and help to keep buildings in active uses.		
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### Summary

- The policy has the potential to have significantly positive impacts on the objectives relating to reducing the need to travel, improving access to services and improving health. The policy should result in new community facilities being located in areas with good sustainable transport links and close to where they are required, which will reduce need to travel and improve access. Delivery of new facilities, as well as protection of existing facilities will ensure there is adequate provision of a range of services, including health, helping to improve and increase access to services, as well as providing opportunities for community interaction, having health and social benefits.
- The policy also has the potential to have positive impacts on the objectives relating to heritage, air quality, best use of land, community safety, equalities and economic development. The policy could help to bring vacant or under-utilised buildings back into viable uses, potentially having heritage benefits as well as helping to make the best use of building stock. The policy should help to reduce the need to travel, having benefits for air quality. The delivery of community facilities provides the opportunity for community interaction which could help promote community safety, can help support delivery of services which meet the needs of people with protected characteristics, as well as providing opportunities for education which helps reduce deprivation. Finally, community facilities can provide opportunities for employment and can help to maintain vitality of neighbourhood centres depending on their location. The policy approach of allowing change of use could also have positive impacts on economic development through allowing opportunities for regeneration. Impacts on heritage and community safety are fairly uncertain.

### Recommendations

- There are no recommendations or requirements for mitigation.

### CPP2 Policy Appraisal: DM10 Public Houses

#### Options Stage – Community Facilities/Pubs

- Option 1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)
- Option 2) General policy to protect all community facilities (including pubs)



- Option 3) Specific policy to protect community facilities and additional specific policy to protect pubs

**This policy is considered to be linked to option 3**

**Assumptions**

- This policy deals with protection of existing pubs rather than development of new pubs.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+?	+?	+?	Pubs could be located within a listed building, or within a Conservation Area. Vacant premises can result in heritage assets being at risk of neglect or decay, and can erode the character of a Conservation Area. The main aim of the policy is to protect pubs and not allow change of use unless certain circumstances are met. If the pub was a vacant listed building, this could result in heritage assets being at greater risk of decay or neglect. However the policy is considered to have flexibility as sets out clear criteria where change of use/redevelopment would be allowed. If the site being redeveloped/change of use was a vacant listed building then the policy could have a positive impact on this objective by enabling heritage assets to be brought back into active use. This is also uncertain as depends upon the site and whether or not it has heritage value.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	Retention of pubs that are located in close proximity to the community it serves can help to reduce the need to travel. In addition, the policy will only allow loss of a pub where alternative provision is available locally, which also should help to reduce the need to travel. Impacts should be positive.	D	P
13. To make the best use of land available	+	+	+	The main aim of the policy is to protect pubs and not allow change of use unless certain circumstances are met. If the pub was a vacant building, this could result adverse impacts for this objective as would not be making the best use of sites available. However the policy is considered to have flexibility as sets out clear criteria where change of use/redevelopment would be allowed. If the site being redeveloped/change of use was a vacant building then the policy could have a positive impact on this objective by enabling an underused/vacant/derelict site	D	P

				to be brought back into active uses.		
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	Although the policy will not increase provision, the policy is considered to have a positive impact on this objective as will lead to the protection of pubs, enabling communities to meet their needs to access these facilities locally. In addition, where change of use is permitted, priority is for alternative community uses, which will also enable people to access other community-type services, and also only allows change of use where alternative provision is available locally, which helps to maintain access. The protection of pubs, or their alternative community use can help bring footfall to an area and help to ensure the ongoing vitality of the retail centres they are located within where relevant. Overall the policy should have significant positive impacts on this objective.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	The policy will lead to the protection of pubs, or will permit change of use to alternative community uses and will only permit change of use where it has been demonstrated that a local community no longer needs it. Pubs and community uses provide opportunities for social interaction which supports general well-being, and their protection will ensure ongoing access to these types of facilities. The availability of pubs and community uses also helps in the formation of balanced communities. Overall impacts should be significantly positive.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy will lead to the protection of pubs, or will permit change of use to alternative community uses. Pubs and community uses provide opportunities for social interaction which can have a positive effect on community safety. In addition, the ability to change the use, e.g. in the case of a derelict site where the site is brought back into active uses can also help to reduce the fear of crime.	I	P
18. To increase equality and social inclusion	+?	+?	+?	The policy will lead to the protection of pubs, or will permit change of use to alternative community uses and only where it has been demonstrated that a local community no longer needs the provision. Pubs and community uses can provide opportunities to meet the needs of people with protected characteristics however this is dependent on what service is provided and is therefore also fairly uncertain.	I	T
19. To contribute towards the growth of a sustainable and diverse economy, increase employment	+	+	+	Pubs provide employment opportunities and can provide a focal point in local centres, helping to maintain their vitality and footfall. The flexibility to allow change of use/redevelopment should also help with	D	P

opportunities and meet local employment needs.				regeneration opportunities, e.g. with vacant/redundant premises and although the policy will prioritise community uses, this does not preclude other non-community uses. Overall impacts should be positive.		
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### Summary

- The policy has the potential to have significantly positive impacts on the objectives relating to access to services and health. The policy will result in the protection of pubs, or provision of community facilities where change of use is allowed, and will only allow change of use where the local community no longer needs provision and there is alternative provision locally. This will help to maintain access to these services and can also help to contribute to increasing or maintaining the vitality of the wider area through footfall. The protection of pubs will ensure that there are ongoing opportunities for social and community interaction, supporting general well-being, as well as helping to ensure balanced communities.
- The policy has the potential to have positive impacts on the objectives relating to heritage, reducing the need to travel, making the best use of land, community safety, equalities and economic development. The policy could help to bring vacant sites back into viable uses, potentially having heritage benefits as well as helping to make the best use of existing building stock. The policy should help to protect pubs helping to reduce the need to travel to alternative premises. Pubs provide opportunities for social interaction, benefiting community safety, and where change of use is permitted, this could help to reduce the fear of crime if the site was previously derelict/vacant. Pubs can also provide a venue to deliver services for people with protected characteristics. Finally, pubs provide employment opportunities and can help to increase footfall to an area, having economic benefits. Impacts on heritage and equalities are also uncertain as will depend on the site and the services provided.

### Recommendations

- There are no recommendations or requirements for mitigation.

## Employment, Tourism and Retail

### CPP2 Policy Appraisal: DM11 New employment business floorspace

#### Options Stage

- Option 1) No detailed development management policy to guide new employment/ business floorspace instead rely on guidance set out in strategic allocations; Policy CP2 Sustainable Economic Development as well as generic guidance in NPPF and NPPG.
- Option 2) Detailed development management policy to guide proposals containing new employment/ business floorspace

This policy is considered to be linked to option 2

#### Assumptions

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of employment development, e.g. potential impacts on biodiversity etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/+?	-/+?	-/+?	<p>New development could potentially have adverse landscape impacts depending on the location and sensitivity of the surrounding landscape. Some of the existing protected industrial estates are located adjacent to the SDNP boundary, including Hollingbury Industrial Estate, Hyde Business Park and Woodingdean Business Park. The policy supports redevelopment on industrial estates and this may provide the opportunity to improve the appearance of buildings located within the setting of the SDNP. Redevelopment on these industrial estates is considered unlikely to result in any additional adverse landscape impacts over those already in existence due to the presence of existing industrial units.</p> <p><b>Mitigation:</b> Development within the setting of the SDNP is addressed through CPP1 policy SA5; in addition CP15 Urban Design and emerging CPP2 policies on design should ensure high quality design development is delivered. In</p>	I	P

				addition, the policy itself requires well designed high quality buildings, although this more relates to the internal design of the buildings.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	New employment development could increase the number of work-related journeys within the city. However, it could also help to reduce out-commuting and therefore reduce journeys made. The policy does not refer to development being located where sustainable journeys can be maximised. Many employment developments tend to be located within the core areas of the city which have good sustainable transport access, rather than within the more suburban neighbourhoods where sustainable transport options are not as frequent, and it is assumed that new employment development is more likely to come forward in these more central locations. The exception to this is the industrial estates, some of which are on the outer edges of the city. <b>Mitigation:</b> CPP1 Spatial Strategy directs the majority of development to areas within the city which benefit from existing sustainable transport provision. CP9 Sustainable Transport sets the strategy relating to promoting sustainable travel, and emerging CPP2 policies on travel should help to mitigate against adverse transport impacts.	I	P
6. To improve air and noise quality	-/+	-/+	-/+	See Objective 5 for possible transport impacts that may also affect air quality. The policy could have positive impacts with regards to noise quality, due to supporting text reference which refers to “ensuring good standards of insulation to mitigate any overspill from future alternative uses in the building”. This may help to prevent any noise nuisance which could arise from employment uses.  <b>Mitigation:</b> As Objective 5.	I	P
11. To improve soil quality	-?	-?	-?	Employment-based development, particular that in industrial-uses, could result in contamination of land depending on the type of activity. <b>Mitigation:</b> CPP1 policy CP8 expects development to reduce land pollution and emerging CPP2 policies on polluted sites and protection of the environment should address this issue.	I	P
12. To minimise and sustainably manage waste	+	+	+	It is noted that the policy refers to new employment floorspace in existing buildings (e.g. through change of use) which could help to make better use of existing buildings promoting resource efficiency, having positive impacts.	I	P

13. To make the best use of land available	++	++	++	The policy supports change of use, which could help to bring back vacant/under-utilised buildings back into active uses, which would make a good use of existing building stock. In addition, the policy should lead to higher density redevelopments, particularly on older industrial estates, which again would also help to make better use of the land available. The policy should also lead to delivery of developments that are well-designed and can deliver flexible types and sizes of space which can be sub-divided and re-configured in order to response to any future market changes. Again this would enable the best use of the space to be made at all times.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Employment-based development will increase employment opportunities. Access to employment is a wider determinant of health.	I	P
18. To increase equality and social inclusion	+	+	+	Employment-based development will increase employment opportunities. Access to employment opportunities could help to reduce social inequalities and reduce deprivation depending on take-up.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The policy should result in delivery of high quality, flexible B1a, B1b and B1c development which can meet a range of business needs. The policy should result in delivery of flexible accommodation that can respond to future changing markets, which may help to reduce vacancy rates and help to sustain economic development in the longer term. The policy should also result in higher quality and higher density industrial developments on protected industrial estates. All the policy requirements should therefore help to increase provision of a range of types of employment floorspace, supporting employment opportunities and contribute towards economic growth.	D	P

## Summary

- The policy has potential to have significantly positive impacts on the objectives relating to making the best use of land and economic development. The policy supports change of use, which could help to bring back vacant/under-utilised buildings back into active uses, should lead to higher density redevelopments, particularly on older industrial estates, and should lead to more flexible development that can be sub-divided and re-configured in order to respond to any future market changes. All of these requirements contribute towards making better use of buildings and land. The policy requirements should lead to delivery of high quality, flexible B1a, B1b and B1c units and higher density industrial units that are flexible to and suitable to meet a range of business needs, and respond to future changes in the market. Availability of a range of types of units that can meet a range of business needs will support economic growth.
- The policy also has potential to have positive impacts on the objectives relating to health and equalities. The policy should help facilitate employment opportunities. Employment is one of the wider determinants of health and access to employment may help to reduce employment based deprivation. The policy could also have positive impacts on waste as the policy supports change of use which would be a good use of existing resources and would help to reduce construction waste generation.
- The policy has potential to have mixed positive and negative impacts on the objectives relating to SDNP, travel, and air/noise quality. Some of the industrial estates are located adjacent to the SDNP boundary, and new development in these locations could provide the opportunity to improve buildings located within the setting, however could also have adverse landscape impacts. The policy could result in an increase in employment-based transport movements, having associated air quality impacts, although could help to reduce out-commuting with transport impacts being largely dependent on location of development. The supporting text reference to insulation may help to reduce the risk of any noise nuisance.
- The policy also has potential to have adverse impacts on soil quality. Some employment uses, particularly those located on industrial estates could result in land contamination.

## Recommendations

- There are no recommendations for changes to the policy. Mitigation for the potential adverse impacts arising from development are considered to be addressed through CPP1 policies: SA5 Setting of the SDNP, CP9 Sustainable Transport and through emerging CPP2 policies on Protection of the Environment and Health.

## CPP2 Policy Appraisal: DM12 Primary, Secondary and Local Centre Shopping Frontages

### Options Stage – options considered

- Option 1) No policy framework to guide new and appropriate uses within the Primary, Secondary and Local Shopping Frontages of the Regional, Town/District and Local Centres
- Option 2) Criteria based policy to assess changes of use within the Primary, Secondary and Local Shopping Frontages of the Regional, Town/District and Local Centres
- Option 3) Have a single policy to assess changes of use for all retail areas.

The policy is considered to be linked to option 2.

### Assumptions

- Policy applies to change of use only and does not deal with new-build development.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Some of the defined retail centres are situated within Conservation Areas and some of the buildings within the centres and in retail uses are listed. The main objective of the policy is to retain of a certain amount of A1 uses in the centres. The policy allows change of use provided certain criteria are met, and this may help to reduce vacancy. Vacant units within Conservation Areas or within Listed Buildings could result in neglect of heritage assets or could have an adverse impact on the character of Conservation Area if the shops form part of its character. Therefore the policy could have an indirect positive impact on this objective through potentially reducing risk of vacancy or neglect.	I	T
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	Town, District and Local Centres are important in enabling local communities to meet their daily needs. The policy allows for a greater proportion of units to change use from A1 in these areas, than when compared to the Regional Centre, which reflects the need for these centres to have a wider offer that is more appropriate when serving a local area. Having a balanced mix of uses in	I	P



				these locations will enable people to meet their needs locally, helping to reduce the need to travel. Therefore the policy could have an indirect positive impact on this objective.		
6. To improve air and noise quality	+	+	+	The policy could help people to meet their needs locally and reduce the need to travel, which can contribute towards maintaining/improving air quality. Overall impacts are considered to be positive.	I	P
13. To make the best use of land available	-/+	-/+	-/+	The policy will result in some changes of use being prevented and this could result in some vacancies, albeit these are likely to be on a temporary basis. In particular the policy for Local Centres requires evidence to be submitted to demonstrate the use is no longer viable (such as 12 months marketing) and this is likely to result in more lengthy vacancies (e.g. 12 months). This would not be making the best use of land available in the city. However, the policy should also result in a balanced mix of uses across all retail centres, and this would help to achieve the aims of this objective. Overall impacts are considered to be mixed. <b>Mitigation</b> Not required as vacancy would be for a temporary basis.		T/P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The policy does not allow change of use to a residential use at ground floor level within any of the defined retail centres. Although this could have an adverse effect on housing provision, the combined extent of all the defined retail centres is only small in comparison with the developable area of the city. In addition, the policy requirements would still allow residential to be provided on upper levels.	D	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	The policy should ensure that a balanced mix of uses, including predominantly A1 uses which includes convenience stores and chemists, as well as allows other A uses e.g. professional services such as estate agents, cafes and takeaways in all retail centres, with the mix in accordance with the type of retail centre, e.g. a lower mix of uses in the primary frontage of the Regional Centre, but allowing a greater mix within Local Centres. The policy for Town, District and Local Centres, will help to ensure local communities can meet their day to day needs locally, and also permits some D1 community uses which will help improve access to these services. The policy is considered to have significant positive impacts for accessing services and this objective.	D	P

16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should ensure that a balanced mix of uses, including predominantly A1 uses, are retained in various retail centres. This is of particular importance in Town, District and Local Centres, where local communities are likely to shop for food. Access to food, particularly fresh food, is a key contributor towards healthy lifestyles and evidence shows that diet and diet related health problems are more prevalent in areas where there is limited access to food. In addition, the policy allows some D uses in Town, District and Local Centres, which would support this objective by facilitating access to health. The policy should therefore have a positive impact on this objective.	I	P
17. To improve community safety, and reduce crime and fear of crime	-/+	-/+	-/+	The policy should ensure that a balanced mix of uses are retained within the retail centres and allows a certain amount of change of use, in accordance with the type of centre. Having a range and mix of uses can help to bring people to retail centres for various purposes, and this itself can help to reduce crime and the fear of crime, through passive surveillance and activity. It is noted that the policy for Local Centres requires evidence to support the change in use, and this may result in some periods of vacancy in these locations, albeit on a temporary basis. Vacant and boarded up shops fronts can increase the fear of crime and this may therefore have adverse impacts on this objective. Overall impacts are therefore considered to be mixed. <b>Mitigation</b> Not required as vacancy would be for a temporary basis.	I	T/P
18. To increase equality and social inclusion	+	+	+	Being able to access services locally is of particular importance for those who may not be able to travel further afield, e.g. disabled people, older people and young people. The policy on Local Centres should ensure that a balanced mix of uses are retained in these centres, which should help people meet certain needs locally. This will have positive impacts on this objective.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The policy should help maintain a balanced mix of uses within all retail centres, that is appropriate to the type of centre and help to maintain vibrancy, footfall and economic activity. Brighton is the regional shopping centre for the wider area, provided largely by the Regional Centre and the retail economy is a significant part to the overall economy. It is imperative that the Regional Centre continues to provide a high proportion of A1 uses in	D	P

				order to maintain this status and attract visitors, and the policy reflects this and will enable change of use to be managed in accordance with this status. The policy will also enable other centres to offer a wider mix of A uses in order to continue to meet community needs and also help to maintain activity and vibrancy in these centres. The policy should have significant positive impacts on this objective.		
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**Overall summary**

- The policy could have significant positive impacts for the objectives for access to service and economic development. The policy should ensure there is a balanced mix of uses in all retail parades and recognises the importance of the Regional Centre and the need to provide a greater proportion of A1 uses in this centre. The policy will enable communities to meet their various needs within their local area, and should ensure the ongoing vibrancy, vitality and activity within all centres, having economic benefits.
- The policy could have positive impacts for the objectives for heritage, reducing the need to travel, air quality, health and equalities. The policy may help to prevent vacancy in certain centres, by allowing change of use, and this could be of heritage benefit where premises are located within listed buildings or conservation areas. The policy will help to ensure a balanced mix of uses and may reduce the need to travel further to access these services, also having air quality benefits. The policy will ensure a certain amount of A1 uses remain in all centres, with this providing opportunities to access food locally, having health benefits, and also supports change to some D uses which may increase access to health. By ensuring a balanced mix of uses, particularly in local centres, will benefit those who may not be able to travel further, e.g. disabled people, older and young people, having equalities benefits.
- The policy could have mixed positive and negative impacts for the objectives for making the best use of land and community safety. The policy may lead to temporary vacant premises particularly in local centres, which may not be making the best use of land available, and may increase the fear of crime or anti-social behaviour. However, the policy should also ensure an appropriate balance of mixes and reduce the risk of a predominance of any one type of use, which is making a good use of land; and should help to ensure centres remain vibrant, active, continuing to attract users and ensure footfall, which will support community safety through passive surveillance and activity.
- The policy was found to have no impacts on housing delivery, as although the policy does not allow change of use to residential at ground floor level, the combined extent of the retail areas is considered to be limited when compared to the developable area of the city.

**Recommendations and Mitigation**

- The policy for Local Centres, whereby any application for change of use must be able to prove the use is no longer economically viability, would result in units being vacant for over 12 months. Vacancy and boarded up units could increase the fear of crime or promote anti-social behaviour and may not be making the best use of land available. However it is recognised that this would be for a temporary period, and therefore no recommendations or requirements for mitigation are suggested in relation to this.

**CPP2 Policy Appraisal: DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units**

**Options Stage**

- Option 1) No policy framework to guide new and appropriate uses within ILPs, Neighbourhood Parades or individual shop units
- Option 2) Criteria based policy to assess changes of use within ILPs, Neighbourhood Parades or individual shop units
- Option 3) Have a single policy in CPP2 covering all retail areas

**This policy is considered to be linked to option 2**

**Assumptions**

- This policy deals with changes of use only.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city’s historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Some of the Important Local Parades are situated within Conservation Areas, including Goldstone Villas and Victoria Terrace. In addition, some of the buildings on Victoria Terrace are listed. The main thrust of the policy is to ensure the ongoing functionality of the parade, including retention of a certain amount of A1 uses in the parade. The policy allows change of use provided certain criteria are met, and this may help to reduce vacancy. Vacant units within Conservation Areas or within Listed Buildings could result in neglect of heritage assets or could have an adverse impact on the character of Conservation Area if the shops form part of its character. Therefore the policy could have an indirect positive impact on this objective.	I	T
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	Important Local Parades and Neighbourhood Parades are generally located within residential areas and are an important source of retail and service provision which serve their locality. Having these shops and services within easy walking distance can help meet residents’ day to day needs locally, and can help to reduce the need to travel further afield which may be by less sustainable mode of travel. The policy on Neighbourhood Parades in	D	P

				particular only allows change of use from A1 if there is similar provision within 300m, which is considered to be around a 5 minute walk-time. The policy is considered to have positive impacts on this objective.		
6. To improve air and noise quality	+	+	+	As described under objective 5, the policy should help residents meet some of their day to day needs within their local area, and this can help reduce the need to travel by car. This could therefore contribute towards maintaining air quality in areas where it is already good, and contributes to a reduction in air pollutants being emitted in general.	I	P
13. To make the best use of land available	+	+	+	The policy should result in a balanced mix of uses which would help to make the best use of the building stock. In addition, it allows change of use provided certain criteria are met and this could help to reduce vacancy, again making the most of the building stock.	I	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	The policy should ensure that a balanced mix of uses, including predominantly A1 uses which includes convenience stores and chemists, as well as other A uses e.g. professional services such as estate agents, cafes and takeaways are retained in Important Local Parades. This will help to ensure local communities can meet their day to day needs locally, without the need to travel further afield. The policy on Neighbourhood Parades in particular only allows change of use from A1 retail units if there is similar provision within 300m, which is considered to be a 5 minute walk-time. The policy should have significant positive impacts towards achieving this objective.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should ensure that a balanced mix of uses, including predominantly A1 uses, are retained in Important Local Parades and Neighbourhood Parades. Access to food, particularly fresh food, is a key contributor towards healthy lifestyles and evidence shows that diet and diet related health problems are more prevalent in areas where there is limited access to food. The policy should therefore have a positive impact on this objective.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy seeks to ensure that a balanced mix of uses are retained in ILPs. Having a range and mix of uses can help to bring people to a parade, and this itself can help to reduce crime and the fear of crime, through passive surveillance. In addition, the policy allows change of use which may help to reduce vacancy. The policy should therefore have a positive impact on this	I	P

				objective.		
18. To increase equality and social inclusion	+	+	+	The policy should ensure that a balanced mix of uses are retained in Important Local Parades and Neighbourhood Parades. This will help to ensure local communities can meet their day to day needs locally, without the need to travel further afield. The policy on Neighbourhood Parades in particular only allows loss of A1 retail units if there is similar provision within 300m, which is considered to be a 5 minute walk-time. The policy is considered to contribute towards this objective as may help to ensure the needs of older people, who may be less able to travel further, as well as disabled people and young people, can access some services within their local area.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy seeks to ensure that a balanced mix of uses are retained in Important Local Parades and Neighbourhood Parades. This can help to maintain the vitality and vibrancy of the parades, and helps to bring footfall having economic benefits. The policy also allows change of use in some circumstances, which should help to prevent long-term vacancy and also adds to ensuring the vibrancy of a parade. Overall impacts should be positive.	D	P

### Overall Summary

- The policy should have significant positive impacts on the objectives for access to services. The policy should ensure there is a balanced mix of uses in local parades which will enable communities to meet their various day to day needs within their local area.
- The policy should have positive impacts on the objectives for heritage, reducing the need to travel, air quality, best use of land, health, community safety, equalities and economic development. The policy could help to reduce vacancy through allowing change of use, and this could help contribute towards enhancing or improving heritage assets where relevant. It should ensure that communities can meet some needs locally, thus reducing the need to travel for some journeys, also having benefits for air quality. It contributes towards making the best use of premises, by preventing over concentration or under provision of certain uses and also allows changes of use which should help to reduce vacancy. The policy should help to ensure that communities have local access to food, having benefits for health and also that parades continue to serve their local area, particularly benefiting people who may not be able to travel farther afield, such as older people and disabled people. Through supporting a balanced mix of uses, the parades should continue to attract people, thus helping to reduce the fear of crime and also promoting economic activity in the area.

- The policy was found to have no impacts on housing delivery, as although the policy does not allow change of use to residential at ground floor level, the combined extent of the Important Local Parades is considered to be limited when compared to the developable area of the city where housing development would be permitted .

### Recommendations and mitigation

- There are no further recommendations or requirements for mitigation.

### CPP2 Policy Appraisal: DM14 Special Retail Area – Brighton Marina

#### Options Stage

- Option 1) No policy framework to guide new and appropriate uses (*including change of uses*) within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1) but rely on NPPF and high level policies CP4 (Retail Provision) and DA2 ( Brighton Marina, the Gas Works and Black Rock Area)
- Option 2) Criteria based policies to assess changes of use within Brighton Marina (Brighton Marina Inner Harbour as defined by policy DA2 of CPP1)
- Option 3) Have a single general policy in CPP2 covering retail frontage and changes of use

#### Assumptions

- Policy applies to change of use only and does not deal with new-build development.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	It is recognised that the Marina is currently a destination for leisure, recreation and retail purposes. The policy allows change of use from A1 to A2, A3, launderettes and some D1 uses (such as doctors and dentists) and could therefore lead to a more balanced mix of uses and services that would be traditionally located within e.g. a local/town/district centre location to serve a local resident population. This will become increasingly important as the	I	P

				planned developments of the Marina are built out, will help support the local population's needs and potentially reduce the need to travel to access these types of services. Impacts should therefore be positive.		
13. To make the best use of land available	+	+	+	The policy helps to define the mix of uses that would be acceptable at the Marina and may help to prevent a predominance of any one kind of use. It may help to prevent vacancy by allowing change of use. This would have positive impacts for this objective as would help to create a balanced mix of uses and would help to make the best use of premises available.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The policy clearly specifies that change of use to residential at ground floor level will not be permitted within the retail frontage, however this is in order to protect the retail frontage and is not considered to have an adverse impact for this objective.		
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	The policy has the potential for significant positive impacts for this objective as helps to define the mix of uses that would be acceptable at the Marina and may prevent a predominance of any one kind of use. The types of uses that would be permitted include those more traditionally found in a local/district/town centre, including D1 doctors and dentists as well as A2 services. This should help to ensure that people's day to day needs can be met locally, which will become increasingly important in the future as the anticipated quantum of housing is delivered.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy allows change of use to D1 uses, including health services such as doctors or dentists. This may help improve access to health for local residents and would have positive impacts on this objective.	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy allows change of use provided that the proposed use would improve the viability and vitality of the Marina shopping area. This may help to increase footfall which can have positive impacts on community safety.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The policy has the potential for significant positive impacts for this objective. It should help lead to a more balanced mix of uses within the Marina area, should help to increase footfall to the area and should help improve the viability of existing providers, all having economic benefits.	D	P



## Overall Summary

- The policy has potential for significant positive impacts on the objectives for improving range and access to services and economic development. The policy allows change of use to other uses that may be more traditionally located within local retail centres, such as A2 services and D1 doctors. This will help to increase the range of uses and services available within the Marina leading to a more balanced mix which will become increasingly important as the resident population increases. The policy may also help to increase footfall to the area and viability of existing providers, having economic benefits.
- The policy also has the potential for positive impacts on the objectives for transport, making the best use of land, improving health and improving community safety. The policy should lead to a wider range of local services which can help to reduce the need to travel for the local population; should result in a more balanced mix of uses and may help to reduce the risk of vacancy helping to make the best use of land; may improve access to health services such as doctors and dentists; and may help to increase footfall and pedestrian activity, supporting community safety.

## Recommendations and Mitigation

- There are no recommendations for changes or requirements for mitigation

## CPP2 Policy Appraisal: DM15 Special Retail Areas – The Seafront

### Options Stage

- Option 1) No policy framework to guide new and appropriate uses (*including change of uses*) within seafront but rely on NPPF and high level policies CP4 (Retail Provision) and SA1 The Seafront in CPP1
- Option 2) Criteria based policies to assess changes of use within seafront
- Option 3) Have a single general policy in CPP2 covering retail frontage and changes of use

### Assumptions

- This SA assessment only assesses the direct contents of this policy.
- Assume that the general potential impacts of development along the seafront, e.g. potential impacts on resource use etc, will be addressed, and all other requirements, e.g. standards of CP8, will be achieved, resulting in no impacts on those relative objectives. However, any specific site constraints are considered where relevant.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)

1. To protect, conserve and achieve a net gain in biodiversity	-	-	-	The policy supports new retail and some other forms of development within the seafront area (SA1), specifically the lower promenade, Madeira Drive and within the seafront arches. The Volk's Railway SNCI covers some of the shingle beach adjacent to Madeira Drive. Development in this location could therefore have potential for direct adverse impacts on this SNCI, as well as indirect impacts through the potential for the policy to increase footfall in this location, adding to recreational pressure on the SNCI. Mitigation: Mitigation would be provided by implementation of CPP1 Cp10 Biodiversity and emerging CPP2 policy Green Infrastructure and Nature Conservation	D/I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The policy supports new sport or leisure proposals within the seafront. This should have positive impacts on this objective as may result in increased provision and access to outdoor sports facilities.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The seafront is covered by a number of Conservation Areas from the Sackville Gardens CA in the west to the Kemp Town CA in the east. Numerous listed buildings and their settings are also found in this location. The policy includes a specific requirement relating to the historic character of the seafront which requires the scale and design of any development in this location to complement the surrounding heritage assets. This should help to integrate new development into the historic environment and respect the built heritage.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	-	-	New retail/D use development along the seafront could increase the attractiveness of the seafront as a destination. There is good access to the seafront from central Brighton, and therefore good access by existing bus or train, although there is no seafront bus route to the west of the Pier. There is limited parking along the actual seafront, with some availability along Madeira Drive and Marine Parade, which is already well-used at all times of the year. Kingsway and Madeira Drive both already suffer from congestion. Parking destinations for seafront users tend to be the Churchill Square and Regency Square car-parks which already suffer from congestion. The policy could therefore result in increased transport movements and may add to existing congestion issues. Mitigation: Provided by CP9 Sustainable Transport that seeks to promote	I	P

				sustainable travel choice. CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised.		
6. To improve air and noise quality	-/+	-/+	-/+	Kingsway in its entirety is located within the AQMA. New retail/D use development along the seafront could increase the attractiveness of the seafront as a destination and could result in increased transport movements, having air quality impacts. The policy requires development to ensure it does not result in harmful noise impacts on residents and visitors and this should have positive impacts for noise quality.	I/D	P
8. To reduce the risk from all sources of flooding to and from development	+	+	+	Although situated alongside the seafront the lower promenade, seafront arches and Madeira Drive are all located within Floodzone 1. Therefore development in this location is not considered to be at risk from tidal flooding and therefore has a positive impact on this objective by directing development to areas of lower risk of flooding. In addition, these types of uses are considered to be less vulnerable.		
13. To make the best use of land available	+	+	+	The policy supports proposals for new development as well as change of use, which can help reduce vacancy and can help to make the best use of existing building stock. The policy also provides encouragement for temporary uses, e.g. pop-up shops, which can also help to make use of vacant premises in between leases or before/during construction stages when premises may be more difficult to let. Overall, impacts should be positive.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy supports proposals for a range of A and D uses along the seafront provided that applications complement existing uses. The policy should therefore help to increase provision of these uses. In addition, the support for interim uses can help to support the vitality of the area, particularly during times of construction. Overall impacts should be positive.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The seafront is an important destination for leisure and recreation purposes, and allows access to various sea-based activities, as well as sports that are located on the seafront such as beach volleyball. The policy supports proposals which complement these existing uses and could therefore have benefits for health. The policy also recognises that there could be adverse impacts on amenity resulting from seafront development, and seeks to	I	P

				ensure that there are no harmful impacts on amenity for local residents and visitors, also having positive impacts on health.		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy seeks to support proposals which extend footfall and reduce seasonality. This may help to improve community safety along the seafront and positive impacts on this objective.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The seafront is a key destination for visitors and the money brought into the city by tourism makes up a significant part of the economy. The policy supports proposals for new A and some D uses along the seafront as well as provides encouragement for temporary uses. This should help increase these types of development, help to increase footfall along the seafront, contribute towards the regeneration of the seafront, and help to ensure that the seafront remains an attractive destination to visitors and residents, all having wider economic benefits. Impacts should be significantly positive.	D	P

#### Overall summary

- The policy has potential to have significant positive impacts on the objective for economic development. The policy should support the enhancement and further regeneration of the seafront, should help to increase footfall and help to ensure the seafront remains an attractive destination having benefits for the economy.
- The policy has potential to have positive impacts on the objectives for open space, heritage assets, reducing flood risk, making the best use of land, improving the range of services, improving health, and improving community safety. The policy supports new sport or leisure proposals within the seafront, having benefits for outdoor sports provision. The policy should help to integrate new development into the historic environment and respect the surrounding built heritage. The policy directs development to areas of lower flood risk and encourages less vulnerable uses in this location. The policy supports changes of use and encourages temporary uses, helping to make the best use of land and premises and increasing provision of various uses. The policy supports proposals that complement existing sports and leisure uses and may help to increase awareness of existing sports uses, having health benefits, and may help to improve community safety through increasing footfall and seasonality across less visited areas of the seafront.
- The policy has potential for adverse impacts on the objective for biodiversity, transport and air/noise quality. Development could directly impact upon the Volk's Railways SNCI, as well as indirectly through increased recreational pressure. Development could increase journeys made to the seafront by less sustainable forms of transport, adding to congestion and other transport-related impacts. Impacts for the air/noise quality objectives are considered to be mixed, due to the policy requirements for developments to consider noise amenity impacts.

#### Recommendations and mitigation

- There are no recommendations for changes to the policy. Mitigation should be provided by emerging CPP2 policy on Green Infrastructure and Nature Conservation and CPP1 CP9 Sustainable Transport, and CPP2 DM33 which requires development to encourage travel by sustainable means and DM35 which requires development to ensure journeys by car are minimised.

## CPP2 Policy Appraisal: DM16 Markets

### Options Stage – Permanent Markets

- 1) No policy framework to assess permanent market applications
- 2) Criteria based policy to assess new permanent markets or extensions to existing markets with no preferred sites identified
- 3) Pro-active policy with appropriate permanent market sites identified

**This policy is considered to be linked mainly to option 2. However as the policy specifies that new or expanded markets should be located within the defined shopping centres, this provides some guidance with regards to location and is therefore considered to be linked in part to option 3.**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-/+	-/+	-/+	<p>Some of the defined shopping centres are located within Conservation Areas including Brighton Regional Centre, Hove Town Centre and Rottingdean Local Centre. There are also numerous Listed Buildings located within some of the retail centres. New market development could therefore have an adverse impact on these heritage assets and would largely be dependent on design, siting and scale.</p> <p>However, a market development could have a positive impact on heritages assets, for instance if it helped to bring a vacant listed back into active use. Overall impacts are considered to be mixed and would be dependent on what was delivered and the location.</p> <p><b>Mitigation:</b> CPP1 Policy CP15 Heritage and emerging CPP2 policies that provide policy on protecting heritage assets and their settings, and policy on design should provide mitigation and ensure either a neutral or positive</p>	I	P

				impact is achieved.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	<p>The policy specifies that new or expanded markets should be located within one the defined shopping centres. All of these centres already have good existing sustainable transport links, which in itself would help sustainable travel to these facilities.</p> <p>In addition, the policy specifies that only allow market development will be allowed if it does not have an adverse impact on highway safety, parking and traffic flow.</p> <p>Additionally, markets generally, but not always, serve the local population, and therefore may help prevent people from having to travel further afield to access this type of facility.</p> <p>Impacts should be positive.</p>	D	P
6. To improve air and noise quality	+	+	+	<p>Although some of the shopping centres are located within the AQMA, the policy requirements for new or expanded markets to be located within defined shopping centres where existing access by sustainable transport is good, as well as policy requirements which will not allow development if it has adverse impacts on traffic flow should result in positive impacts for this objective.</p> <p>By locating markets in existing shopping centres, where there is already residual noise, any potential for noise nuisance should also be minimised.</p>	I	P
13. To make the best use of land available	?	?	?	Market development could help to regenerate derelict sites or areas, however this is fairly uncertain and will depend on the site.	I	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	Market development would increase the retail offer available in a location. Markets will be located within existing shopping centres where sustainable transport provision is already good, and this will support accessibility. Impacts considered to be significantly positive on this objective.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>Permanent markets would increase the range of retail offer in an area, including food, and would therefore have a positive effect on this objective through improving access to food.</p> <p>Markets also provide the opportunity for community interaction which can have a positive effect on health.</p>	D	P
17. To improve community safety, and reduce crime and fear of crime	?	?	?	Markets provide the opportunity for community interaction. This may help to improve community safety although is fairly uncertain.	I	P

19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	Markets can have various benefits for economic development. They can act as a catalyst to draw services into an area, can help to regenerate areas and can increase footfall to an area, all of which would have economic benefits. Markets can also provide employment opportunities. Impacts considered to be significantly positive.	D	P
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### Summary

- The policy has the potential for positive impacts for the objectives relating to travel, air quality, access, health and economic development. New market development will be located within the defined retail areas where sustainable access is already good. This should help reduce the need to travel by car and supports accessibility. In addition, the policy will not allow development if it will have adverse transport impacts. Markets can help increase access to food, as well as provide an opportunity for social interaction, having health benefits. Markets can have numerous economic benefits including helping to regenerate areas, increasing footfall, and providing opportunities for employment. Impacts on access and economic development are considered to be significantly positive.
- The policy has potential for mixed impacts on the heritage objective. Markets could have a positive impacts on heritage assets, e.g. through bringing vacant buildings back into active uses; however could have adverse impacts, e.g. through poor design.
- The policy requirement for market development to be located within the defined shopping centres helps to clarify that there will be no impacts on certain site based objectives, including biodiversity, open space and the SDNP.

### Recommendations

- There are no recommendations. Mitigation for the potential adverse impacts arising from development is considered to be provided by either existing adopted policy or will be addressed through emerging CPP2 policy.

## CPP2 Policy Appraisal: DM17 Opportunity Areas for New Hotels and Safeguarding Conference Facilities

### Options Stage

- Option 1) No additional policy to manage visitor accommodation in the city and no further hotel site allocations; no reduction in Hotel Core Zone; no reference to safeguarding large scale conference and banqueting facilities within existing Hotels. (E.g. CPP1 CP6 only).
- Option 2) Identify sites suitable for hotels to meet the high growth forecast demand for new hotels over the plan period; amend Hotel Core Zone and include policy provision safeguarding large scale conference and banqueting facilities within existing Hotels and include reference to short term lets in the Retaining Housing policy

- Option 3) Additional policy identifying opportunity areas for search for new hotels guided by low growth forecast; update Hotel Core Zone; include policy provision in CPP2 to safeguard large scale conference and banqueting facilities within existing Hotels and reference to short term lets in the Retaining Housing policy

**Policy considered to be reflective of option 3 and identifies the 5 following areas within existing strategic allocations as suitable search areas:**

1. DA1.B.1 New Brighton Centre and Expansion of Churchill Square
2. DA2.C.1 Brighton Inner Harbour
3. DA2.C.3 Black Rock Site
4. DA4.C.1 New England Street Area
5. DA6 Hove Station Area

#### **Assumptions**

- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts relating to the areas of opportunity, however assumes generic impacts arising from development would be addressed (e.g. increased resource use) by adopted policy.

<b>SA Objective</b>	<b>Short-term</b>	<b>Med-term</b>	<b>Long-term</b>	<b>Summary of Effects</b>	<b>Dir/Ind (D/I)</b>	<b>Temp/Perm (T/P)</b>
1. To protect, conserve and achieve a net gain in biodiversity	-	-	-	The policy does not contain any additional requirements relating to biodiversity. None of the search areas contain biodiversity designations within them, although those within DA2 and DA4 are adjacent to SNCIs and an SSSI (although designated more for its geological interest). Any type of development could therefore impact upon these designated sites. Mitigation: CPP1 CP10 would apply as well as DA policies and emerging CPP2 policies which should ensure development results in net gains in biodiversity.	I	T
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	The policy does not contain any additional requirements with regards to SDNP. The Inner Harbour and Black Rock search areas are in fairly close proximity to the SDNP. However hotel development in these locations is considered unlikely to have adverse impacts on the SDNP, due to their situation within an		



				existing urban context and existing surrounding development.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-	-	-	The policy does not contain any additional requirements relating to heritage assets. None of the search areas contain any heritage designations within them, although those within DA1, DA2 and DA6 are immediately adjacent to Conservation Areas, and DA2 is also immediately adjacent to the Kemp Town Historic Park and Garden. Development could therefore impact upon these designations Mitigation: CPP1 CP15 would apply as well as DA policies and emerging CPP2 policies which should ensure development does not have adverse impacts on heritage assets and enhances them where possible.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	The policy does not contain any additional requirements relating to transport. Some search areas have good access to both bus and rail services; the DA2 sites only have good access to bus services. Access to sustainable transport could help influence travel choice and should help to reduce the need to travel by car.	I	P
6. To improve air and noise quality	+	+	+	The policy does not contain any additional requirements relating to transport or air quality. The DA1 and DA4 sites are located within the AQMA. However the proximity of these sites to various forms of sustainable transport should help to reduce the risk of hotel development worsening air quality within the AQMA.	I	P
7. To improve water quality (ecological, chemical and quantity status)	-/0	-/0	-/0	The policy does not contain any additional requirements relating to water quality. DA6 is located within GSPZ2 and could therefore have adverse impacts upon water quality. None of the other search areas are located within a GSPZ and would therefore have no impacts. Mitigation: CPP1 CP8 and emerging CPP2 policy on protecting the water environment should ensure no adverse impacts occur.	I	T
8. To reduce the risk from all sources of flooding to and from development	-	-	-	The policy does not contain any additional requirements relating to flood risk. All of the search areas have some risk of surface water flooding. DA2 Inner Harbour also has a risk of tidal flooding and is located within flood zone 3. Mitigation: CPP1 CP11 and emerging policy on sustainable urban drainage should ensure	I	P

				new development reduces the risk of flooding.		
11. To improve soil quality	?	?	?	Some of the search areas could have potential for contamination based on former uses. Emerging CPP2 policy on polluted sites should result in remediation and improved soil quality.	I	P
12. To minimise and sustainably manage waste	-	-	-	Some of the search areas include vacant/derelict sites, although most already include some buildings that would need to be demolished. Hotel development on these sites will result in production of demolition waste. Mitigation: WMLP policies would apply including those that manage construction and demolition waste.	I	P
13. To make the best use of land available	+	+	+	Some of the search areas are currently derelict sites (e.g. Black Rock) and therefore this policy could help to bring forward development on these under-used sites and help make better use of them. The other search areas contain sites and buildings which could be remodelled/redeveloped to intensify the use of the land in these locations, which would also help to make better use of the land.	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Some of the search areas are currently undeveloped/derelict sites and therefore new development could help increase active uses and increase passive surveillance, supporting community safety. Some of the search areas are within areas of high crime deprivation, however CPP1 policy CP12 should ensure that development incorporates features that design out crime.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The tourism sector is a significant contributor to the local economy, with it estimated that almost £7million was spent by visitors in 2011. The policy identifies 5 search areas within existing CPP1 strategic allocations whereby hotel development would be supported and this may help to bring forward new hotel developments. The policy therefore responds to background studies that indicate that new hotel development is not coming forward and in order to remain competitive, Brighton needs to attract new hotel products and markets. The policy also safeguards existing large conference and banqueting facilities, which also contribute to the local economy. Policy should therefore have significant positive effects on this objective. The policy is clear that any hotel development must not compromise the ability		

				for the other quantum of development to be delivered within the strategic allocations, which should help support economic growth in other sectors, e.g. through ensuring that new employment land or house-building takes place.		
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## Overall summary

- The policy was found to have significant positive impacts for the economic development objective as the policy may help to bring forward new hotel development within the search areas, enabling the city to meet the accommodation needs of tourists, potentially attract new markets and contribute towards increasing the visitor economy and remaining competitive. The policy should also safeguard existing conference facilities which is also a significant contributor to economic development locally. The policy should also ensure that the other requirements of DA policies can be achieved, e.g. delivery of employment land, also supporting economic growth.
- The policy was found to have potential for positive impacts for making the best use of land, as may help to bring forward development on derelict sites, or may help to intensify land-use within the strategic allocations, particularly as the policy still requires all other DA requirements to be delivered; and for community safety objective, as could help to increase activity and passive surveillance within the areas.
- The policy was also found to have potential for positive impacts for some of the site-based objectives including transport and air/quality, due to good access to existing sustainable transport.
- The policy was found to have potential for adverse impacts for some of the site-based objectives due to designations or issues within or adjacent to some of the areas of opportunity including biodiversity, heritage, water quality, and flood risk.
- Impacts were uncertain for soil quality, as it is unknown whether the search areas have potential for contamination.

## Mitigation

- Impacts upon biodiversity including adjacent designated sites, mitigated through CPP1 CP10 and emerging CPP2 policies on the natural environment.
- Impacts upon adjacent heritage assets, mitigated through CPP1 CP15 and emerging CPP2 policies on heritage assets.
- Impacts upon water quality, mitigated through CPP1 CP8 and emerging CPP2 policy on protecting the water environment.
- Potential to increase the risk of flooding or vulnerability to flooding if located in areas of high flood risk, also impacting upon climate change adaptation, mitigated through CPP1 CP8, CP10, CP11 and emerging CPP2 policy on urban drainage.
- Production of construction and demolition waste, mitigated through WMLP policies.
- If sites are found to be contaminated, emerging CPP2 policy on polluted sites should result in improvements to soil quality.

## Recommendations

- No recommended changes to policy

## Design & Heritage

### CPP2 Policy Appraisal: DM18 High Quality Design and Places

#### Options Stage

- Option 1) No specific, criteria-based policy to assess quality of design and making places better for people in the City Plan, in particular at street level (rely on CP12 and CP13)
- Option 2) Progress Local Plan Policy QD1 and bring together guidance on place making into city-wide criteria-based policy
- Option 3) Place making issues incorporated into other policies, including those for allocated sites/development areas

**This policy is considered to be linked to Option 2.**

**Assume any indirect impacts arising from development are addressed through other policy (e.g. increased resource use).**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The policy should help to ensure any public spaces around buildings have a purpose and function and link in with the wider public realm. Delivery of open space and public spaces including consideration of how these link into the wider public realm are an important part of creating a development that works well, looks good and integrates into the city. Impacts should be positive.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The policy should result in a high standard of design and requires development to consider local context. This will include consideration of the SDNP for development that is considered to be within the setting when relevant. This should result in positive impacts for this objective.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy should result in a high standard of design and requires development to contribute positively towards developing a sense of place. This should have positive impacts on this objective by supporting the creation of distinctive streetscapes and townscapes. The policy also requires development to consider local context. This will include consideration of heritage assets where relevant. In addition the policy requires consideration of scale and shape of buildings, as well as materials and architectural detailing	D	P

				which should also have positive impacts on surrounding streetscape, including heritage assets. Overall, impacts should be significantly positive for this objective.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	The policy requires development to consider access and links when designing spaces between and around buildings. This could help facilitate movement to the development and have a positive impact on this objective.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should result in well-designed developments and places across the city. Well-designed places can contribute significantly to health, through providing a visually attractive environment, supporting mental well-being, and also through the consideration of issues such as navigation through and to a development, which can help to facilitate more active lifestyles.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy requires development to address various considerations when designing the spaces between and around buildings. This includes the purpose, use, and comfort of the space, as well as access and links to the space. Well-designed and attractive spaces that have a function can help to ensure the spaces are utilised, and this can have benefits for this objective through providing opportunities for social interaction and helping to design out crime.	I	P

## Summary

- The policy has potential for significant positive impacts for the objectives relating to heritage and townscape. The policy should result in well-designed developments that contribute towards providing attractive streetscapes and townscapes, and that consider local context, including heritage assets.
- The policy has potential for positive impacts for the objectives for open space, SDNP, reducing the need to travel, health and community safety. The policy should help to result in open/public spaces that link in with the wider public realm, facilitating access to and between different sites; should result in well-designed developments that consider local context, including the SDNP where relevant; should support delivery of visually attractive developments that can promote well-being, as well as those which facilitate access which can help support healthy lifestyles; and delivery of spaces that have a purpose and provide opportunities for social interaction which can help to design out crime and support community safety.

## Recommendations and mitigation

- There are no further recommendations or requirements for mitigation.

### CPP2 Policy Appraisal: DM19 Maximising Development Potential

#### Options Stage

- Option 1) No specific policy framework to ensure that new development maximises site potential and avoids the under-development of housing sites in the City Plan Part Two (rely on existing policy guidance – NPPF, NPPG and CPP1 policies or combination of other CPP2 policies)
- Option 2) Introduce into CPP2 a city-wide, criteria-based policy
- Option 3) Incorporate criteria into another CPP2 policy

#### This policy is considered to be linked to Option 2.

- Policy applicable to all types of development on both previously developed sites and greenfield sites
- Assume that the policy helps to prevent under-development, but would not result in overdevelopment, as specified in the Supporting Text.
- Assume indirect development impacts are addressed through other policy requirements, e.g. increased resource use etc.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-/+?	-/+?	-/+?	Making the most effective use of sites could prevent the need to develop more sensitive sites, including those with greater ecological value, potentially having positive impacts on this objective. However, maximising site use could also result in greater ecological losses on that site, or having greater ecological impacts around the site, having adverse impacts. Impacts are mixed and uncertain and will depend on the site developed. Mitigation: CPP1 policy CP10 Biodiversity and emerging CPP2 policy which seek to conserve existing biodiversity and achieve net gains.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	Making the most effective use of sites could prevent the need to develop other sites for housing or other uses, e.g. open space. In addition, the policy seeks to ensure that development of a site does not result in inefficient open spaces on site, which should help to ensure usable open space is provided on site.	D	P

				Impacts should be positive.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/+?	-/+?	-/+?	Making the most effective use of sites could prevent the need to develop more sensitive sites, including those with greater landscape value, potentially having positive impacts on this objective. However, maximising site use could also result in greater potential for landscape impacts, having adverse impacts. Impacts are mixed and uncertain and will depend on the site developed. Mitigation: CPP1 SA5 Setting of the SDNP	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-/+?	-/+?	-/+?	Making the most effective use of sites could prevent the need to develop more sensitive sites, including those with greater heritage value or sensitivity, potentially having positive impacts on this objective. However, maximising site use could also result in greater potential for impacts on the adjacent/sensitive historic built environment having adverse impacts. Impacts are mixed and uncertain and will depend on the site developed. Mitigation: CPP1 policies CP12 Urban Design, CP13 Public Streets & Spaces and CP15 Heritage should ensure development conserves or enhances the city's built heritage.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	0	0	0	There are no impacts on this objective. Impacts of development on this objective addressed by other policy.		
12. To minimise and sustainably manage waste	+	+	+	Although development will result in production of waste and construction and operation stages, the policy does seek to maximise efficient design, which could include e.g. development types that use less resources when compared with less efficient design. This would have positive impacts on this objective.	D	P
13. To make the best use of land available	++	++	++	The policy should lead to development being maximised on a site, which will help to make the most of the land available. It also seeks to avoid leftover, inefficient spaces which become unusable, also helping to make the most of land in the city. Impacts should be significantly positive.	D	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy is applicable to all types of development including housing. Maximising the amount of development delivered on a site will help increase provision of housing. The policy also requires that an appropriate mix of housing is delivered across the site to meet the city's needs. Impacts should be significantly positive.	D	P

15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy seeks to maximise opportunities to deliver a mix of uses across each site. This could include services and facilities (e.g. A and D uses) and would therefore help to increase provision. Delivery of these uses on a mixed use site would also facilitate access to them. Impacts should be positive.	D	P
16. To improve health and well-being, and reduce inequalities in health	-/+	-/+	-/+	The policy should help to increase provision of housing, as well as land in other uses, which contribute to delivering the wider determinants of health. However maximising development on a site could have amenity impacts particularly for existing communities, such as noise and traffic impacts, although it is recognised that the supporting text refers to other policies that will be applicable in order to avoid over-development. Impacts are considered to be mixed. Mitigation: emerging CPP2 policy on Amenity should help to minimise the risk of amenity impacts.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The policy is applicable to all types of development including employment floorspace and the policy seeks to maximise the opportunity for a mix of uses across a site. Maximising the amount of development delivered on a site will help increase provision of employment uses. Impacts should be significantly positive.	D	P

### Summary

- The policy has potential for significant positive impacts on the objectives for making the best use of land, housing delivery and economic development. The policy should lead to the development capacity of a site being maximised and sites being used efficiently for a range of uses, including housing and employment. This will help to make the best use of sites in the city and should increase provision of housing and employment space.
- The policy also has potential for positive impacts on the objectives for open space, waste reduction and access to services. The policy could indirectly help to reduce the pressure to develop other sites, including land in open space uses, by maximising use of a site, and the policy also seeks to ensure that development avoids inefficient open spaces being created on a site. The policy should result in efficient design and layouts, which may result in a more efficient use of resources and reduce waste. The policy also supports delivery of a mix of uses across a site, which could help to increase provision of services and access to them, depending on the type of uses delivered.
- The policy has potential for mixed adverse and positive impacts on the objectives for biodiversity, SDNP, and heritage as maximising capacity site could help to avoid the need to develop the most sensitive sites having positive impacts, however could mean that there is a greater risk of adverse impact on or near the site themselves. These impacts would depend upon the sensitivity of the site developed and are fairly uncertain. The policy also has potential for mixed impacts for health, as maximising potential on site could result in increased amenity impacts.



**Recommendations and Mitigation**

- Mitigation for potential adverse impacts arising from development is considered to be provided by existing adopted policy including CP10 Biodiversity, CP12 Urban Design, CP13 Public Streets & Spaces, CP15 Heritage, SA5 Setting of the SDNP, and emerging CPP2 policy, including those relating to biodiversity and amenity
- No further recommendations.

**CPP2 Policy Appraisal: DM20 Protection of Amenity**

**Options Stage**

4. Option 1) No specific policy framework to manage the protection of amenity in the City Plan Part Two (rely on existing policy guidance – NPPF, NPPG and CPP1 policies CP12, CP13 or combination of other CPP2 policies)
5. Option 2) Progress Local Plan Policy QD27 into city-wide criteria-based policy
6. Option 3) Amenity issues incorporated into other policies, including those for allocated sites/development areas

**This policy is considered to be linked to option 2**

**Assumptions:**

- This policy deals with impacts of development on people. It does not deal with impacts on other receptors, e.g. the environment, which are addressed in other policy. In addition it does not deal with nuisance impacts, such as noise and pollution, as these are also addressed in other policy.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
12. To minimise and sustainably manage waste	0	0	0	Protection of amenity could prevent or restrict certain types of development from coming forward, such as waste-related development. However, as specific sites or areas for waste uses have been identified in the WMP (2013) and WMSP (2017), and as CPP1 (2016) identifies industrial estates as being suitable for some waste uses, it is assumed that waste-type development will come forward in those locations, where impacts on amenity are unlikely to be an issue.		

				Impacts therefore considered to be neutral.		
13. To make the best use of land available	-	-	-	<p>Protection of amenity as described in the policy includes the consideration of issues such as visual privacy, overlooking, outlook, overshadowing, and sunlight and daylight. A taller development could have adverse impacts on all of these issues. The policy may therefore prevent some higher density and taller developments from coming forward, having an adverse impact on this objective, as these types of development make a good use of the land available.</p> <p><b>Mitigation:</b> Existing adopted policy provides guidance where higher density/taller buildings would be acceptable: CPP1 DA policies indicate locations where higher density development would be acceptable; CP12 Urban Design sets out the 9 areas with potential for taller developments and has the hook for the Urban Design Framework SPD which will provide further detail on the boundaries of tall building nodes and guidance on appropriate height ranges; CP14 Housing Density provides policy guidance on expected densities.</p>	I	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	<p>The policy should have significant positive impacts on this objective. The main aim of the policy is to protect amenity of the proposed new development or that of existing residents, users or occupiers. The supporting text specifically refers to considerations such as visual privacy, overlooking, outlook, overshadowing and sunlight and daylight. Consideration of the impacts of development on these issues should have a significantly positive impact on health and well-being. Other issues that could arise from development that could have health and amenity impacts, such as pollution and noise, are addressed in emerging CPP2 policy Protection of Environment &amp; Health.</p>	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>Although the policy seeks to protect amenity, and therefore prevent unacceptable over-looking, the supporting text refers to circumstances where a degree of over-looking could have beneficial impacts for this objective, through providing opportunities for natural surveillance, which can deter crime.</p>	I	P

### Summary

- The policy has potential for significant positive impacts on the objectives relating to health. The policy should prevent unacceptable loss of privacy, outlook, and day/sunlight and should prevent overshadowing both for new occupiers of a development as well as those in existing buildings, having positive impacts on health and well-being.

- The policy refers to situations whereby over-looking could provide natural surveillance, potentially having positive benefits for community safety.
- The policy has potential for adverse impacts on the objective for making the best use of land. Protection of amenity could prevent certain types of development from coming forward which could include those which are of higher density/taller buildings, which could use the land available more efficiently.

### Recommendations

- There are no recommendations for changes. Mitigation regarding making the best use of land available is provided by existing CPP1 policy which provides clear direction for where taller buildings are acceptable.

### CPP2 Policy Appraisal: DM21 Extensions & Alterations

#### Options Stage

- Option 1) No policy framework in CPP2 to manage the extensions and alterations policy in the City Plan (rely on general design policies in CPP1 (CP12, CP13), PD rights and building regs.
- Option 2) Progress Local Plan Policy QD14 and SPD 12 Design Guide for Extensions and Alterations into a single, city-wide policy in the City Plan (additional restrictions for Conservation Areas to be outlined via Heritage policies) (e.g. no SPD)
- Option 3) Progress Local Plan Policy QD14 and elements of SPD 12 Design Guide for Extensions and Alterations into City Plan city-wide policy and review SPD12 to make it more flexible (additional restrictions for Conservation Areas to be outlined via Heritage policies)

#### This policy is considered to be linked to option 3

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	0	There is no direct impact on this objective. The policy relates to extensions to existing buildings, and although this could reduce the size of private gardens, these do not form part of the open space network.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable	+	+	+	The policy requires development to be well designed and sited in relation to the surrounding area. This should help to ensure that the landscape character and special characteristics of the SDNP and its setting are	D	P

access to it				considered and protected where extensions to buildings are taking place within the setting of the SDNP.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The emerging CPP2 heritage policies provide detailed policy which will be applicable to development within Conservation Areas or that affect heritage assets, including extensions. However this policy requires development to be well designed and sited in relation to the surrounding area and that extensions use materials sympathetic to the parent building. This should help to ensure that heritage assets are protected and conserved, and that the existing character of neighbourhoods is taken into account having positive impacts for this objective.	D	P
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	Extensions and alterations could result in a more intensive use within a building, e.g. thorough additional occupiers. Although water efficiency is mainly dealt with through CPP1 CP8 Sustainable Buildings, the supporting text includes a reference to ensuring compliance with Building Regulations, including efficiency measures, as well as opportunities for retro-fitting. This would include water efficiency and is therefore considered to have positive impacts on this objective.	D	P
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	Extensions and alterations could result in increased energy consumption. Although energy efficiency is dealt in part through CPP1 CP8 Sustainable Buildings, the supporting text includes a reference to ensuring compliance with Building Regulations, including efficiency measures, as well as opportunities for retro-fitting. This would include energy efficiency measures and is therefore considered to have positive impacts on this objective. Emerging CPP2 policy on energy standards will also address this issue in greater detail.	D	P
13. To make the best use of land available	+	+	+	Extensions and alterations may allow residents/occupiers to change and adapt their homes/premises in order to better meet their needs. They could help to make a better use of existing buildings, and could also help to bring vacant buildings back into use by improving their functionality and space. The policy is therefore considered to have potential to have an indirect positive impact on this objective.	I	P
14. To provide housing, including affordable housing, to contribute	+	+	+	The policy is applicable to extensions of buildings in all uses. Extensions to residential properties could result in an increase in housing supply, e.g.	D	P

towards meeting local needs				through the creation of a self-contained unit within an existing residential property. It could also provide the opportunity to improve existing housing. The policy is therefore considered to have a positive impact on this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy requires extensions to be well-designed, sited and detailed in relation to neighbouring properties. Poorly designed extensions or those which result in amenity issues can have a detrimental effect on health and well-being. The policy should therefore have a positive impact on this objective through protecting the health of adjacent/adjoining occupiers.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy is applicable to extensions of buildings in all uses. Extensions to commercial properties will result in an increase in an increase in commercial floorspace which will help to increase the supply of land in employment uses. The policy will therefore have a positive impact on this objective.	D	P

### Summary

- The policy has potential for positive impacts on objectives relating to SDNP, heritage assets, water quality, greenhouse gas emissions, making the best use of land, housing, health and economic development. The policy should result in well-designed developments that help to protect and respect heritage assets and the setting of the SDNP, as well as helping to protect the health and amenity of neighbouring residents; supports development that is energy and water efficient; should help to make better use of land/building stock; and could help to improve housing and increase land for commercial uses.

### Recommendations

- There are no recommendations for changes or requirements for mitigation as generic impacts of development are addressed through other policy.

### CPP2 Policy Appraisal: DM22 Landscape Design & Trees

#### Options Stage:

- Option 1) No policy framework in CPP2 to address and protect landscape design and trees but rely on NPPF and high level policy CP10 Biodiversity, CP12 Urban Design, CP13 Public Streets and Spaces, CP16 Open Space.
- Option 2) One criteria based policy addressing landscape design and trees
- Option 3) Two policies in CPP2 : one for landscape design and one for trees and hedgerows similar to the Local Plan

**This policy is considered to be linked to Option 2**

<b>SA Objective</b>	<b>Short-term</b>	<b>Med-term</b>	<b>Long-term</b>	<b>Summary of Effects</b>	<b>Dir/Ind (D/I)</b>	<b>Temp/Perm (T/P)</b>
1. To protect, conserve and achieve a net gain in biodiversity	++	++	++	The policy should lead to the integration of landscape design within developments, which could include, for example SUDs, greenroofs/walls, and pollinator plants all of which have benefits for and should ensure there is a net gain in biodiversity. The policy should lead to the retention of existing trees and hedgerows where possible, or replacement of any felled trees. The policy also requires that planting is appropriate to the site, and specifies the use of native species. The policy also provides guidance with regards to works that may affect a protected tree. The policy has potential to have significant positive impacts on this objective.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	Appropriately designed areas between and around buildings can help developments to meet their open space requirements, and the policy requires any proposals for landscape design to ensure that open space requirements of the development are met. In addition, the policy refers to making more effective use of existing landscape features to help improve use of existing open spaces. Impacts should be positive.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	Landscape design can be used to help integrate a development into the surrounding environment, which could include the SDNP depending on the location of development. Impacts should be positive.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Landscape design can be used to help integrate new development into the surrounding environment. This could include development that may affect Conservation Areas and Registered Parks & Gardens and could help ensure the impact on heritage assets is positive. In addition, good landscape design could help to improve streetscape and townscapes, contributing positively towards achieving this objective.	I	P
6. To improve air and noise quality	+	+	+	Biodiversity performs various natural functions, including absorbing air pollutants and can help to reduce noise. The policy should therefore have an	I	P

				indirect positive impact on this objective.		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	The policy suggests that certain features could be incorporated into landscape design, including SuDS which can help to reduce surface water flood risk and help reduce the risk of pollution to water. This supports the achievement of this objective.	D	P
8. To reduce the risk from all sources of flooding to and from development	++	++	++	The policy suggests that certain features could be incorporated into landscape design, including SuDS which can help to reduce surface water flood risk. In addition, green infrastructure in general will absorb water and can help to reduce flooding incidents, and the policy also requires the use of permeable hard landscape materials when practical which should also help to reduce flood risk. This supports the achievement of this objective and should result in significant positive impacts.	D	P
10. To increase the city's resilience and ability to adapt to climate change	++	++	++	Landscape design including natural features such as greenroofs/walls, trees and planting can help with climate change adaptation through helping to maintain urban temperatures. In addition, other features such as SUDS can also climate change adaptation by helping to reduce surface water flood risk. The policy also specifically requires development to consider climate control and measures which support climate change adaptation. The policy should have significant positive impacts on this objective.	D	P
13. To make the best use of land available	+	+	+	The policy could lead to a more effective use of land as requires development to make better use of existing landscape features where possible, e.g. by enabling multi-functional uses within design, e.g. children's play or food growing. This could have positive impacts on this objective.	I	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	Developments that look good, incorporating green infrastructure can contribute towards supporting good quality of life and mental well-being. In addition, green infrastructure and features incorporated into landscape design can help improve environmental quality, such as air and noise quality and therefore also indirectly lead to a healthier environment. Areas of landscape design could also provide the opportunity for informal activity, therefore supporting healthy lifestyles. In addition, features that will help assist with climate change adaptation will help support health in the long term. Overall impacts should be positive.	I	P

## Overall Summary

- The policy should have significant positive impacts on the biodiversity objective. The policy should lead to the incorporation of biodiversity features into landscape design, such as greenroofs/walls, should lead to the retention and protection of trees, particularly protected trees, and should result in incorporation of planting which is native and suitable for the site.
- The policy should also have significant positive impacts on the objectives for reducing flood risk, climate change adaptation and health. The policy should lead to landscape design that incorporates features which perform a natural function, such as SUDS, green roofs and other forms of green infrastructure. These have multiple environmental benefits including reducing flood risk and helping maintain urban temperatures, and therefore supporting climate change adaptation. Green infrastructure can improve environmental quality, including air and noise quality and can also provide the opportunity for informal physical activity, contributing towards healthy lifestyles. In addition, visually attractive landscape design can contribute towards supporting good quality of life and mental well-being.
- The policy should also have a range of positive impacts for objectives for open space, SDNP, heritage/townscape, air quality, water quality, and making the best use of land. Landscape design can help contribute towards meeting a development's open space requirements, and good landscape design can help development integrate into its surroundings, which could include for example, the SDNP or the historic built environment, as well as helping to improve the streetscape. Features that are incorporated into landscape design perform natural functions, such as helping to improve air and noise quality, and could also help to make the best use of land, by helping to make more effective use of existing landscape features.

## Recommendations and Mitigation

- There are no further recommendations for changes or requirements for mitigation.

## CPP2 Policy Appraisal: DM23 Shop Fronts

### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1
- Option 2) No specific policy but rely on the NPPF, high level policy CP12 in CPP1 and retain existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)
- Option 3) Include policy wording on shop fronts and advertisements in the Place Making policy.
- Option 4) Have a specific policy in CPP2 on Shop Fronts and Advertisements supported by retained existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)

**This policy is considered to be linked to option 4**



SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	<p>The policy sets clear criteria for shop front applications in all locations which should result in well-designed shop fronts in relation to the parent building, should ensure that any architectural remains visible and should ultimately result in shops that contribute towards an attractive streetscape.</p> <p>The policy also sets additional requirements for shops within conservation areas and listed buildings which should lead to the preservation or enhancement of the architectural and historic interest of the area or building, and should also lead to the retention of good quality traditional shop-fronts. Overall the policy should help to strengthen local character across the city, should help to protect and conserve the city's historic built environment where relevant, and should have a significant positive impact on this objective.</p>	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	<p>Although the policy will not increase provision of services, the policy requires new shop fronts to be accessible to all, and should therefore improve access. Impacts should be positive.</p>	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>The policy supports measures which improve the security of shops, provided they are well designed and integrated into the shop front. The policy seeks to maintain a visible window display where possible, which have been found to reduce the fear of crime where implemented, however sets criteria for where solid shutters will be permitted, e.g. in isolated locations or where security poses a real problem. The policy also acknowledges there may be circumstances when temporary security measures are required, e.g. during periods of vacancy. Overall, the policy should have positive impacts on this objective.</p>	D	P
18. To increase equality and social inclusion	+	+	+	<p>The policy requires new shop fronts to have taken all reasonable measures to make the shop front accessible to all. This should help to ensure consideration of how people with certain protected characteristics access the shop, including disabled people and older people who may have mobility difficulties. This would have a positive impact on this objective.</p> <p>In addition, following SA recommendation on an earlier iteration, the supporting text was amended to include a specific reference to access for</p>	D	P

				people with protected characteristics which further strengthens the policy in relation to this objective.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy supports and should lead to improvements in shop front design. Improvements to individual shops can help to make an area more attractive or welcoming and may contribute towards increasing footfall, having economic benefits. Impacts should be positive.	I	P

**Overall Summary**

- The policy should result in significant positive impacts for the heritage/townscape objective. The policy should result in well-designed shops that retain architectural details and ultimately contribute towards an improved streetscape. In addition, the policy should lead to the preservation or enhancement of the architectural and historic interest of shops within conservation areas or listed buildings where relevant, helping to protect the historic built environment.
- The policy should result in positive impacts for the objectives relating to access, community safety, equalities and economic development. The policy should result in measures which improve security and reduce fear of crime, and should help to improve access to premises for all. It is noted that the supporting was amended to incorporate an SA recommendation on a previous iteration by including a specific reference to protected characteristics and the Equality Act 2010, which further strengthens the impact for the equalities objective. The policy may also have economic benefits through improvements to shops which contribute towards making an area more attractive and welcoming, potentially increasing footfall.

**Recommendation and Mitigation**

- There are no further recommendations or requirements for mitigation. The following SA recommendation on an earlier iteration of the policy was incorporated into the supporting text as follows:

“There are usually sound reasons why a replacement shop front may be proposed. The existing one may be in poor condition, visually unattractive, unsuitable for the proposed use or may suffer from poor accessibility, for example for people with protected characteristics as defined by the Equalities Act 2010.”

**CPP2 Policy Appraisal: DM24 Advertisements**

**Options Stage**

- Option 1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1

- Option 2) No specific policy but rely on the NPPF, high level policy CP12 in CPP1 and retain existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)
- Option 3) Include policy wording on shop fronts and advertisements in the Place Making policy.
- Option 4) Have a specific policy in CPP2 on Shop Fronts and Advertisements supported by retained existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)

**This policy is considered to be linked to option 4**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The SDNP is designated as a Dark Skies Reserve. The policy does not permit advertisements outside the built up area to be illuminated, which should help to prevent light pollution in this area and help to protect the dark skies of the SDNP. In addition the policy requires any advertisements located outside the built up area to be sensitively designed, which should help to reduce the risk of adverse landscape impacts. Overall impacts should be positive.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The policy should lead to sensitively designed advertisements/signs which do not harm the visual appearance of the streetscape. The policy has specific requirements relating to heritage assets and their settings, which should ensure that no harm is caused to the significance of the heritage asset and therefore contributes towards protecting the historic built environment. Overall impacts should be positive.		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Poorly designed advertisements/signs, e.g. which are too big for their location or over-illuminated can compromise public safety, in particular transport and traffic safety by causing unnecessary distractions or by resulting in impaired visibility. The policy should ensure that public safety is not compromised by badly designed or sited advertisements. Impacts should be positive.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy sets clear criteria which should help to bring forward acceptable applications for advertisements and signs. Advertisements are important to commercial enterprises and therefore the policy should help contribute towards promoting economic activity.	I	P

## Overall Summary

- The policy should also result in positive impacts for the objectives relating to SDNP, heritage/townscape, community safety and economic development. The policy should ensure that advertisements outside the built up boundary do not have any adverse landscape impacts, and should prevent any light pollution in this location. It should result in well-designed advertisements that make a positive contribution to the streetscape and which do not cause harm to heritage assets. It should ensure that public safety is not compromised through poor design, siting or illumination, and should help to bring forward successful applications, which will help to promote economic activity.

## Recommendations and Mitigation

- There are no further recommendations or requirements for mitigation

## CPP2 Policy Appraisal: DM25 Communications Infrastructure

### Options Stage

- No specific development management policy to assess telecommunications applications rely on the NPPF/NPPG and other City Plan Policies to address issues of heritage, amenity and appearance.
- Criteria based telecommunications policy

**This policy is considered to be linked to option 2**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	Policy should help to protect and conserve biodiversity through the requirement for there to be no adverse or unacceptable effect on important wildlife sites.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	Policy should help to protect and conserve SDNP and its setting through the requirement for there to be no adverse or unacceptable effect on areas of landscape value and their settings.	D	P

4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	Policy should help to protect and conserve visual amenity, townscapes and the historic built environment through the requirement for there to be no significant impact on the character or appearance of buildings or street-scene, through the requirement to minimise the size and scale of equipment and for the requirement for equipment to be sensitively located. The policy requires the appearance and character of heritage assets to be conserved or enhanced, and specifies that planning permission/listed building consent may be refused if equipment would harm the appearance, character or setting of heritage assets. The policy also encourages the removal of older redundant equipment, which would also contribute positively towards this objective.	D	P
13. To make the best use of land available	+	+	+	Although not a direct link, the policy requires options for sharing of existing equipment to have been explored prior to submitting an application for installation of new equipment. Any sharing of equipment would have an indirect positive effect on this objective by making use of existing infrastructure.	I	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy will support delivery of telecoms and digital/electronic infrastructure and therefore contributes to providing access to telecoms as a service, as well as digital technology including the internet. Access to internet and communications networks plays a vital role in delivery of certain services, as well as ensuring communities remain connected to them.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Digital/electronic and telecoms infrastructure is essential for sustainable economic growth. The policy provides clarity for industry with regards to the suitability of proposals and should enable development to come forward in appropriate locations. The policy also requires new development to achieve greater digital connectivity than building regulations and ensure sufficient space for digital connectivity infrastructure, helping to facilitate future access to digital technology.	D	P

## Summary

- The policy should have significant positive impacts on the heritage objective and the built environment as should ensure heritage assets are conserved or enhanced.
- The policy should have positive effects for objectives for biodiversity and SDNP through requirements to ensure these various constraints are either conserved or enhanced, or are not adversely affected by development.
- The policy should also have positive effects on objectives for improving access to services, particularly to digital services, and supporting economic growth, due to the essential role that communications technologies play in the local and wider economy and the clarity the policy provides in terms of where development will be found acceptable.
- The policy should have a neutral effect on health, through the avoidance of any health effects that may result from telecoms infrastructure, such as increased radiation exposure.

### Recommendations

- The initial SA of an earlier draft of the policy recommended adding a definition of “areas of ecological interest” within the supporting text in relation to policy point c to add clarity. Both the policy and supporting text were amended as a result of this to refer to “important wildlife sites” instead of “areas of ecological interest”, to make the policy consistent with wording in other policies.
- There are no further recommendations or requirements for mitigation.

### CPP2 Policy Appraisal: DM26 Conservation Areas

#### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Conservation Areas

**This policy is considered to be linked to option 4**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a	+	+	+	The policy supports the retention of trees and gardens within Conservation	D	P

net gain in biodiversity				Areas where these are integral to the area's designation. In addition, the supporting text provides guidance on when development in back gardens will be acceptable and should ensure that appropriately sized gardens are retained. Policy should have positive impacts on biodiversity. In addition, some Conservation Areas include areas of open space which could have benefits for biodiversity.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	Some Conservation Areas include areas of open space and this can form part of their designation. Preservation or enhancement of conservation areas would be achieved through the policy, and this could have an indirect positive effect on open space within it that forms part of the designation.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The Patcham and Stanmer Conservation Areas are both situated within the SDNP. Also, both Ovingdean and Rottingdean Conservation Areas are situated adjacent to the SDNP boundary. The policy should lead to the preservation and enhancement of all conservation areas. This should also have an indirect positive effect on the SDNP and its setting, particularly through preservation of conservation areas that form part of the setting of the SDNP, and also through the preservation of key views which could include those to/from the SDNP.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy should have a significant positive impact on this objective. The policy supports development within conservation areas, including alterations, changes of use and new buildings, which preserves or enhances the character and appearance of the area. It includes key considerations for proposals such as typical building forms, key views, visible elevations and building materials, as well as considering the retention of a mix of uses that contribute positively to the area's character. The policy requires new development to be of a high quality design. The policy also supports demolition of buildings which harm the character of the conservation area, and demolition of buildings which cannot be brought back into a viable long term use. The policy should therefore result in preservation and enhancement of conservation areas, should help to support the integration of new development into the historic environment, should help to protect and strengthen local character, should ensure that existing character is taken into	D	P

				account and should lead to high quality design all of which contribute positively towards this objective.		
13. To make the best use of land available	+	+	+	The policy allows change of use of buildings within a conservation area provided the character of the area is preserved or enhanced. Allowing change of use could bring vacant buildings back into use, for example, and this would be a good use of existing building stock.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Tourism is an important part of the local economy, and this includes heritage-based tourism. The policy aims to preserve and enhance the character of conservation areas and this will have an indirect positive effect on this objective by supporting on-going heritage-based tourism.	I	P

### Summary

- The policy has potential for significant positive impacts on the objective relating to the historic built environment. The policy should result in the preservation and enhancement of conservation areas, should help to protect and strengthen local character and should ensure that existing character is taken into account through the range of criteria which must be considered when assessing proposals for alterations, changes of use, demolition and new development. In addition, the policy requires new development to be of high design quality.
- The policy also has potential for positive impacts on the objectives relating to biodiversity, open space, the SDNP, making the best use of land and economic development. The policy supports retention of trees and appropriately sized gardens which could help support biodiversity; could lead to the protection of open space that forms part of a conservation area designation; will lead to the preservation and enhancement of conservation areas including those which fall within or within the setting of the SDNP, and preserve or enhance key views which could include those of and from the SDNP; allows change of use which could help bring empty buildings back into use and make good use of existing building stock; and supports on going heritage based tourism which forms an important part of the local economy.

### Recommendations

- There are no recommendations or requirements for mitigation.



## CPP2 Policy Appraisal: DM27 Listed Buildings

### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Listed Buildings

**The policy is considered to be linked to Option 4, although it is acknowledged that a new SPD will be produced to guide the specific topic of alterations.**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There could be an indirect positive effect on this objective, as some listed buildings provide habitat for certain species. However this is a very indirect and weak link and is not a key aim of the policy. Therefore the policy has been assessed as having no impact on this objective.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy should have significant positive effects on this objective. The policy supports the retention of listed buildings in viable uses and in good state of repair, and allows change of use to help prevent ongoing vacancy, which should lead to their conservation and protection. The policy also sets out criteria against which proposals for alterations, extensions and changes of uses will be considered. This includes for example, the exterior, the interior, curtilage features, boundary features and the design quality of the proposals. The policy should therefore result in conservation and protection of listed buildings and should help to protect and strengthen local character.	D	P
12. To minimise and sustainably manage waste	+	+	+	The policy supports the retention of listed buildings in active uses and good repair. It also permits the change of use to listed buildings, particularly where on-going vacancy is a concern. The policy therefore has an indirect positive effect on this objective as should help prevent against listed buildings falling into disrepair, or at risk, which may ultimately result	I	P

				in demolition and production of waste.		
13. To make the best use of land available	+	+	+	The policy supports bringing vacant properties back into viable use, provided that the special interest of the building is conserved. This will have a positive effect on this objective by reducing the number of vacant buildings and making better use of existing building stock.	D	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	+	+	Listed buildings provide a number of uses, including housing. The policy permits alterations and extensions to listed buildings, provided that the special features and characteristics of the building are not harmed. Being able to alter or extend a home can enable householders to improve the quality of their home or enable them to meet their changing requirements, and therefore indirectly supports this objective.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Tourism is an important part of the local economy, and this includes heritage-based tourism. The policy aims to conserve listed buildings and this will have an indirect positive effect on this objective by supporting on-going heritage-based tourism. The policy also allows alterations and extensions, which could enable changes to be made to listed buildings in commercial uses that would improve their functionality.	I	P

### Summary

- The policy has potential for significant positive impacts on the objective relating to the historic built environment. The policy should result in the conservation and protection of listed buildings through supporting their retention in active uses, allowing change of use when vacant, and supporting them being kept in good repair. In addition, the policy permits proposals for extensions, alterations and changes of use provided there is no harm to the special interest of the building and provides clear criteria which must be considered.
- The policy also has potential for positive impacts on the objectives relating to waste minimisation, making the best use of land, housing and economic development. The policy should help reduce the risk of disrepair and demolition, helping to prevent production of waste materials; allows for change or use which would help bring empty buildings back into use and make good use of existing building stock; may enable householders to make alterations and extensions to their home which may improve the quality of their home or enable them to change it to meet changing housing needs; and supports on-going heritage based tourism through conservation of heritage assets which forms an important part of the local economy.

### Recommendations

- There are no recommendations for changes to the policy and no requirements for mitigation.

## CPP2 Policy Appraisal: DM28 Locally Listed Heritage Assets

### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Locally Listed Heritage Assets

**This policy is considered to be linked to option 4**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The Local List includes some open spaces which may provide habitats for certain species or may form part of the wider green network or Nature Improvement Area. The protection of Locally Listed Heritage Assets would be achieved through this policy, and this could have an indirect positive effect on this objective through the potential to also conserve biodiversity.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	++	++	++	The Local List contains areas of open spaces of various typologies including Parks and Gardens, Outdoor Sports, Cemeteries, and Natural & Semi-natural. The protection of the locally listed open spaces would be achieved through the policy, and this could have an indirect positive effect on this objective through the potential to also protect open spaces which form part of the key component of a local listing.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There are no Locally Listed Heritage Assets that fall within the SDNP. There are therefore no impacts on this objective.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy should have significant positive impacts on this objective. The policy supports retaining locally listed heritage assets in continued viable uses and will only allow demolition or substantial alteration where retention and reuse has been fully explored. The policy also requires that any	D	P

				alterations or extensions to the assets should be of a high standard of design, as should development within its curtilage. The policy also indicates that new non-designated heritage assets may be identified and that these will be reviewed in accordance with local selection criteria. The policy should lead to the protection and conservation of locally listed heritage assets, as well as potential to identify new assets.		
8. To reduce the risk from all sources of flooding to and from development	+	+	+	Some Locally Listed Heritage Assets include areas of open space and the policy will help to protect these as open spaces where they form part of a key component of the local listing. This will have an indirect positive impact on this objective based on the role that open spaces and the natural environment play in water absorption and flood risk reduction.	I	P
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	Some Locally Listed Heritage Assets include areas of open space and the policy will help to protect these as open spaces. This will have an indirect positive impact on this objective based on the role that open space and the natural environment has in water absorption and flood risk reduction, as well as helping to maintain urban temperatures, and therefore climate change adaptation.	I	P
12. To minimise and sustainably manage waste	+	+	+	The policy encourages the retention and use of locally listed assets, which has positive implications for this objective. The policy does allow demolition of a locally listed asset where there is no option for its retention or reuse and although this could generate waste, these impacts are considered to be addressed through adopted Waste & Minerals Local Plan Policy WMP3d "Minimising & Managing Waste during Construction, Demolition and Excavation". In addition mitigation is considered to be provided by the policy itself which states that options for retention and reuse will need to have been fully explored, and also the supporting text which was amended following SA recommendation which now provides further explanation regarding the requirement for satisfactory evidence to justify demolition. Overall impacts are considered to be positive.	I	P
13. To make the best use of land available	+	+	+	The policy supports the retention of assets in a continued use. This would include supporting changing use if this would ensure an ongoing use of the asset, provided the special interest of the asset was maintained. This could help to bring back into use vacant sites, for example, and would help to	D	P

				make best use of existing building stock having a positive impact on this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Some Locally Listed Heritage Assets include areas of open space. Access to open space can facilitate opportunities which promote physical activity and supports mental well-being, which will have a positive effect on health.	I	P

### Summary

- The policy has potential for significant positive impacts on the objective relating to the historic built environment. The policy should result in the retention and use of locally listed heritage assets, thus supporting their preservation. It also requires any new development, as well as alterations and extensions to locally listed assets, to be of a high design standard that respects the interest of the asset, and this should help to preserve their character.
- The policy also has potential for positive impacts on the objectives relating to biodiversity, open space, flood risk, climate change adaptation, and health. The positive impacts for these objectives are based on the fact that some open spaces are either a key component of, or form the main reason for a local listing. Therefore, as the policy could help to protect these open spaces this has potential for various other indirect positive effects depending on the form and function of the open space, including biodiversity, reduction in flood risk and space for physical activity/mental well-being.
- The policy also has potential for positive impacts on the objective relating to making the best use of land, as the policy supports the continued use of assets, which would include supporting changing the use, and this could help to bring empty buildings back into use and make good use of existing building stock; and for waste minimisation as the policy strongly encourages retention and reuse of buildings, although does allow demolition. The policy was amended following initial SA assessment to incorporate wording regarding justifying any loss, and this should help to protect against any needless loss and reduce the risk of adverse impact against this objective.

### Recommendation and Mitigation

- The initial SA found the impact on the waste objective to be negative and recommended that further guidance in the supporting text could be added to help reduce the risk of adverse impact. An additional paragraph was added to the supporting text requiring satisfactory evidence to be provided to justify any loss. Although demolition still may occur, the policy should prevent against any needless loss.
- There are no further recommendations.
- Mitigation for demolition waste addressed by WMLP 2013 policy WMP3d Minimising & Managing Waste during Construction, Demolition and Excavation.

**CPP2 Policy Appraisal: DM29 The Setting of Heritage Assets**

**Options Stage**

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on The Setting of Heritage Assets

**This policy is considered to be linked to option 4**

**Assumptions:**

- There are various features of an urban environment that can be considered to form or contribute towards the setting of a heritage asset. This could include other buildings, trees, green open spaces, other public spaces, public realm, the sea, and the Downs.
- It could include features that are in close proximity to the asset, as well as features that are some distance away which form views that the asset is placed within.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+?	+?	+?	The policy could have a positive effect on this objective, as this could result in conservation of ecological features that form the setting, such as trees and open spaces. However this is fairly uncertain and will depend on the asset and the features that form the setting.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+?	+?	+?	The policy could have a positive effect on this objective, as this could result in protection of open spaces that form the setting. However this is fairly uncertain and will depend on the asset and the features that form the setting.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The policy refers to the relationship of the asset with Downland landscape, and views from, to, through and across the asset being key considerations when assessing proposals for development. These considerations should result in a positive impact on this objective as should help protect and conserve the SDNP and its setting.	D	P

4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy should have a significant positive impact on this objective. The policy should lead to protection of the setting of heritage assets, as well as encourages opportunities to enhance the setting through new development. The policy sets out various considerations which should help to guide development that is within the setting of a heritage asset and should help to support the integration of new development into the historic environment. Protection of the setting of heritage assets will also help to ensure the heritage asset itself is protected.	D	P
8. To reduce the risk from all sources of flooding to and from development	+?	+?	+?	The setting of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option will help to protect these open spaces and this could have an indirect positive effect regarding reducing flood risk, based on the role that the natural environment and open spaces play in water absorption, however is also considered to be fairly uncertain as will depend on the asset and features that form the setting.	I	P
10. To increase the city's resilience and ability to adapt to climate change	+?	+?	+?	The setting of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option will help to protect these open spaces and this could have an indirect positive effect regarding climate change adaptation, based on the role that the natural environment and open spaces play in water absorption and flood risk prevention as well as temperature regulation. This is also considered to be fairly uncertain as will depend on the asset and features that form the setting.	I	P
16. To improve health and well-being, and reduce inequalities in health	+?	+?	+?	The setting of some heritage assets could include, for example, gardens or grounds or other designated open spaces. This option will help to protect these open spaces and this could have an indirect positive effect on health due to opportunities for physical activity and promotion of good mental well-being that can result from access to open space. However this is fairly uncertain as will depend on the asset and features that form the setting.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment	+	+	+	Heritage based tourism forms an important part of the local economy. The policy should lead to lead to protection of the setting of heritage assets and this will contribute towards supporting on-going heritage-based tourism	I	P

opportunities and meet local employment needs.				having a positive impact on this objective.		
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### Summary

- The policy has potential to have significant positive impacts on the objective relating to the historic built environment. The policy should result in the protection of the setting of heritage assets, encourages opportunities to enhance the asset, and supports the integration of new development into the historic built environment.
- The policy also has potential for positive impacts on the objectives relating to the SDNP and economic development. The policy may result in consideration and protection of downland and/or views of or from the SDNP that form part of the setting of heritage assets and consideration of these features will help to protect the SDNP and its setting. The policy will support on-going heritage based tourism that forms an important part in the local economy.
- The policy also has potential for positive impacts, although fairly uncertain, on the objectives relating to biodiversity, open space, flood risk, climate change adaptation, and health. The positive impacts for these objectives are based on the assumption that ecological features or open spaces could form a key component of the setting of heritage assets. Therefore the policy could help to protect these features which then leads to the potential for various other indirect positive effects including for biodiversity, reducing flood risk, maintaining urban temperatures and providing space for physical activity/good mental well-being.

### Recommendations and Mitigation

- There are no recommendations for changes to the policy and no requirements for mitigation.

### CPP2 Policy Appraisal: DM30 Registered Parks and Gardens

#### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Registered Parks & Gardens

**This policy is considered to be linked to option 4**



SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	Some Registered Parks & Gardens include Sites of Nature Conservation Interest, Local Nature Reserves (declared/proposed) and/or areas of ancient woodland. Preservation or enhancement of the components that make up the Registered Parks & Gardens would be achieved through the policy, and this could have an indirect positive effect on this objective through the potential to also conserve biodiversity.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	All Registered Parks & Gardens in Brighton & Hove include areas of open space of various typologies including Parks and Gardens, Outdoor Sports, Cemeteries, Natural & Semi-natural, and privately owned parks & gardens. Some of these open space designations will make up part of the Registered Park & Garden designation. Preservation or enhancement of the components that make up the Registered Parks & Gardens would be achieved through the policy, which could include the open spaces, and this will have a direct positive effect on this objective.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The Stanmer Park Registered Park & Garden is situated within the setting of and within the SDNP. Preservation and enhancement of Registered Parks & Gardens would be achieved through the policy, and this would have an indirect positive effect on this objective.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy should have a significant positive impact on this objective. The policy allows development within a RP&G provided that the historic character, features and components of the RP&G are preserved or enhanced. The impact of development on views within and across the park or garden will be a particular consideration. The policy should therefore lead to the preservation of registered parks and gardens and supports the integration of new development into the historic environment. The policy includes consideration for temporary uses which should ensure that temporary uses are only permitted if the harm caused is temporary, minor and easily reversible. Overall, although some temporary uses may cause temporary harm, the	D	P

				policy should result in the preservation and enhancement of RP&G.		
8. To reduce the risk from all sources of flooding to and from development	+	+	+	As described under Objective 2, all Registered Parks & Gardens also contain open spaces, some of which are of a naturalised form. This option will lead to the preservation and enhancement of the components of the Registered Parks & Gardens, including the open spaces, and this will have an indirect positive effect on this objective, based on the role that the natural environment and open spaces play in water absorption and reducing flood risk.	I	P
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	As described under Objective 2, all Registered Parks & Gardens also contain open spaces, some of which are of a naturalised form. This option will lead to the preservation and enhancement of the components of the Registered Parks & Gardens, including the open spaces, and this will have an indirect positive effect on this objective, based on the role that the natural environment and open spaces play in water absorption, reducing flood risk, and maintaining urban temperatures.	I	P
13. To make the best use of land available	+	+	+	Allowing temporary uses within RP&G contributes towards making the best use of land available.	I	T
16. To improve health and well-being, and reduce inequalities in health	+	+	+	All Registered Parks and Gardens include areas of open space, and these components of the RP&G will be preserved and enhanced through the policy. Access to open space can facilitate opportunities which promote physical activity and supports mental well-being, which will have a positive effect on health.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy should lead to the preservation and enhancement of RP&G, some of which form a major contribution to heritage-based tourism, which is an important part of the local economy e.g. the Royal Pavilion Estate. In addition, the permission of temporary uses within RP&G, may also support economic activity, e.g. the temporary ice-rink at the Royal Pavilion; events as part of Brighton Festival.	I	P

### Summary

- The policy has potential to have significant positive impacts on the objective relating to the historic built environment. The policy should result in the preservation and enhancement of registered parks and gardens through permitting development which preserves the historic layout, character and components of the park and garden, and also by ensuring that views within or across the park and garden are considered. It is acknowledged that some

temporary uses may be allowed which could temporarily harm the registered park and garden. However as these are temporary and will be subject to assessment, these are not considered to significantly affect the result.

- The policy also has potential for positive impacts on the objectives relating to biodiversity, open space, flood risk, climate change adaptation, and health. The positive impacts for these objectives are based on the fact that open spaces form a key component of the Registered Park & Garden designation. Therefore, as the policy could help to preserve or enhance these open spaces this has potential for various other indirect positive effects depending on the form and function of the open space, including biodiversity, reduction in flood risk and space for physical activity/mental well-being.
- The policy also has potential for positive impacts on the objectives relating to making the best use of land and economic development. The policy supports temporary uses, which could make good use of land available in the city, particular for outdoor-type events; and the policy will result in the preservation and enhancement of heritage assets, e.g. the Royal Pavilion Estate that are a major contributing factor to heritage-based tourism, as well as allows temporary uses which could also contribute towards the local economy.

### Recommendations

- There are no recommendations for changes to the policy and no requirements for mitigation.

### CPP2 Policy Appraisal: DM31 Archaeological Interest

#### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD
- Option 3) Have a single policy in CPP2 covering all types of heritage asset.
- Option 4) Have a specific policy in CPP2 on Archaeological Sites and Monuments

#### This policy is considered to be linked to Option 4

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There is no direct impact on this objective. Scheduled Monuments and other undesignated heritage assets could have some biodiversity interest, however impacts from implementation of this policy are considered to be negligible		

				and the link between the objectives of this policy and this SA objective are considered to be weak and indirect to result in any certain impact.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	Some of the city's Scheduled Monuments are located on areas of open space. Therefore this policy could have an indirect positive effect on this objective as could lead to greater protection of the open spaces within which the SMs are situated.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	Some of the city's Scheduled Monuments and their settings are located within the SDNP. Therefore this policy could have an indirect positive effect on this objective as could lead to greater consideration of the effects of development on the setting of the SM, which would indirectly include consideration of impacts upon the SDNP.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy supports development within designated sites (Scheduled Monuments) and their settings, and on sites with potential to have archaeological interest (ANAs) provided that the development will not be harmful to the archaeological interest. This should ensure that archaeological assets are protected, in accordance with their significance, and are not harmed by development. The policy sets clear criteria regarding expectations for planning applications, including consultation with the HER, submission of a Heritage Statement, as well as requirements relating to field evaluation, if required. The policy promotes the enhancement and interpretation of any archaeological remains in situ where practical. The policy also seeks to ensure that any archaeological remains that are not preserved in situ, are conserved and stored appropriately, which would support wider understanding of the assets and local archaeology.	D	P
13. To make the best use of land available	+	+	+	Many sites which have potential for archaeological interest (ANAs) are located within previously developed land and in many cases have already been built upon. The policy is not considered to be unduly restrictive and will support development provided it will not be harmful to the heritage asset. This should help to ensure appropriate development continues to come forward and will help to make the most of land available in the city.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment	+	+	+	The policy will lead to the protection of SMs and therefore support any heritage based tourism associated with these assets. In addition, the policy supports development which would not be harmful to these heritage assets,	I	P

opportunities and meet local employment needs.				which should assist in bringing forward appropriate development, having economic benefits.		
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### Overall Summary

- The policy should have significant positive impacts on the heritage objective. The policy should ensure the appropriate protection of heritage assets with archaeological interest, by allowing development provided that it is not harmful to the assets or their settings. The policy should help to ensure that archaeological remains are suitably surveyed and that any archaeological sites/remains are preserved in situ where possible, or where not possible, that assets are appropriately recorded and stored, both of which will support greater understanding of local archaeology.
- The policy has potential to have positive impacts on the objectives for open space, SDNP, making the best use of land and economic development. Some Scheduled Monuments are located within areas of open space, and/or the SDNP, therefore protection of these assets indirectly will help to protect areas of open space and/or the SDNP that they are located within. Many ANAs are located within previously developed land, however as the policy supports development that does not harm the interest of the asset, the policy is not found to be unduly restrictive and may help bring forward appropriate development on areas of previously developed land, which will help to make the best use of land available in the city and support economic growth.

### Recommendations and Mitigation

- There are no recommendations for changes and no requirements for mitigation.

### CPP2 Policy Appraisal: DM32 Royal Pavilion Estate

#### Options Stage

- Option 1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1
- Option 2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in a site specific SPD
- Option 3) No site specific policy but rely on a combination of other policies in CPP2 covering the different types of heritage asset.
- Option 4) Have a specific policy in CPP2 on The Royal Pavilion Estate

**This policy is considered to be linked to option 4**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)

1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The Royal Pavilion Estate includes the garden areas and open spaces around the Royal Pavilion itself. It does not include any ecological designations however the site is within the Nature Improvement Area and forms part of the green network. The policy requires any scheme and proposals which bring together the various elements of the Estate into a single historic estate to encourage greater biodiversity within the gardens and this should have positive impacts on this objective.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The Royal Pavilion Estate incorporates areas of open space of the Parks & Gardens typology. The policy requires any scheme and proposals which bring together the various elements of the Estate into a single historic estate to transform the quality and infrastructure of the gardens. This should help to improve the quality of the open spaces and have a positive impact on this objective. In addition, the policy has requirements relating to temporary uses within the gardens, which should help to protect the gardens.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	The policy supports proposals that seek to re-establish the Royal Pavilion Estate as a single historic estate and has various requirements for how the Estate could be improved. This includes requirements which should improve entrances and arrival, improve security, improve the gardens, manage traffic, improve pedestrian access, improve interpretation, and enhance views into and across the estate. It also supports proposals which increase accessibility and restore areas of the Royal Pavilion itself and has requirements relating to temporary uses and the impacts of these on Estate. The policy should lead to the protection and enhancement of the various elements that comprise the Estate, including the listed buildings and registered park and gardens, should improve the visitor experience and improve understanding of the Estate. Overall the policy should have significant positive impacts on this objective.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	The policy supports proposals that provide better management of traffic into and within the estate, e.g. that are necessary for operational reasons. In addition, the policy supports measures which improve pedestrian circulation through the estate and improve the infrastructure in the gardens, which includes pathways. These measures should help to improve permeability and facilitate pedestrian access having positive impacts on this objective.	D	P
15. To improve the range, quality and	+	+	+	The policy supports measures which improve pedestrian circulation through	D	P

accessibility of services and facilities.				the estate and improve the infrastructure in the gardens, which includes pathways. These measures should help to improve permeability and facilitate pedestrian access having positive impacts on this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The Royal Pavilion Estate includes areas of open space. Access to open space can facilitate opportunities which promote physical activity and supports mental well-being, which will have a positive effect on health.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy supports measures which improve the security within the estate and design-out crime, in particular anti-social behaviour. This should have positive impacts for this objective.	D	P
18. To increase equality and social inclusion	+	+	+	The policy supports measures which increase accessibility to the Royal Pavilion building, and also which improve the quality of infrastructure, including pathways around the Estate itself. Improved pathways and access could particularly be of benefit to people with mobility issues, including disabled and older people, and would therefore have positive impacts on this objective.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Tourism is an important part of the local economy, and this includes heritage-based tourism, with the Royal Pavilion being a key part. The policy should lead to the conservation, protection and enhancement of Royal Pavilion Estate and therefore supports heritage based tourism associated with this asset having benefits for the local economy. In addition, the policy provides clear considerations against which temporary applications will be assessed. This should help to bring forward successful temporary applications which have temporary economic benefits, e.g. festival events, without harming the Estate.	I	T/P

### Overall Summary

- The policy should have significant positive impacts on the heritage objective. The policy should lead to the conservation and enhancement of the various heritage assets that comprise the Royal Pavilion Estate which includes listed buildings and the Registered Park & Garden, through the various measures which would be supported, and result in a more unified historic estate.
- The policy has potential to have positive impacts on the objectives for biodiversity, open space, transport, access, health, community safety, equalities and economic development. The policy should result in greater biodiversity within the gardens and improved quality of existing open spaces. It should result in improved traffic management and improved infrastructure that facilitates pedestrian access. The policy will indirectly provide opportunities for health-promoting activities, through facilitating access to open spaces, and should result in improved community safety. The policy has potential to have benefits for people with protected characteristics, through any improvements to access. The policy will also support economic development, through enhancing the Royal Pavilion estate which is a key draw to heritage-based tourism, and through support for temporary uses, which can have wider economic benefits.

## **Recommendations and Mitigation**

- There are no further recommendations for changes or requirements for mitigation



## Transport & Travel

### CPP2 Policy Appraisal: DM33 Safe, Sustainable and Active Travel

#### Options Stage

1: No additional policy – rely on CPP1 Policy CP9

2: Policy setting more detailed requirements regarding safe and sustainable/active travel

#### This policy is considered to be linked to option 2

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
2. To protect and improve open space and green infrastructure and improve sustainable access to it	?	?	?	The policy should lead to an accessible public realm, improved pedestrian and cycling network, safe & permeable pedestrian and cycling routes, and improved public transport network. It is envisaged that these measures are likely to be proximate to the development delivered and therefore the policy could have a positive impact on this objective, as could include improved sustainable access to open space, however will be dependent on the location of development.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	?	?	?	The policy should lead to an accessible public realm, improved pedestrian and cycling network, safe & permeable pedestrian and cycling routes, and improved public transport network. It is envisaged that these measures are likely to be proximate to the development delivered and therefore the policy could have a positive impact on this objective, as could include improved sustainable access to the SDNP, however will be dependent on the location of development.	<b>D</b>	<b>P</b>
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	The policy includes a range of measures that development should contribute towards or deliver, all of which would promote travel on foot, by bike or by public transport, thus reducing the need to travel by car having significant positive impacts on this objective. These include for example, delivery of high quality public realm, improvements to the pedestrian network such as seating and signage, delivery of high quality cycle routes, provision of cycle parking and	D	P

				cycling facilities, accessible public transport facilities, extended public transport routes and improved interchanges.		
6. To improve air and noise quality	++	++	++	The policy seeks to deliver measures that would facilitate safe travel by foot, bike or public transport. Although it is recognised that heavier vehicles such as trucks, as well as buses, contribute towards poor air quality in certain areas of the city, private cars are also significant contributors to poor air quality. This policy promotes more sustainable forms of transport, should help reduce the need to travel by car and should therefore contribute towards improving air and noise quality.	I	P
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	The policy seeks to deliver measures that would facilitate safe travel by foot, bike or public transport. This policy promotes more sustainable forms of transport, should help reduce the need to travel by car and should therefore contribute towards reducing transport based carbon emissions.	I	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy seeks to deliver measures that would facilitate safe travel by foot, bike or public transport and improve access by sustainable forms of transport. Although these improvements would likely to be associated with the new development delivered, it could also result in improved access to adjacent services, and is therefore considered to have a positive impact on this objective.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	The policy seeks to deliver measures that would facilitate safe and active travel on foot or by bike and improve access by sustainable forms of transport. The policy could therefore have multiple health benefits, as could lead to an increase in active travel, having physical health benefits, as well as lead to a reduction in car use, potentially improving air quality.	D	P
17. To improve community safety, and reduce crime and fear of crime	++	++	++	The policy seeks to deliver measures that would facilitate safe travel on foot, by bike or on public transport. It includes measures such as delivery of safe pedestrian routes, safe cycle routes, and cycle facilities that are well-lit and located in areas of natural surveillance. The policy seeks to ensure that road safety problems are not created by new developments and that development does not prejudice implementation of proposed road safety improvements. The policy should have significant positive impacts on this objective through improvements to road safety and measures which aim to design out crime.	D	P
18. To increase equality and social	++	++	++	The policy seeks to deliver measures that would facilitate travel on the	D	P

inclusion				pedestrian network by wheelchair users and all people regardless of their level of mobility. The policy also specifies that pedestrian routes should be wide enough for their intended use, which may facilitate movement by people with pushchairs and mobility aids, as well as those in wheelchairs. The policy also include a section on safe and inclusive travel and requires development to provide access for disabled people, older people and other vulnerable road users. The policy therefore considers the needs of people with protected characteristics and should have a significant positive impact on this objective.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy seeks to deliver measures that would facilitate sustainable travel by sustainable forms of transport. This could help to reduce the need to travel by car and reduce congestion, having economic benefits. If the policy was being applied to a development providing employment uses, the measures implemented around the site could help facilitate sustainable access to employment.	D/I	P

### Summary

- The policy has potential for significant positive impacts for the objectives relating to reducing the need to travel by car, improving air quality, improving health, increasing equalities and improving community safety. The policy should ensure that developments contribute towards or provide measures which will facilitate safe and active travel on foot, by bike or by public transport, thus helping reduce the need to travel by car and having benefits for air quality and health. The policy should ensure the needs of people with protected characteristics are met through the delivery of improved public realm that consider the needs of all users as well as through the requirement for all developments to provide inclusive access. The safety of users is a consideration throughout, as are opportunities to design out crime.
- The policy has potential for positive impacts for the objectives relating to greenhouse gas emissions, improving access, and contributing towards economic development. Policy could lead to a reduction in transport-based greenhouse gas emissions through reduced car-use, should improve access to services and facilities through improved pedestrian, cycling and public transport network, and should help to improve the local economy through reduced congestion and improved access to employment opportunities.
- The impacts of the policy on improving access to open space and the SDNP are uncertain and would be largely dependent on the location of development.

### Recommendations

- There are no recommendations or requirements for mitigation

**CPP2 Policy Appraisal: DM34 Transport Interchanges**

**Options Stage:**

**Park & Ride, Coach and Lorry Park:**

- 4) General criteria based policy in support of developments
- 5) Specific site allocations
- 6) No policy

**This policy is considered to be linked to option 1 which was the preferred approach.**

**Assumptions/Explanations**

- No allocation for any of the types of interchanges have been put forward, however the policy shows clear support for these types of development if they come forward.
- Assume that these types of development would come forward: park & ride, coach park, lorry park and freight consolidation centres.
- Park & Ride associated with this policy would be new dedicated development, rather than an informal park & ride scheme that uses existing car-parks.
- Assume that generic developmental impacts of transport interchanges will be addressed.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	It is considered highly unlikely that any type of interchange would be built on a site with nature conservation importance. Impacts are considered to be neutral. Generic development impacts on biodiversity would be addressed through CP10.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	0	It is considered highly unlikely that any type of interchange would be built on designated open space. Impacts are considered to be neutral.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The locations of these types of developments could be on the periphery of the city and could be located within the setting of the SDNP potentially having adverse landscape impacts. The policy point c) requires development to incorporate design and landscape measures to minimise visual impact. This should ensure that the impact is positive on this objective, however	D	P

				<p>could be strengthened to refer to the SDNP.</p> <p><b>Recommendation</b></p> <p>The policy could be strengthened further by including a specific reference to the SDNP, particularly given the likely location of these types of development. E.g. appropriate design and landscape measures are incorporated to minimise the visual and amenity impact, <u>particularly on areas of landscape importance and their setting, including the setting of South Downs National Park</u></p>		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	<p>Any type of development could have adverse visual impacts on heritage assets, and transport movements can also adversely affect heritage assets. However, the policy point c) requires development to incorporate design and landscape measures to minimise visual impact. In addition, policy point b) requires travel through Conservation Areas to be minimised. These policy requirements should result in a positive impact on this objective by ensuring visual impacts are minimised and travel through Conservation Areas is minimised.</p> <p>In addition, there is some evidence which suggests that P&amp;R can have a positive effect on the historic cores of towns and cities, due to a reduction in traffic in these locations.</p>	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+?	-/+?	-/+?	<p>Evidence on the effectiveness of Park and Ride schemes suggests that although park &amp; ride can reduce congestion in town/city centre locations, that it does not result in an overall reduction in journeys made, and rather diverts journeys to other locations resulting in a displacement of issues. It can also result in a transfer of journeys that would normally be made on public transport (e.g. if bus-based park &amp; ride offers better/cheaper service than existing public transport).</p> <p>Any benefits resulting from reductions in congestion within the city-centre in the short-term could be lost in the longer-term as freed up road space and city centre parking places makes driving into the city centre more attractive, unless an equivalent reduction in city centre parking places takes place. It is noted that the supporting text refers to the need for a complementary town centre parking strategy.</p> <p>Provision of facilities for coach parking may result in increased availability of</p>	D	P

				<p>coach travel, which would have positive impacts for this objective.</p> <p>Freight consolidation centres could have a positive impact on reducing the amount of journeys made within the city centre, provided that it resulted in the capacity of vehicles delivering freight from the management centre into the city being maximised.</p> <p>Lorry parking is not considered to have any impact on this objective.</p> <p>Overall impacts are considered to be mixed and uncertain.</p> <p><b>Recommendation/mitigation</b></p> <p>It is noted that policy points b) requires that travel through residential areas is minimised, d) requires there to be no unacceptable impact on local and strategic road network and f) requires sites to be located in a location on or close to a radial route into the city. These policy points should help to maximise the effectiveness of park and ride and reduce the risk of some of the potential adverse impacts including displacement issues, as well as maximise the effectiveness of the other types of interchanges.</p> <p>The supporting text also refers to the need for consideration of impacts on traffic flows and city centre parking provision, which may include consideration of a reduction in city centre parking spaces.</p>		
6. To improve air and noise quality	+	+	+?	<p>Freight consolidation centres/management is a measure referred to in the Strategic Transport Assessment 2013 (and update 2014) that is likely to bring about air quality benefits within the urban core, through the potential reduction in freight vehicles through maximising capacity, and also through the potential reduction in heavier, more polluting vehicles in the city centre. Park &amp; ride could also result in air quality improvements within the AQMA if it results in reduced congestion in the city centre and other locations within the AQMA. However it is noted that some of the worst case locations for air quality are not accessible by private-car, and therefore P&amp;R would not have any impact on these locations. Should city centre congestion increase again in the longer term due to freed up road space, then air quality benefits may reduce, although this is fairly uncertain.</p> <p>The supporting text refers to the need for consideration of impacts on traffic flows and city centre parking provision, which may include consideration of a reduction in city centre parking spaces.</p>	D	P

7. To improve water quality (ecological, chemical and quantity status)	-?	-?	-?	<p>However interchanges could result in increased surface water flooding/run-off, potentially impacting on water quality, if the development of the site involved change from a natural to a more urbanised form.</p> <p><b>Mitigation</b> Mitigation considered to be provided by CPP1 Flood Risk and emerging CPP2 policy on SUDS.</p>	I	P
8. To reduce the risk from all sources of flooding to and from development	-?	-?	-?	<p>As described under objective 7 above, transport interchanges could result in an increased risk of surface water flooding, due to the potential to increase impermeable surfaces. However this would depend on the nature and form of the site developed and is therefore also fairly uncertain.</p> <p><b>Recommendation/Mitigation</b> Mitigation considered to be provided by CPP1 Flood Risk and emerging CPP2 policy on SUDS.</p>	I	P
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	<p>Park &amp; Ride is considered unlikely to result in an overall reduction in transport-based carbon emissions as evidence suggests that it does not result in an overall reduction in transport movements.</p> <p>Freight consolidation / management may result in increased efficiency of vehicles, which could result in a reduction in transport-based carbon emissions.</p> <p>Provision of coach parking may result in an increase in coach trips, with potential for some car journeys to transfer to this mode of transport, also having potential to reduce transport-based carbon emissions.</p> <p>Overall impacts could be positive.</p>	I	P
10. To increase the city's resilience and ability to adapt to climate change	-?	-?	-?	<p>As described under objective 8, transport interchanges could result in an increased risk of surface water flooding due to the potential to increase impermeable surfaces. This may hinder the city's ability to adapt to climate change, although depends on the nature and form of the site.</p> <p><b>Recommendation/Mitigation</b> Mitigation considered to be provided by CPP1 Flood Risk and emerging CPP2 policy on SUDS.</p>	I	P
11. To improve soil quality	?	?	?	<p>Development of transport interchanges could result in remediation of contaminated land, depending on the site developed and is therefore uncertain.</p>	D	P

				<p><b>Recommendation</b> Policy could be strengthened if it includes criteria that supported or prioritised development coming forward on brownfield sites or sites with contamination issues to maximise beneficial effects.</p>		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	Park & Ride could lead to improved access into the city centre from certain locations, having positive effects on this objective. It may improve access for communities living in close proximity to the park and ride site who may be able to make use of its service (e.g. potential for more direct bus services into the city centre).	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>Based on the assumption that Park &amp; Ride would reduce city centre congestion, this could lead to improvements in air quality in the city centre, as well as other locations within the AQMA, where air quality poses a risk to health. However it is noted that some of the worst case locations for air quality in the city centre are not currently accessible by private car, and therefore park and ride may not have any impact on air quality in these locations.</p> <p>There may be some amenity impacts on residents/communities living in close proximity to any of the sites, particularly if they result in an increase in traffic in these locations. However this issue is considered to be addressed through policy points b) which requires travel through residential areas to be minimised; c) which requires visual amenity impacts to be minimised; and d) which requires there to be no unacceptable impact on the local/strategic road network.</p> <p>Freight consolidation centres/management is a measure referred to in the Strategic Transport Assessment 2013 (and update 2014) that is likely to bring about air quality benefits within the urban core, through the potential reduction in freight vehicles through maximising capacity, and also through the potential reduction in heavier, more polluting vehicles in the city centre. There may also be positive health impacts, such as those relating to increased access to services. Overall, impacts should be positive for health.</p>	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Volume of traffic has a direct link with road safety. Both Park and Ride, and Freight Management should result in reduced congestion/journeys within the city centre and this would have a positive impact on road safety.	D	P



				In addition, it is noted that the policy point e) requires that the sites are safe and secure, which should help support community safety.		
18. To increase equality and social inclusion	+	+	+	The policy considers the needs of people with protected characteristics, particularly those with mobility difficulties under point e). Impacts should therefore be positive. In addition, policy point g) requires complimentary measures to be installed. This could e.g. result in provision of seating facilities, which would be beneficial for all people, but particularly older and younger people.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	A good transport system is integral to supporting economic growth, and congestion can have an adverse impact on economic development. The policy is considered to have a positive impact on this objective through increasing opportunities to access the city and potential improvements to traffic flow that will result from park and ride, specialist parking provision and freight management. The policy is also considered to be flexible by allowing the market to decide where sites should be located. Impacts should be positive.	I	P

### Overall Summary

- The policy has potential to have positive impacts for the objectives relating to the SDNP, historic built environment, air quality, greenhouse gas emissions, soil quality, access, health, community safety, equality, and economic development. The policy should help to protect the SDNP and the historic built environment through the requirement to minimise visual impacts and through the requirement to minimise travel through Conservation Areas. Air quality could be improved in central areas, particularly within the AQMA through both park & ride and freight management, although may deteriorate again in the longer term if freed up road and parking spaces is taken up by cars again. Coach-parking and freight management could help to reduce transport based green-house gas emissions, although park and ride is unlikely to impact on this objective as this is likely to result in a displacement rather than a reduction in car-movements. The policy could result in remediation of contaminated sites, depending on the site developed, therefore improving soil quality. Park & ride could help to improve access, particularly for those in close proximity to sites. The policy could improve health, through the potential improvements to air quality and access and the policy is considered to address the potential for amenity impacts. The policy could lead to a reduction in city centre traffic, therefore contributing towards improving road safety in this location and contributes positively towards economic development. The policy is considered to address the needs of people with certain protected characteristics, having positive impacts for equalities.
- The policy has potential to have mixed positive and negative impacts for objectives relating to reducing the need to travel by car and encouraging sustainable travel. Certain elements of the policy should help to reduce congestion and promote sustainable travel, such as delivery of freight management

centres and coach parking facilities. However, although park and ride may help to reduce city centre congestion, park and ride itself has been shown to result only in a displacement of car journeys rather than an overall reduction.

- Some of the potential adverse impacts are fairly uncertain and will depend of the location and type of site that is developed. For instance, there could be adverse impacts on objectives for water quality, flood risk and climate change adaptation. Development could be located on sites of a natural form, and therefore the urbanisation of these sites could increase the risk of surface water flood risk, having potential for adverse impacts on water quality, flood risk and climate change adaptation.

### **Recommendations / Mitigation**

- The SA made some recommendations as follows, however these were not included in a revised policy as it was considered that these were addressed through other adopted policy or were not considered appropriate.
- The policy could be strengthened further by including a specific reference to the SDNP. E.g. c) appropriate design and landscape measures are incorporated to minimise the visual and amenity impact, particularly on areas of landscape importance and their setting, including the setting of South Downs National Park;
- Policy could include criteria that supported or prioritised development coming forward on brownfield sites or sites with contamination issues to maximise beneficial effects on protecting water quality/reducing flood risk/improving soil quality objectives.
- The supporting text could have further information / justification on need for and potential benefits of freight consolidation.

Mitigation in relation to water quality, flood risk and climate change adaptation objectives considered to be provided by CPP1 Flood Risk and emerging CPP2 policy on SUDS.

### **CPP2 Policy Appraisal: DM35 Travel Plans & Transport Assessments**

#### **Options Stage**

#### **Travel Plans**

4. No additional policy – rely on CPP1 Policy CP9 (para 2c: major development required to submit a TA and implement agreed Travel Plans)
5. Policy regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans
6. Guidance (e.g. SPD) regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans

This policy is considered to be linked to option 2 although it is noted that the policy does not include information on thresholds and content for Transport Assessments, Transport Plans and Transport Statements, instead referring to Department of Transport published guidance which provides guidance on these matters.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	Policy should have significant positive effects on this objective. Policy requires TA, TS or TP for developments which are likely to generate a significant amount of travel, in accordance with published guidance (NPPF, NPPG and DoT, which provides guidance on thresholds or circumstances where TA/TS/TP may be required). Policy also requires developments which require a TA to also consider the cumulative effects from other committed developments. Policy also requires all developments to include measures to minimise the need to travel by car. Policy should help to reduce or minimise adverse transport impacts associated with a development, should help to bring about measures which improve sustainable and active travel choice, help to minimise car use and have citywide benefits in terms of contributing towards reducing congestion and other transport based issues.	D	P
6. To improve air and noise quality	++	++	++	As described under Objective 5, the policy should help to reduce or minimise adverse transport impacts associated with a development, should help to bring about measures which improve sustainable travel choice, help to minimise car use and have citywide benefits in terms of contributing towards reducing congestion and other transport based issues including air and noise quality issues. In addition, following an SA recommendation on an early version of the policy, the policy was amended to include an additional requirement relating to the need for development situated within or adjacent to an AQMA to submit a TA. This is considered to strengthen the policy further.	D	P
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	The policy should result in measures which reduce car use and promote sustainable forms of travel, which will help to reduce transport based carbon emissions.	I	P
13. To make the best use of land	+	+	+	Implementation of travel plans can reduce the amount of land required for	I	P

available				parking provision which would have a positive effect on this objective.		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy should result in measures which reduce car use and promote sustainable forms of travel, as well as potentially leading to improvements in sustainable access to services and facilities.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	The policy should help to reduce or minimise adverse transport impacts associated with a development , should help to bring about measures which improve sustainable and active travel choice, help to reduce car use and have citywide benefits in terms of contributing towards reducing congestion and other transport based issues including air and noise quality issues. The policy will therefore have various health benefits through active travel, through the potential to tackle air and noise quality issues, and through the potential to reduce congestion which is linked to road safety issues.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Congestion and the amount of vehicles on the road are directly related to road safety. The policy should help to reduce or minimise adverse transport impacts and should help to reduce car use and congestion, therefore contributing positively towards this objective.	I	P
18. To increase equality and social inclusion	+?	+?	+?	Lack of transport options and access to services can result in social exclusion. The policy could have an indirect positive effect on this objective through the potential to increase opportunities for travel that is accessible to all. However this is uncertain as will depend on take up by communities.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Congestion has a direct impact on the economy. The policy should help result in measures which contribute towards reducing congestion and other transport based issues, and this will have positive impacts for economic development.	I	P

### Overall Summary

- The policy has potential for significant positive impacts on the objectives relating to reducing the need to travel by car, improving air and noise quality and improving health. The requirement for Transport Assessments, Transport Statements and/or Travel Plans for some developments, as well as the requirement for all developments to include measures that help to minimise car journeys should help to reduce or minimise adverse transport impacts associated with a development, should help to bring about measures which improve sustainable and active travel choice, should help to minimise car use and have citywide benefits in terms of contributing towards reducing congestion and other transport based issues, including air and noise quality issues, all of which will also have benefits for health.

- The policy has potential for positive impacts on the objectives relating to reducing greenhouse gas emissions, making the best use of land, improving access, improving community safety and economic development. Policy should lead to a transport-based greenhouse gas emissions being minimised, could help to make better use of sites within a development through minimising parking, and could help to improve road safety and the local economy through reduced congestion.
- The policy has potential for positive uncertain impacts on the objective relating to equalities/social inclusion. Policy should lead to sustainable transport measures which are more socially inclusive than the car, although this will be dependent on take-up by effected communities.

### Recommendation

- The initial SA of an earlier draft of the policy noted that the DoT guidance on Transport Assessments (Appendix B) (now withdrawn) suggests that any development located within or adjacent to an AQMA should have a Transport Assessment. The SA recommended that this could be referred to in the policy or supporting text to further strengthen the policy. This recommendation was implemented through the addition of a policy requirement.
- There are no further recommendations or requirements for mitigation.

### CPP2 Policy Appraisal: DM36 Parking and Servicing

#### Options Stage

Option 1) No additional policy – reply on CPP1 Policy CP9 and guidance in the Parking Standards SPD

Option 2) Policy regarding the parking and servicing arrangements required to support new development (with standards from SPD set out in an Appendix)

**This policy is considered to be linked to option 2**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	The city suffers from transport related issues including congestion particularly at peak and holiday times. The policy refers to an Appendix which sets out maximum car parking standards for all uses which vary according to whether the site is located within central areas, on key public transport corridors, or in outlying areas. Lower amounts of parking are	D	P

				<p>permitted in central areas where public transport is easily accessible compared to outer areas where a greater amount is permitted where public transport is less accessible. The Appendix also provides guidance for car free housing, and sets minimum standards for cycle parking, disabled parking, motorcycle parking and servicing. In addition, the policy requires development situated in locations where there is no on-street car-parking capacity to support the extra demand created by the new development to be “permit-free” meaning that future residents will not be able to apply for a parking permit (within a CPZ).</p> <p>The standards referred to in the policy should have significant positive impacts on this objective as could help to influence car ownership and travel choice through reduced car parking availability, promotes sustainable travel through increased sustainable travel infrastructure, particularly in major developments where they are required to include infrastructure that improves accessibility such as cycle hire, as well as promotes low-carbon forms of transport.</p>		
6. To improve air and noise quality	++	++	++	<p>Air and noise pollution are issues in certain parts of the city with an AQMA covering certain areas. Both forms of pollution are transport-based. Diesel, older and heavier vehicles are the key contributors to poor air quality in the city, combined with narrow streetscapes, however cars also contribute to poor air quality.</p> <p>The AQMA is mainly located within the “central areas” and “key public transport corridors” zones of the Appendix which permit a lower amount of car parking than the outer areas. The policy could lead to a reduction in congestion or car journeys made within these two areas and this would be beneficial for air quality. In addition, maximum car parking standards for uses located in outer areas that are destination uses may also influence travel choice to these areas, also benefiting air quality in the “outer” zone. The policy also requires new development to include infrastructure for low-emission vehicles, e.g. charging points. Electric vehicles can have localised air quality benefits.</p> <p>Impacts considered to be significantly positive.</p>	I	P
9. To reduce emissions of greenhouse	+	+	+	The policy sets maximum standards for car parking and minimum standards	I	P

gases that cause climate change				for cycle parking which may help to influence car ownership and travel choice. Electric vehicles can also help to reduce transport based carbon emissions if the source of the power is low or zero carbon. The policy could therefore help to reduce or minimise transport based carbon emissions having a positive impact on this objective.		
13. To make the best use of land available	+	+	+	Implementation of maximum parking standards should help to minimise land-take required for parking provision. This could make more land available for other uses and would be a better use of land given the constrained nature of the city and competing land requirements.	I	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The Appendix sets out car parking standards for various uses, including e.g. Health, with 1 space per consulting room in central and transport corridor zones permitted, and 2 spaces per consulting room in outer area zone permitted. It also sets standards for other uses such as hospitals, where people may need to travel by car due to health reasons, and other uses, including e.g. retail and leisure. The availability of a certain amount of parking, should ensure that access is maintained for those who need or wish to drive to various services and facilities. Minimum cycle parking for all forms of development could help increase access for those who cycle and minimum disabled parking requirements should ensure adequate parking provision for disabled people is provided at all developments. Policy requirements for all major development to include infrastructure that improves access to certain schemes, such as cycle or car clubs, should also help to improve access to sustainable travel.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy could have various benefits for health, as could lead to improvements in air quality, could encourage or facilitate cycling and therefore promote active travel. The policy also ensures that access to certain services, including health services, is maintained.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	This option could influence car ownership and travel choice and ultimately reduce congestion. As congestion and the amount of vehicles on the road are directly related to road safety, any reduction in journeys being made by car would have road safety benefits	I	P
18. To increase equality and social	+	+	+	The policy considers the needs of disabled people, with specific reference to	D	P

inclusion				<p>ensuring parking provision for “blue-badge” holders is provided for in accordance with the standards in the Appendix. It also provides additional requirements that should ensure disabled parking spaces are sited in the most suitable and appropriate location to enable access to the development.</p> <p>In addition, the policy also requires major developments to include infrastructure that improve equality of access to travel. As lack of transport can be a contributor towards social exclusion, this helps to promote social inclusion. Impacts considered to be positive as the policy should ensure that the parking requirements of disabled people are met and help improve access to sustainable travel for all.</p>		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	<p>Congestion has a direct impact on the economy. This option could lead to reduced congestion through the potential for maximum car-parking standards to influence travel choice, having a positive effect on this objective.</p> <p>The limit on the amount of car-parking provided is not considered to be of detriment to the economy. The standards still permit some car-parking for destination uses, e.g. retail or leisure, which are strongly linked to the local economy, particularly in outer areas where there is less public transport provision. In addition, the policy will facilitate access to these uses via sustainable forms of transport.</p> <p>The policy should result in sufficient space for large vehicles to service developments, e.g. deliveries etc, which should also help businesses to operate effectively.</p>	I	P

## Summary

- The policy has potential for significant positive impacts for the objectives relating to reducing the need to travel and improving air quality. The policy may help to influence car ownership and travel choice, potentially helping to reduce congestion, facilitate sustainable and low-carbon forms of transport, and minimise air and noise pollution.
- The policy has potential for positive impacts for the objectives relating to reducing greenhouse gas emissions, making the best use of land, improving access, improving health, improving community safety, increasing equalities and economic development. The policy could lead to a reduction in transport-



based carbon emissions due to the potential to influence mode of travel and also through incorporation of electric vehicle infrastructure; should help to reduce the land-take associated with parking; will enable access to services via sustainable transport and maintain provision for those who need/wish to travel by car; could help to improve health through improvements to air quality and facilitation of active travel; could help improve road safety through reduced congestion; should help to meet the parking needs of disabled people supporting equalities and also could also reduce the risk of transport based social exclusion in major developments; and could support economic development through the potential to reduce congestion and through provision of parking and access to destination uses which form part of the local economy.

### **Recommendation and Mitigation**

- There are no recommendations or requirements for mitigation.

## Environment & Energy

### CPP2 Policy Appraisal: DM37 Green Infrastructure and Nature Conservation

#### Options Stage

- Option 1) No policy framework in CPP2 to address and protect Green Infrastructure and nature conservation but rely on NPPF and high level policy CP10 Biodiversity, CP16 Open Space, CP17 Sports Provision and detailed SPD (SPD11 and SPD06).
- Option 2) One criteria based policy addressing the different nature conservation designations, species protection and Green Infrastructure
- Option 3) Have a number of policies in CPP2 so that there is one for each of the different designations, one for species protection and also one for Green Infrastructure

**This policy is considered to be linked to Option 2.**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	++	++	++	This is the key objective of relevance to this topic area. Policy should lead to protection and enhancement of species and habitats including the NIA, protected and notable species, ancient woodland, aged/veteran trees, protected trees, and the Elm Collection. In addition the policy should lead to the protection and enhancement of designated sites including SAC, SSSI, NNR, LNR, LWS and LGS. The policy should lead to development that safeguards or contributes to the network of Green Infrastructure and should help retain ecosystem services. The policy clearly sets out that development will only be permitted within designated sites when there are no alternative sites and where development does not undermine the objectives of the designation. The policy clearly sets out that any proposals which may have impacts on the site must include mitigation as well as measures to provide net gains, improve public understanding and funded management plans. Proposals will not be permitted if they cause demonstrable harm. Overall the policy should have significant positive impacts on this objective.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	++	++	++	The policy should lead to the protection of the NIA, protected and notable habitats and designated sites of nature conservation importance which includes the SAC, SSSI, NNR, LNR, LWS and LGS. Most if not all of these designations also have an open space designation, e.g. natural/semi-natural	I	P

				open space, and therefore protection of them for biodiversity reasons will also indirectly protect their open space function. Policy should have significant positive impacts on this objective.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	As discussed in the policy, the Castle Hill SAC (which is also a NNR and SSSI) lies within the city's administrative boundary, however outside the City Plan area as it is situated within the SDNP. In addition, there are other areas that are within the SDNP of biodiversity importance such as Wild Park proposed LNR and Bevendean Down proposed LNR. Although this policy will not apply within the SDNP, it will apply to development which could directly or indirectly affect these sites which are situated within the SDNP and may contribute towards protecting its landscape value. Therefore the policy should have an indirect positive impact on this objective.	I	P
6. To improve air and noise quality	+	+	+	Sites of a natural form, as well as trees and other forms of green infrastructure play an important role in regulating the environment, including absorbing air pollutants and helping with noise nuisance. The policy recognises the importance of green infrastructure in relation to retaining ecosystem services and should lead to the protection of the green infrastructure network which performs various functions. The policy should therefore have indirect positive impacts on this objective.	I	P
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	Sites of a natural form, as well as trees and other forms of green infrastructure play an important role in regulating the environment, including absorbing water and helping to reduce flood risk. The policy recognises the importance of green infrastructure in relation to retaining ecosystem services and should lead to the protection of the green infrastructure network which performs various functions. The policy should therefore have indirect positive impacts on this objective.	I	P
8. To reduce the risk from all sources of flooding to and from development	+	+	+	Sites of a natural form, as well as trees and other forms of green infrastructure play an important role in regulating the environment, including absorbing water and helping to reduce flood risk. The policy recognises the importance of green infrastructure in relation to retaining ecosystem services and should lead to the protection of the green infrastructure network which performs various functions. The policy should therefore have indirect positive impacts on this objective.	I	P

9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	The policy requires developments within nature conservations to achieve greater reductions in CO2 emissions than set out in CPP1 CP8 Sustainable Buildings. This will have a positive impact on this objective.	D	P
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	Sites of a natural form, as well as trees and other forms of green infrastructure play an important role in regulating the environment, including absorbing water, helping to reduce flood risk and maintaining urban temperatures. Temperatures and risk of flooding will increase with climate change, therefore the natural environment will play an essential role in climate change adaption. The policy recognises the importance of green infrastructure in relation to retaining ecosystem services and should lead to the protection of the green infrastructure network which performs various functions. The policy should therefore have indirect positive impacts on this objective.	I	P
13. To make the best use of land available	+	+	+	Although this policy is mainly concerned with nature conservation, it recognises the importance of the green infrastructure network for delivery of ecosystem services. The policy requires development to retain ecosystem services and this should therefore have positive impacts on this objective as will help to make the best use of land available.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Access to the natural environment and green and open spaces have documented benefits for both physical and mental health and well-being. The policy should lead to the protection of the green infrastructure network, which provides opportunities for physical activity, as well as helps to support a healthy environment by minimising environmental pollution, and should therefore have positive impacts on this objective. The policy also requires developments to achieve greater reductions in CO2 emissions; this could lead to more energy efficient homes than help to address the risks of fuel poverty.	I	P

### Summary

- As expected, the policy should have significant positive impacts on the biodiversity objective. The policy should lead to the protection and potential enhancement of a range of biodiversity including the NIA, protected and notable species which includes BAP species, important trees and all designated nature conservation sites. The policy should ensure that both non-designated and designated sites are protected and provides clear requirements regarding mitigation. The policy recognises the importance of the ecosystem services that green infrastructure provides.

- The policy should also have significant positive impacts on the open space objective. Many sites with a nature conservation designation, as well as those without a nature conservation designation but with biodiversity importance are also a designated open space, in particular natural and semi-natural open space. Protection for biodiversity purposes will therefore also lead to the protection of the open space.
- The policy should also have a range of positive impacts on objectives that relate to the ecosystem services provided by green infrastructure. This includes absorbing air pollutants, reducing noise, absorbing water, reducing flood risk and maintaining urban temperatures, having positive impacts for the objectives for air quality, water quality, flood risk, and climate change adaptation.
- The policy should also have additional positive impacts by helping to mitigate against climate change, as requires developments within nature conservation designations to achieve greater reductions in CO2 emissions, should help to make the best use of land available, through the requirement to retain ecosystem services, and could positively impact upon the SDNP through the protection of sites of nature conservation importance located within the SDNP that may also contribute to its landscape value.
- The policy should also have positive impacts for health, through protection of areas that provide opportunities for physical activity, through the improvement in environmental quality and due to the link between accessing the natural environment and good mental health and well-being.

#### Recommendations and Mitigation

- There are no further recommendations or requirements for mitigation.

#### CPP2 Policy Appraisal: DM38 Local Green Space (LGS) and Gateways

##### Options Stage

Option 1) No policy framework to designate Local Green Space (LGS) sites in the City Plan

Option 2) Policy designating the four urban fringe sites; Hollingbury Park, Three Cornered Copse, Ladies' Mile and Benfield Valley; which received significant support from respondents to the City Plan Part Two Scoping Paper.

Option 3) Policy designating all the sites promoted by more than one individual in response to the City Plan Part Two Scoping Paper.

**This policy is considered to be linked to option 2.**

##### Assumptions

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind	Temp/Perm
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					(D/I)	(T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	All four sites designated as LGS contain some natural/semi-natural open space, and/or are an SNCI (LWS), and/or are a proposed or designated Local Nature Reserve, and therefore all have some kind of ecological value, as well as acting as wildlife corridors coming in from the SDNP. The LGS designation may therefore lead to greater consideration or protection of the areas of ecological value within the sites having positive impacts on this objective.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	++	++	++	The designations should provide greater recognition of the importance of the sites as open space, and may lead to further improvements in the open space offer on these sites.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	All of the four sites designated are on the urban fringe and therefore either directly adjoin, or are in close proximity and could provide a link to the SDNP. The LGS designation may provide the opportunity to enhance the open spaces as gateways to the SDNP, having positive impacts on this objective.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Between them, the LGS contain a listed building, two Conservation Area and a Scheduled Monument. In addition, one is in the setting of a SM. The open spaces may form a part of the designations, or their settings, and therefore the LGS designation may lead to greater consideration, protection or understanding of these heritage assets, having positive impacts on this objective.	I	P
8. To reduce the risk from all sources of flooding to and from development	+	+	+	Open space performs a variety of natural functions including the absorption of water, which can help to reduce flood risk. The LGS should help to protect these open spaces and this will have positive impacts on this objective. The LGS designation may also increase opportunities to improve the open spaces in relation to providing flood risk solutions, such as SUDS.	I	P
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	Open space performs a variety of natural functions including helping to maintain urban temperatures and absorbing water, which can help to reduce flood risk, and therefore plays an important role in increasing resilience to climate change. Impacts should be positive.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	?	?	?	It is unknown what impacts the policy will have on housing delivery. The Local Green Space designation does protect these spaces as a "green space", however the supporting text also refers to two of the sites having housing potential, which suggests that development is anticipated to come forward in		

				these locations regardless of the designation.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Access to open and green space contributes significantly towards physical health and well-being. The Local Green Space designations should ensure that the sites continue to provide opportunities for activity and recreation, supporting health.	I	P

### Overall summary

- The policy should have significant positive impacts for the objectives for open space. The policy should provide greater recognition of the importance of the open space, and may lead to improvements in the open space offer.
- The policy should have positive impacts for the objectives for biodiversity, SDNP, heritage assets, flood risk, climate change adaptation and health. All the sites designated contain elements or natural/semi-natural open space and some have an ecological designation, therefore the LGS designation may lead to greater consideration of ecological features of the sites. All sites are in close proximity to the SDNP and could act as potential gateways or result in improved links to the SDNP. Some sites contain or may be within the setting of heritage assets and therefore could result in protection or greater consideration of the assets. Protection of open space has indirect benefits due to their environmental function such as absorption of water, reduction of flood risk, and maintenance of urban temperatures. Access to open space contributes towards good physical health and mental wellbeing.
- The policy has uncertain impacts on the objective for housing delivery, as although the sites will be protected as a green space through the LGS designation, some of the sites have been identified as having potential for housing.

### Recommendations and Mitigation

- There are no further recommendations or requirements for mitigation.

### CPP2 Policy Appraisal: DM39 Development within the Seafront

#### Options Stage

- Option 1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)
- Option 2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated
- Option 3) Develop further guidance on development within the seafront through a masterplan/ SPD

**This policy is considered to be linked to option 2, however the policy does not contain site allocations as these will form a stand-alone policy**

## Assumptions

- Assume generic impacts of development will be mitigated (e.g. impacts on heritage assets, increasing water consumption etc). This assessment focuses on the specific impacts of development in the seafront location.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	There are areas of ecological value along the seafront and coast including SNClS and the MCZ. Development along the seafront could pose the risk of having adverse impacts upon these designations, depending on the location and scale of development, however the policy specifies that proposals should be designed to avoid adverse impacts in accordance with the emerging CPP2 policy on Green Infrastructure and Nature Conservation. Impacts should be therefore be positive.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The policy recognises the importance of the seafront, beach and sea as a form of open space, through requiring proposals to safeguard the importance of the seafront and beach as an open space resource. The policy should also facilitate access to these areas through requiring proposals to maintain and enhance public access to and along the coast. This should have a positive impact on this objective.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-	-	-	There are several Conservation Areas that take in the seafront, as well as listed building. Development along the seafront could have adverse impacts on these designations. Mitigation Provided by policy CP15 Heritage and also emerging policies on heritage assets.		
8. To reduce the risk from all sources of flooding to and from development	++	++	++	The shingle beaches, timber groynes, Hove sea-wall and Undercliff Walk, form part of the defences that protect the city from tidal flooding. The policy requires any development that requires coastal defences to accord with the relevant Shoreline Management Plan to ensure that city/development remains defended, and to ensure that they are not of detriment to any proposed coastal protection works. This should ensure	D	P



				<p>that development maintains or improves coastal defences and reduces vulnerability to flood risk.</p> <p>Some of the shingle beach areas of the seafront, as well as some areas around Shoreham Harbour are located within tidal flood-zone 3b (functional floodplain). In addition, some areas around the harbour, Hove lagoon and also the marina are within tidal flood-zone 3a (high risk of tidal flooding). There is also little differentiation between the areas located within flood-zone 3 and 2 (medium risk) due to the steep rise of land along the coastline. Therefore any development in the seafront location is vulnerable to tidal flooding. The policy sets a presumption against development on the shingle, with the exception of small scale facilities such as toilets or changing room, and therefore helps to avoid development situated within an area of high risk, having positive impacts on this objective. In addition, the policy requires safety measures to be included in development that requires coastal defences, such as escape routes, to help protect users from any future flooding event.</p>		
10. To increase the city's resilience and ability to adapt to climate change	++	++	++	<p>Climate change is anticipated to result in a gradual rise in sea level, as well as increased frequency of severe storms. This could result in sea defences being overtopped or damaged. The policy should result in development that can adapt to climate change, e.g. through the use of climate resilient materials and requirements for windows that are capable of withstanding severe storms. The policy should also result in development that is safe to the potential impacts of climate change, e.g. through requirements to include escape routes in case of flooding events.</p> <p>In cases where development needs coastal defences, the policy includes criteria which should ensure that any defences meet the requirements of the Shoreline Management Plan and are not detrimental to any proposed coastal defence works. This should also help to ensure development is resilient to the potential impacts of climate change by helping to maintain or improve coastal defences.</p>	D	P
13. To make the best use of land available	+	+	+	Development along the seafront could help to regenerate certain areas which would contribute positively towards this objective.	I	P
15. To improve the range, quality and	+	+	+	The policy should lead to enhanced access to the seafront and to sea-based	D	P

accessibility of services and facilities.				activities and should therefore contribute positively towards this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should lead to improved access to the seafront, its open spaces, the beach and to sea-based activity, and therefore potentially facilitate access to physical activity.	I	P
18. To increase equality and social inclusion	+	+	+	The policy should lead to improved access to the seafront, its open spaces, the beach and to sea-based activity. The supporting text particularly refers to improving access for disabled people, people who use wheelchairs, younger and older people and would therefore help to meet the needs of people with certain protected characteristics.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The seafront is a key destination for residents and visitors and contains some important development sites. The policy will help to safeguard the importance of the beach and maintain access to the sea, as well as ensure developments remain safe. The policy should help contribute towards maintaining and supporting tourism-related economic development.	I	P

### Overall Summary

- The policy has potential to have significant positive impacts for the objectives for reducing flood risk and increasing climate change resilience. The policy should lead to improvements in coastal defences where needed, should help to prevent against flood risk through directing most seafront development away from area at highest risk of flooding, and should also result in development that is safe and prepared for the possible consequences of climate change, for example severe storms and flooding.
- The policy has potential to have positive impacts on the objectives for biodiversity, open space, access, health, equalities, best use of land and economic development. The policy should support the protection of coastal and marine biodiversity and should help to safeguard the open spaces of the beach and seafront. The policy should help to improve access to the beach for all people, including those with protected characteristics and will potentially facilitate physical activity. The policy may help to regenerate certain areas of the seafront and should also contribute towards supporting tourism-based economic activity.
- The policy could have adverse impacts on heritage assets, due to the range of heritage designations that are located along the seafront.

### Recommendations and Mitigation

- There are no recommendations
- Mitigation is addressed through CP15 Heritage and emerging CPP2 policies on heritage assets.

**CPP2 Policy Appraisal: DM40 Protection of Environment and Health - Pollution & Nuisance**

**Options Stage**

- Option 1) No specific policy. Rely on NPPF (paras 109-125) and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 and provide detail in SPD
- Option 2) Have a single policy in CPP2 just covering pollution and nuisance control
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail

*Pollution and nuisance include: noise, vibration, smell/odour, light, heat, dust, dirt, PM10, fumes, gases, steam, radiation, smoke, invasive non-native species/diseases (including Japanese knotweed, Himalayan Balsam and Dutch Elm Disease), electromagnetism, other polluting and nuisance emissions, and other forms of disturbance.*

**This policy is considered to be linked to Option 2.**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The policy should ensure that new development does not give rise to any type of pollution that would cause unacceptable harm to biodiversity, and also requires that proposals are designed to alleviate any existing problems. For development which may cause or be affected by pollution, the policy requires any pollution and nuisance to be minimised and to include measures that will help resolve existing/potential problems. The policy is considered to have positive impacts on this objective.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The policy should ensure that new development does not give rise to any form of pollution that would cause unacceptable harm, which includes light pollution. In cases where development may cause pollution, the policy requires pollution to be minimised and also requires that cumulative effects are considered. The policy has a specific requirement with regards to lighting and requires that lighting does not cause unacceptable impacts on the night sky and the SDNP Dark Sky Reserve designation. Policy should therefore limit	D	P

				the impact of light pollution on the SDNP and have a positive impact on this objective.		
6. To improve air and noise quality	+	+	+	<p>The policy should ensure that new development does not give rise to any form of pollution that would cause unacceptable harm, which includes air and noise pollution. In cases where development may cause pollution, the policy requires pollution to be minimised, to include measures that will help resolve existing/potential problems, and also requires that cumulative effects are considered.</p> <p>The policy has specific references which should help improve air quality including the requirement for development to support implementation of Air Quality Action Plans, to provide air quality impact assessments to consider the impact of the development on air pollution as well as the exposure of future and existing residents, and to have a positive impact on air quality when located within or close to an AQMA.</p> <p>The policy should therefore have positive impacts on this objective.</p>	D	P
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>The policy should ensure that new development does not give rise to any form of pollution that would cause unacceptable harm to the environment, including water. The policy also requires development to alleviate existing problems. In cases where development may cause pollution, the policy requires pollution to be minimised, to include measures that will help resolve existing/potential problems, and also requires that cumulative effects are considered.</p> <p>Policy should therefore have positive impacts on water quality.</p>	D	P
11. To improve soil quality	+	+	+	<p>The policy should ensure that new development does not give rise to any form of pollution that would cause unacceptable harm to the environment. This includes land/soil pollution. The policy also requires development to alleviate existing problems, which may result in remediation of contaminated land for example. In cases where development may cause pollution, the policy requires pollution to be minimised, to include measures that will help resolve existing/potential problems, and also requires that cumulative effects are considered.</p> <p>Policy should therefore have positive impacts on soil quality.</p>	D	P
16. To improve health and well-being,	+	+	+	The policy should ensure that new development does not give rise to any	D	P

and reduce inequalities in health				<p>form of pollution that would cause unacceptable harm to health, safety and quality of life, and that proposals should seek to alleviate any existing problems. Certain forms of pollution are more prevalent in the city than others and are more likely to have direct health effects due to the nature of the pollution. In particular, air pollution is an issue in certain areas of the city and is very difficult for people to avoid if frequenting that area. The policy has specific additional requirements relating to air quality which should ensure that quality issues are not made worse and that air quality is improved where practicable.</p> <p>Overall, the policy should lead to an improvement in environmental quality and minimise adverse health impacts arising from various forms of pollution.</p>		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy requires outdoor lighting to be the minimum necessary whilst striking a balance to ensure there is no detriment to public and highway safety.		

### Summary

- The policy should have positive impacts on the following objectives: biodiversity, SDNP, air quality, water quality, soil quality, health and safety. The policy should ensure that new development does not give rise to any form of pollution such as air, noise, and light pollution, that will cause harm to various receptors, including people and the various aspects of the natural environment, such as biodiversity, water and land, nor to designations such as the SDNP Dark Skies Reserve. Where development may cause pollution or nuisance, evidence must be submitted to show that pollution will be minimised, measures to improve problems will be incorporated and that cumulative impacts have been considered.
- In particular, the policy has specific requirements relating to air pollution from various sources which should have positive impacts, including those that are not transport related, which should help meet Air Quality Action Plan targets and lead to improvements in air quality, as well as light pollution which should ensure that a safe level of lighting is provided whilst minimising impacts on the environment.

### Recommendations and Mitigation

- There are no further recommendations or mitigation

## CPP2 Policy Appraisal: DM41 Polluted sites, hazardous substances and land stability

### Options Stage

Various options were considered that link to this policy:

#### Polluted Land & Buildings

- Option 1) No specific policy. Rely on NPPF (paras 109-125) and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 (esp. DA2.2) and provide detail in SPD
- Option 2) Have a single policy in CPP2 just covering polluted land buildings
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail

#### Land Stability

- Option 1) No specific policy. Rely on NPPF (paras 109-125), CPP1 SA1 The Seafront, and provide detail in SPD
- Option 2) Have a single policy in CPP2 just covering land stability
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in detail

#### Hazardous Substances

- Option 1) No specific policy. Rely on NPPF (paras 109-125 esp. 120, 121, 122 & 123)
- Option 2) Have a single policy in CPP2 just covering hazardous substances and high pressure pipelines
- Option 3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters, including hazardous substances and high pressure pipelines in overview/brief
- Option 4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including hazardous substances and high pressure pipelines in detail

**This policy is considered to be linked to option 4 of all options.**

SA Objective	Short-	Med-	Long-	Summary of Effects	Dir/	Temp/
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	term	term	term		Ind (D/I)	Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	Hazardous substances could be harmful to human health or the environment, including the aquatic environment and biodiversity. The policy requires there to be appropriate measures in respect of hazardous substances; this could include appropriate distances between the proposals and an environmentally sensitive area. The policy also supports the remediation of contaminated land; this could have benefits for biodiversity through improvements to ground conditions, and could also reduce the impact of leaching which would have benefits for the aquatic environment. Overall impacts should be positive.	I	P
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	The Brighton Chalk Aquifer underlays the city and provides a high level of water storage due to the porous and permeable nature of the chalk. Large extents of the city are covered by groundwater source protection zones as groundwater quality is particularly susceptible to leaching and contamination. The policy supports the remediation of contaminated land which would have positive impacts for this objective as can reduce the risk of future leaching. Disturbance of contaminants can often trigger leaching, however the policy requirements for there to be a site investigation and to prevent leaching should stop this occurring. Overall impacts should be positive.	D	P
11. To improve soil quality	++	++	++	Many sites within the city have potential for soil/land contamination due to former or current uses. The policy supports the remediation of contaminated land and should also ensure that proposals do not result in further dispersal of contaminants. Policy considered to have significant positive impacts on this objective.	D	P
13. To make the best use of land available	++	++	++	There are many brownfield sites in the city, some of which have potential for soil/land contamination and which are currently under-utilised. There is a high need for sites to come forward in the city due to the high level of housing need, as well as need for other uses. The policy supports the remediation of contaminated land and buildings. This would have significant positive impacts on this objective as would help to make better use of existing sites and buildings in the city.	D	P

14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	+	+	Although not a direct impact, the policy supports remediation of contaminated sites and buildings. This could help increase the availability of sites and buildings available for housing delivery in the city and may help to increase housing supply.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Polluted land, hazardous substances and instable land can all have adverse impacts on health. The policy supports the remediation of contaminated land, should ensure that hazardous proposals are located at an appropriate distance from sensitive receptors, and should also ensure that proposals take account of ground conditions. All of these requirements should have positive impacts for health of the existing population and any new residents or occupiers.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Although not a direct impact, the policy supports remediation of contaminated sites and buildings. This could help increase the availability of sites and buildings available for employment purposes in the city and may help to increase supply of land in employment uses in the city. It is recognised that remediation of contaminated sites will increase costs of a development and this may impact upon the final use of the site.	I	P

### Summary

- The policy should have significant positive impacts on the objective relating to making the best use of land available. The policy supports the remediation of contaminated sites and buildings. This will help bring land back into active uses and make the best use of previously developed land and sites in the city.
- The policy should have positive impacts for the environmental objectives relating to improving water quality and improving soil quality. The policy supports the remediation of contaminated land and buildings, which will directly improve soils and also requires that any future leaching is prevented, helping to protect groundwater quality.
- The policy should have positive impacts on the biodiversity objective. The policy should ensure that any proposals for hazardous substances are suitably located to avoid sensitive environments, and should also result in remediation of contaminated land which could have benefits to biodiversity through improved ground conditions.
- The policy should have positive impacts on the health objective. The policy should lead to improved environmental quality, having benefits for health, and should ensure that proposals for hazardous developments take measures which limit any potential for adverse health impact.
- The policy could also have indirect positive impacts on the housing and economic development objectives. Remediation of contaminated land and buildings will help to increase the availability of sites in the city, which could be used to increase housing or employment land supply.



## Recommendations and Mitigation

- There are no further recommendations or requirements for mitigation.

## CPP2 Policy Appraisal: DM42 Protecting the Water Environment

### Options Stage: Water Resources & Infrastructure

- Option 1) No detailed development management policy instead rely on NPPF and CPP1 (Policy CP7 Infrastructure and Developer Contributions and CP8 Sustainable Buildings) and DA policies.
- Option 2) Detailed development management policy that combines the policy issues of protection of water resources and water/ waste water infrastructure.

This policy is considered to be linked to option 2

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	Policy should help to protect and conserve biodiversity, including the Marine Conservation Zone and marine ecology, through the requirement for development to protect and improve water quality, including seawater quality.	D	P
7. To improve water quality (ecological, chemical and quantity status)	++	++	++	Policy should have a significant positive impact on this objective through various requirements and measures which should lead to protection and improvement of water quality. This includes the requirement for development to consider risks to water quality and include measures to reduce risks to the water environment where appropriate; the requirement for development to demonstrate capacity in the sewerage network; and the requirement for development to improve water/sewerage infrastructure ahead of completion of development where necessary. The policy clearly sets out that development will not be permitted if development	D	P

				has an unacceptable impact on water quality, including water yield.		
8. To reduce the risk from all sources of flooding to and from development	+	+	+	Policy should help to reduce the risk of sewer flooding through the requirement for development to demonstrate capacity in the sewerage infrastructure and through the requirement for development to improve sewerage infrastructure ahead of occupation where required.	D	P
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	The sewerage system can become overwhelmed with surface water during significantly heavy rainfall events, which are likely to become more frequent as a result of climate change. The policy should have an indirect positive effect on helping the city adapt to climate change through policy requirements which will ensure that there is sufficient sewerage capacity to serve a development or through the requirement to improve sewerage infrastructure if required. This should help to reduce the risk of sewer flooding.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should lead to the protection and improvement of water resources, including public drinking water, through various policy requirements. This will have a direct impact on health, and therefore will have a positive impact on this objective.	I	P

### Summary

- The policy should have significant positive effects on the water quality objective, with all policy requirements contributing protecting and improving in water quality.
- The policy should have positive effects for the biodiversity objective through the requirement for development to protect and improve water quality, including seawater quality benefiting marine ecology. I
- The policy should also have positive effects for the objectives for flood risk and climate change adaptation, through the requirements which should help to reduce the risk of sewer flooding, such as ensuring sufficient, or improving, sewerage capacity.
- The policy should also have a positive impact on health, through the protection and improvement of water resources that supply drinking water.

### Recommendations

The SA suggested a change to supporting text 2<sup>nd</sup> sentence as follows: “There is a need to improve groundwater quality and quantity status.” Or “There is a need to improve groundwater status”.

Reason: Both the quantity and quality status of Brighton Chalk Aquifer are “poor”, therefore there is a need to improve both statuses. Recommendation added as suggested.

## CPP2 Policy Appraisal: DM43 Sustainable Urban Drainage

### Options Stage

- Option 1) No detailed development management policy framework to guide urban drainage solutions for new development instead rely on NPPF and City Plan Part One policies (CP7 Infrastructure and Developer Contributions, CP8 Sustainable Buildings; CP11 Managing Flood Risk).
- Option 2) Detailed development management policy to guide urban drainage solutions for new development to be supported by technical guidance provided in a Sustainable Urban Drainage SPD.

This policy is considered to be reflective of option 2.

### Assumptions

- This assessment only assesses the implications of this policy and does not consider other affects arising from development.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The policy may help to deliver net gains in biodiversity through the policy requirement for SUDS to promote improved biodiversity where possible. For instance, SUDS can include vegetated features, basins or ponds, all of which can benefit biodiversity. Impacts should be positive.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	To policy could help to deliver improved open spaces which have a reduced risk of flooding, e.g. by incorporating suitable SUDS within them. Impacts should be positive.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The inclusion of SUDS within area of high landscape sensitivity could help to protect the landscape character, as could also have a role in screening development. The policy requires SUDS to be sensitively designed and to promote an enhanced landscape where possible. Impacts should be positive.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The policy should have positive impacts on this objective through the requirements for SUDS to be sensitively designed, which should support the integration of new development into the built and historic environment, through the requirement to deliver good quality spaces, and for SUDS to	D	P

				<p>promote enhanced landscape/townscape which should lead to improved built environment.</p> <p><u>SA Recommendation</u></p> <p>The policy requires SUDS” to promote an enhanced landscape where possible”. This could be amended to include “townscape” and would further strengthen the positive impacts on this objective.</p>		
7. To improve water quality (ecological, chemical and quantity status)	++	++	++	<p>Surface water run-off can result in pollution to water resources. SUDS are used as a means of effectively managing rainfall where it falls, rather than channelling it back into the drainage system and therefore help reduce the risk of pollution to water resources that may otherwise occur from surface water run-off.</p> <p>The policy specifically requires that SUDS should be designed to ensure that local water quality is not adversely affected and the supporting text provides further information regarding how the choice of SUDS should be guided by the specific catchment and ground characteristics.</p> <p>The policy should help support the Water Framework Directive objectives by helping to improve water quality.</p> <p>Overall impacts should be significantly positive</p>	D	P
8. To reduce the risk from all sources of flooding to and from development	++	++	++	<p>This is the key objective of relevance to the policy and the policy should have significant positive impacts on helping to reduce flood risk. The policy should lead to appropriate SUDS being incorporated into development with the overarching aim of ensuring there will be a reduction in surface water leaving the site. This will help to reduce the future risk of surface water flooding.</p> <p>The policy also prohibits any subterranean development from taking place in an area where there has been previous incidents of groundwater flooding, which reduces the risk of this type of flooding affecting new development and its inhabitants/occupiers. The policy also references the forthcoming updated SFRA and how this will be used to help consider planning applications.</p>	D	P
10. To increase the city’s resilience and ability to adapt to climate change	++	++	++	<p>Climate change may result in an increase in extreme weather events in the future, including flooding from all sources. This policy ensures that the design of development considers the future impacts of climate change and helps increase resilience to climate change through helping manage surface water</p>	D	P

				and to reduce the risk of surface water and groundwater flooding. Delivery of SUDS, such as vegetated features, will also result in an increase in green infrastructure, which can help with temperature regulation, also supporting climate change adaptation.		
11. To improve soil quality	+	+	+	Although SUDS themselves do not directly improve soil quality, SUDS could help to reduce the risk of soil pollution through the filtering of runoff which can otherwise contain contaminants.	I	P
13. To make the best use of land available	+	+	+	SUDS can be multi-functional and can therefore be considered to make efficient use of land. E.g. SUDS which also provide for biodiversity.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Health, particularly mental health can be adversely affected by flood events. The policy should help to reduce the risk of surface water flooding, and help to prevent deterioration of the environment as a result of flooding events, both of which would have positive impacts for health.	I	T/P
18. To increase equality and social inclusion	+	+	+	Flooding and flood events could have a particular effect on certain people with protected characteristics more than those without protected characteristic, e.g. older people, younger people, disabled people. The policy should help to reduce the risk of flooding, which should indirectly limit any adverse impacts on those more vulnerable to the effects of flooding.	I	T/P

### Overall Summary

- The policy should have significant positive impacts for objectives relating to water quality, flood risk and climate change adaptation. The policy should help to manage surface water on site, should reduce the risk of surface water flooding on site as well as elsewhere, and should also prevent the risk of future groundwater flooding events in new developments. The policy should result in SUDS that are suitable to the site, which would also help to protect quality of groundwater, and should also support climate change adaptation through reducing the risk of flooding and through increasing green infrastructure.
- The policy should have positive impacts on objectives relating to: biodiversity, as could result in SUDS measures comprising biodiversity features or habitats; open space as could result in improved open spaces provided in developments; SDNP as could result in sensitively designed SUDS which could enhance landscape; heritage assets/townscape as could help new development integrate into the existing built environment and ensure that townscape is enhanced through SUDS; soil quality, through filtering of surface water that may contain contaminants; best use of land through provision of SUDS which have multi-

functional benefits; and health and equalities as could reduce the risk of health impacts associated with flooding/risk of flooding, including for vulnerable groups.

**Recommendations**

- The initial SA of an earlier draft of the policy recommended that paragraph 3 be amended to include a reference to enhancing townscape. This recommendation was implemented as suggested which further strengthened to impacts for objective 4.
- There are no further recommendations.

**CPP2 Policy Appraisal: DM44 Energy Efficiency and Renewables**

**Options Stage**

- Option 1: No Energy Efficiency and Renewables policy within development management policy framework to guide application of energy policy for development. Instead rely on NPPF and City Plan Part One policies (CP8 Sustainable Buildings).
- Option 2: Development management policy on Energy Efficiency and Renewables to guide application of energy policy for development.

**Policy considered to be reflective of option 2**

**Assumptions**

- Renewables technologies could include various forms of technologies such as wind turbines and solar PV, although it is noted that the predominant form in Brighton & Hove is solar PV.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-?	-?	-?	Certain types of low/zero energy infrastructure may have adverse impacts on ecology, depending on the type installed, scale and location. E.g. wind turbines could affect bats and birds and this would need to be assessed as part of any application. Solar PV is not considered to have any impacts on this objective.	I	P

				Impacts are also uncertain as would depend on type, scale and location of installation. <b>Mitigation:</b> CPP1 Policy CP8 expects development to enhance biodiversity; CP10 requires development to conserve and protect biodiversity. This should ensure a neutral effect is achieved.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-?	-?	-?	The policy supports greater reductions in CO2 emissions, e.g. through fabric efficiency and LZC technologies, in certain areas of the city. This includes on urban fringe housing allocations. These sites are all situated within close proximity to the SDNP. Some LZC technologies, e.g. wind turbines, could have an adverse visual impact on landscape. Mitigation: CPP1 policy SA5 should ensure that development does not have an adverse impact on the setting of the SDNP.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-?	-?	-?	The policy supports greater reductions in CO2 emissions, e.g. through fabric efficiency and LZC technologies, in certain areas of the city. This includes within Development Areas, some of which include heritage designations. Some LZC technologies, including solar PV and wind turbines could have an adverse impact on heritage assets and townscape. Mitigation: CPP1 policy CP15 Heritage and emerging CPP2 policies that provide policy on protecting heritage assets and their settings, and policy on design should provide mitigation and ensure either a neutral or positive impact is achieved.	I	P
6. To improve air and noise quality	-	-	-	Some forms of renewables technologies, such as wind turbines, can produce noise which can impact upon occupier amenity. This would be dependent on their location. Provision of this type of technology in industrial estates, as suggested by the policy, would be compatible with surrounding uses. Mitigation: Emerging policy on Protection of Environment and Health should address any potential noise impacts.	I	P
9. To reduce emissions of greenhouse gases that cause climate change	++	++	++	48% of residential development in 2016/17 was through conversions and changes of use which did not have to meet any additional carbon reductions	D	P

				<p>over building regulations.</p> <p>The policy requires all development, including conversions and changes of use, to achieve at least 19% improvement in CO2 reductions required by building regulations. This will help to ensure that all types of development, and not just new build, will be more energy efficient and ultimately produce less carbon emissions. The policy also requires development to achieve certain standards of energy performance, which again should help to reduce carbon emissions.</p> <p>The policy also supports greater reductions in CO2 emissions in certain areas of the city, e.g. through passive design and fabric efficiency, as well as through renewable technologies, such as Development Areas, urban fringe allocations and industrial areas.</p> <p>Policy should have significant positive impacts on achieving this objective.</p>		
16. To improve health and well-being, and reduce inequalities in health	++	++	++	<p>Fuel poverty is higher in Brighton &amp; Hove than the regional and national average. Having an energy efficient home has direct health benefits for all future occupiers, and particularly for those who have lower incomes and who may suffer from fuel poverty.</p> <p>The policy would ensure that all types and scales of development achieve a certain standard of energy efficiency/CO2 emissions, rather than just new build homes or other developments over a certain size.</p> <p>This would ensure that all new homes, including those that are delivered through conversions and changes of use, help to address the risks of fuel poverty, reduce health inequalities and support health.</p>	I	P
18. To increase equality and social inclusion	+	+	+	<p>Fuel poverty is higher in Brighton &amp; Hove than the regional and national average. Having an energy efficient home has direct benefits for occupiers, and particularly for those who have lower incomes and who may suffer from fuel poverty. It is recognised that people on lower incomes are not a “group of protected characteristics”, although some people with protected characteristics may have low incomes.</p> <p>The policy would ensure that all types and scales of development achieve a certain standard of energy efficiency/CO2 emissions, rather than just new build homes or other developments over a certain size.</p> <p>This would ensure that all new homes, including those that are delivered</p>		



				through conversions and changes of use, help to address the risks of fuel poverty and reduce health inequalities for future occupants.		
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### Overall Summary

- The policy should have potential for significant positive impacts for the objective for reducing greenhouse gas emissions. The policy would ensure that all types and scale of development, and not just new build, would have to meet certain standards in terms of CO2 emissions and should lead to greater reductions in CO2 emissions from the energy consumption. The policy also actively encourages incorporation of renewables in certain areas.
- The policy was also found to have potential for significant positive impacts for objectives for health, through the health benefits that energy efficient homes have and the potential to reduce the risk of fuel poverty and health inequalities
- The policy was found to have potential for positive impacts for the objective for deprivation, through the potential for the policy to address fuel poverty, which affects people on lower incomes who may also have protected characteristics, and address health inequalities.
- The policy was found to have potential for adverse uncertain impacts on the objective for noise quality, due to the potential for certain types of renewables technologies to generate noise which can affect occupier amenity. There could also be potential adverse effects on the objectives for biodiversity, as some types of renewables can impact upon ecology, and also the SDNP and the historic built environment as the policy encourages renewables infrastructure within urban fringe locations, which are all within the setting of the SDNP, and within Development Areas, some of which have heritage constraints, however is uncertain as would depend on the type of technology and location.

### Mitigation

- CPP1 policy SA5 Development within the Setting of the SDNP should ensure that development does not have an adverse impact on the setting of the SDNP.
- CPP1 policy CP15 Heritage and emerging CPP2 policies that provide policy on protecting heritage assets and their settings, and policy on design should provide ensure that development does not have an adverse impact on heritage assets.
- Emerging policy on Protection of Environment and Health should address any potential noise impacts.

### Recommendations

There are no recommended changes to policy

## CPP2 Policy Appraisal: DM45 Community Energy

### Options Stage

- Option 1) No community energy policy within development management policy framework to guide application of energy policy for development instead rely on NPPF and City Plan Part One policies (CP8 Sustainable Buildings)
- Option 2) Development management policy on Community Energy to guide application of energy policy for development.

**This policy is considered to be linked to option 2.**

### Assumptions

- This assessment only assesses the impacts arising from the actual energy infrastructure delivered.
- This assessment does not assess the impacts arising from the development (e.g housing, retail etc) as this is provided elsewhere.
- This policy could result in various types of renewable energy infrastructure being installed e.g. wind, solar, thermal heat. However it is noted that the predominant form of community energy infrastructure in Brighton & Hove is solar PV.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-?	-?	-?	<p>Certain types of low/zero energy infrastructure may have adverse impacts on ecology, depending on the type installed, scale and location. E.g. wind turbines could affect bats and birds and this would need to be assessed as part of any application.</p> <p>Solar PV is not considered to have any impacts on this objective.</p> <p>Impacts are also uncertain as would depend on type, scale and location of installation.</p> <p><b>Mitigation:</b> CPP1 Policy CP8 expects development to enhance biodiversity; CP10 requires development to conserve and protect biodiversity. This should ensure a neutral effect is achieved.</p>	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable	-?	-?	-?	<p>Certain types of renewable energy infrastructure may have adverse impacts on landscape, depending on the type installed, scale and location. E.g. wind turbines could result in an adverse visual impact on landscape.</p>	I	P

access to it				<p>Solar PV is not considered to have any impacts on this objective. Impacts are also uncertain as would depend on type, scale and location of installation.</p> <p><b>Mitigation:</b> Supporting text of policy refers to consideration of landscape impacts. CPP1 Policy SA5 protects against significant harm to the setting of SDNP. This should ensure a neutral effect is achieved.</p>		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-?	-?	-?	<p>All forms of low/zero carbon energy infrastructure could have adverse impacts on the historic built environment, through potential for adverse visual impacts though in many cases these can be mitigated by good design. Impacts are also uncertain as would depend on the scale and location of installation.</p> <p><b>Mitigation:</b> Supporting text of policy refers to consideration of heritage impacts. CPP1 Policy CP15 Heritage and emerging CPP2 policies that provide policy on protecting heritage assets and their settings, and policy on design should provide mitigation and ensure either a neutral or positive impact is achieved.</p>	I	P
6. To improve air and noise quality	-?	-?	-?	<p>Wind turbines may result in localised noise impacts, the severity of which would depend on their location and proximity to sensitive receptors. Biomass power plants could result in air quality impacts. Use of renewable energy technologies such as solar or heat pumps as an alternative to combustion technologies for producing heat using e.g. gas or biomass mitigate against poor air quality resulting from local emissions to air. Solar PV would not have any air or noise quality impacts. Impacts are also uncertain as would depend on type, scale and location of installation.</p> <p><b>Mitigation:</b> Supporting text of policy refers to consideration of amenity impacts. Emerging CPP2 policy on pollution and nuisance control should ensure a neutral effect is achieved.</p>	I	P
9. To reduce emissions of greenhouse	++	++	++	This policy would enable installation of low/zero carbon energy	D	P

gases that cause climate change				infrastructure on developments that may otherwise not be able to install such infrastructure (e.g. due to viability) through the partnership approach with community energy partners. This will result in reduced carbon emissions and contribute positively towards this objective.		
13. To make the best use of land available	+	+	+	Delivery of renewable energy infrastructure, e.g. solar PV on a roof of a new building, is considered to be making a good use of land available, e.g. no additional land-take is required to provide this type of energy infrastructure.	I	P
16. To improve health and well-being, and reduce inequalities in health	+/-?	+/-?	+/-?	<p>Wind turbines may result in noise and visual impacts, which could affect health depending on their location and proximity to sensitive receptors. Biomass power plants could result in adverse air quality impacts. Other forms of renewable/low carbon energy may mitigate against poor air quality by offering non combustion solutions to heat generation. Solar PV is not considered to have any adverse health impacts.</p> <p>The policy is also considered to have positive health impacts, as community energy companies deliver schemes to local residents which could improve health, e.g. through offering lost cost energy to residents, thus reducing fuel poverty and through providing energy efficiency advice, as well as increasing energy security.</p> <p><b>Mitigation:</b> Supporting text of policy refers to consideration of amenity impacts. Emerging CPP2 policy on pollution and nuisance control should reduce likelihood of adverse health impact.</p>	I	P
18. To increase equality and social inclusion	+	+	+	Community energy companies deliver schemes to local residents such as providing energy efficiency advice, could help to reduce fuel poverty and thus help to reduce health-based deprivation.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Community Energy is a relatively new sector and Community Energy partners tend to be locally-led social enterprises. By encouraging development to work with community energy partners, the policy is contributing positively towards this objective by supporting new and emerging sectors, and supporting the growth of low carbon business.	I	P

## Summary

- The policy has potential for significant positive impacts for the objectives relating to reducing greenhouse gas emissions as should result in renewable energy infrastructure on new developments which will help reduce greenhouse gas emissions.
- The policy has potential for positive impacts for making the best use of land, increasing equality and economic development, as will make good use of land available e.g. through situating solar PV arrays on rooftops, may help to reduce health-based deprivation through schemes delivered by community energy partners and may support new and emerging local carbon businesses.
- The policy has potential for mixed (positive/adverse) for the health objective. Certain types of renewable energy infrastructure could have adverse health or amenity impacts, e.g. noise nuisance or air quality impacts which would require mitigation and consideration. However, schemes delivered through community energy partners can help to improve fuel security and reduce fuel poverty which would have positive health effects.
- The policy has potential for adverse impacts for the objectives relating to biodiversity, landscape, heritage and air/noise quality. Installation of renewable energy technology could have adverse impacts on certain species, could have visual impacts and could produce emissions or noise nuisance, depending on the location, scale and type of technology delivered. Solar PV, which is the predominant form of community energy installation locally is not considered to have any adverse impacts on these objectives.

## Recommendations

There are no recommendations. Mitigation for potential adverse impacts is considered to be provided by either existing adopted policy or will be addressed through emerging CPP2 policy.

## CPP2 Policy Appraisal: DM46 Heating and cooling network infrastructure

### Options Stage

- Option 1) No policy framework to manage standards for Communal and District Heating in the City Plan (CPP1/NPPF)
- Option 2) Criteria based policy to manage standards in Communal and District Heating in the City Plan
- Option 3) Develop supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (SPD only)
- Option 4) Develop policies in the city plan and supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (CPP2 + SPD)

**This policy is considered to be linked to option 2**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Heat Networks may offer a means to incorporate low and zero carbon energy solutions into the historic built without adverse impacts on assets and their settings. Much heat network infrastructure is not visible (boilers located within buildings, pipes below ground, flues can be hidden in existing chimneys).	I	P
6. To improve air and noise quality	-?	-?	-?	All combustion technologies release various gaseous emissions, including nitrous oxides which can have air quality impacts. Installing CHP may reduce emissions where they replace multiple existing boilers. In some situations overall emissions of air pollutants may fall, but local emissions may rise. This will also be dependent on the type of fuel used for the CHP and mitigation approaches. This could have implications for the AQMA depending on the system used, however certain systems could benefit or be more suitable within the AQMA e.g. heat pump technology generates heat without local emissions to air compared to combustion technologies. Impacts will depend on what is implemented and where. <b>Mitigation:</b> Air quality impacts of heating/cooling system used will need to be considered on a case by case basis, but particular consideration will be required for developments within the AQMA or near to the AQMA. Emerging CPP2 policy that cover the issues of pollution and nuisance should provide mitigation.	I	T
9. To reduce emissions of greenhouse gases that cause climate change	++	++	++	The policy provides clarity to developers, may help to bring forward low carbon, suitable, acceptable and better quality CHP development, and should help to ensure delivery of heat networks and future connectivity of heat networks, thus supporting a reduction in carbon emissions.	D	P
12. To minimise and sustainably manage waste	+	+	+	CHP installations use waste heat to produce power and thus save energy. Although waste heat is not a type of waste in the traditional physical sense, nor one that needs to be managed as such, it is a resource that can be utilised and reused for other purposes. The policy is therefore considered to have an indirect positive effect on	I	P

				this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy will manage standards in communal and district heating. The policy refers to protection for customers to ensure that a quality, affordable heat service is provided which protects customers with regards to price and therefore may help to reduce risk of fuel poverty.	I	P

### Summary

- The policy has potential to have significant positive impacts for the objectives relating to reducing greenhouse gas emissions as the policy promotes and should help support delivery of quality CHP systems, as well as ensuring delivery and future connectivity of heat networks, all of which will help to reduce carbon emissions.
- The policy also has potential for positive impacts for heritage, minimising waste and health. Heat networks could indirectly help protect the historic built environment as they offer an in-obtrusive way of incorporating low/zero carbon technology into the historic built environment. CHP makes use of waste heat as a resource. In addition, the policy requirements should also protect customers from fluctuations in price, therefore potentially benefiting health through reducing risk of fuel poverty and making heating more affordable.
- The policy has potential to have adverse uncertain impacts on the objective relating to air quality. Some forms of CHP can have localised air quality impacts, although it is recognised that some do not, e.g. heat pump technology. The level of the effect will depend on the type of fuel/system used and whether the development is located within or near to an area with existing air quality issues.

### Recommendations

- It is recommended that the policy links to the emerging CPP2 policy on pollution and nuisance control, which should ensure that air quality impacts of CHP systems are considered and addressed. Added as suggested. No further mitigation

**Site Allocations Policies**

**Special Area policies**

**CPP2 Policy Appraisal: SA7 Benfield Valley**

**Options Stage**

- Option 1) No detailed policy framework and site allocations to guide new and appropriate development on the city’s Urban Fringe sites (rely on market to bring forward)
- Option 2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations
- Option 3) Bespoke criteria-based policies for each urban fringe site allocated

**Policy considered to be reflective of option 3**

**Assumptions**

- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts, however assumes generic impacts arising from development would be addressed (e.g. such as any increases in resource use).
- This SA also takes into consideration findings from any background evidence, e.g. Urban Fringe Assessments

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	<p>Site is a SNCI/LWS, contains LBAP habitats and some protected species. The overarching priority of the policy is to protect and enhance the site as a LWS and secure ongoing management and maintenance of the site for biodiversity. The supporting text refers to the need for an ecological appraisal to inform development and ongoing management.</p> <p>Although the policy supports delivery of housing across 2 contained parts of the site (c.8%) which may present risk to biodiversity within that area, it is recognised that the UFA2015 found the ecological value within this area to be low and that impacts could be mitigated through measures such as green roofs,</p>	D	P



				<p>SUDS and wildlife friendly planting, as well as also through enhancements to the wider LWS.</p> <p>Overall the policy should result in enhancements to features of nature conservation importance and should ensure that a large proportion of the site is retained as a LWS and that the LWS is improved. Overall impacts should be positive.</p>		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	<p>Site is publically accessible designated open space of the natural/semi-natural typology and golf course. There is no over-riding deficiency in open space within the ward.</p> <p>The overarching priority of the policy is to protect and enhance the site as a green wedge and Local Green Space, to protect and enhance the open spaces through a funded management and maintenance plan, and to improve access to and through the site.</p> <p>Although the policy supports delivery of housing across part of the site (c.8%) which will result in a net loss of open space, the policy should result in enhancements and improvements to the remaining open space including improved access, potentially replacing losses with improved open space, which should help to mitigate against losses. Overall impacts should be positive.</p>	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	--	--/+?	-/+?	<p>Site is adjacent to SDNP separated by the A27. Site has an important landscape role forming a green wedge from the SDNP into the city. The overarching priority of the policy is to protect and enhance the site as an important green wedge that connects the city to the SDNP, and seeks to improve access to and understanding of the SDNP through support for gateway facilities, potentially having positive impacts.</p> <p>The policy supports delivery of housing within 2 contained areas within the site (c.8%), broadly where UFA 2014 initially found there to be potential for development without risk of significant landscape impacts. However, the findings of the Further Urban Fringe Assessment 2015 suggested that development providing over 30 dwellings would have a significant impact on landscape, particularly in the short to medium term when buffers and any screening measures were not established. It is noted that the residential potential for the sites is 100 dwellings.</p> <p>Impacts are considered to be significantly adverse in the short term, changing</p>	D	P

				<p>to mixed in the longer term as mitigation measures help to reduce visual effects. This is also uncertain reflecting the increased amount of residential development compared to the amount which has undergone further assessment.</p> <p>Mitigation: The supporting text refers to the need for a LVIA to inform any future development, which should help to identify mitigation, such as buffers, screening and design. In addition, CPP1 SA5 should ensure that development within the setting of the SDNP protects and contributes towards the purposes of the NP.</p>		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	<p>The site includes the Benfield Barn Conservation Area which contains the listed barn. The Conservation Area is on the heritage at risk register. The northern part of the site contains an ANA.</p> <p>One of the objectives of the policy is to repair and re-use Benfield Barn, in a way that is sympathetic to the Conservation Area and wider landscape, potentially for community or recreational uses. This should have positive impacts for this objective through improving a neglected heritage asset and bringing it back into active use and will potentially remove the Conservation Area from being "at risk".</p> <p>The policy will result in delivery of housing within 2 contained areas of the site, however these are not within the ANA, and are not adjacent to the Conservation Area. The policy requires development to preserve the settings of both Benfield Barn and Hangleton Conservation Areas and should therefore result in development that integrates well with the historic environment.</p> <p>The supporting text requires submission of a heritage statement, as well as appropriate buffers and screening which should ensure any new development does not adversely impact upon the setting of the heritage assets. Overall impacts are considered to be positive.</p>	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	<p>The policy will result in delivery of housing (100 dwellings in accordance with policy H2). Any new development would increase transport movements in the vicinity of the site and it is noted that the Hangleton Link Road, a key feeder road from the city to the A27, already suffers from congestion. However the site can be accessed by other routes.</p> <p>The policy requires public access to be improved through the site, as well as</p>		

				<p>improved pedestrian and cyclist access, which could promote sustainable travel. Although the site has reasonable access to a bus service, there is no bus service that directly serves the site and the site's location in very close proximity to the SRN also could influence car ownership and travel choice. It is also noted that some services are located more than maximum walking distance (health and shops). Impacts are therefore considered to be mixed. It is noted that the supporting text requires submission of a Transport Assessment.</p> <p>Mitigation: CPP1 CP9 Sustainable Transport and emerging CPP2 policy on transport, including the requirement for a transport assessment, should help to facilitate sustainable travel and mitigate any transport impacts.</p>		
6. To improve air and noise quality	--	--	--	<p>The site is located outside the AQMA and therefore development would need to produce an average of 500 additional vehicle movements in order to have a significant effect on localised air quality<sup>18</sup> which may be possible from the amount of development proposed. This would be confirmed through a transport and air quality assessment.</p> <p>The entire site suffers from high levels of road noise, from the adjacent A27 and also Hangleton link road, which could impact upon occupier amenity. The development may contribute towards increasing road related noise.</p> <p>Mitigation: emerging CPP2 policy on Transport Assessments and Protection of Environment &amp; Health should ensure noise and air quality issues are addressed.</p>	I	P
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>The site is not within a GSPZ.</p> <p>There are no additional specific policy requirements relating to water quality or resources within the policy.</p> <p>CPP1 CP8 sets the standards relating to water quality and consumption for new build residential which would be applied. Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
8. To reduce the risk from all sources of flooding to and from development	0	0	0	<p>Only a small part of the site, the area adjacent to Hove Park School, has any risk of surface water flooding. The areas with potential for residential development</p>		

<sup>18</sup> Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance on 'Land-Use Planning & Development Control: Planning For Air Quality' suggests that significant impacts are likely where a development causes a change in daily light vehicle flows of 500 annual average daily total (AADT) outside of an AQMA, or 100 AADT within or adjacent to an AQMA.

				do not have any risk of surface water flooding. There are no additional specific policy requirements relating to flood risk. CPP1 CP8 requires all development to reduce surface water run-off and CPP2 policy on SUDS requires there to be a reduction in surface water leaving a site. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area. CPP1 CP8 sets the standards relating to energy consumption for non-residential development which would be applied. Overall the policy is considered unlikely to have any additional impacts on this objective.		
10. To increase the city's resilience and ability to adapt to climate change	-/+	-/+	-/+	The site currently comprises areas of open space which perform natural functions e.g. temperature regulation and absorption of water. Development on parts off the site therefore may reduce the city's ability to adapt to climate change through change in form from a natural to urbanised form on parts of the site. However it is recognised that the policy retains a large proportion of the site (92%) in open space uses, which should therefore continue to support climate change adaptation, and that the site itself does not suffer particularly from flood risk. Any improvements to open space could include SUDS to support improved flood risk management although this is not referred to in the policy or supporting text. In addition, screening provided to reduce visual landscape effects and any biodiversity mitigation may help to achieve net gains in green infrastructure. Overall, the policy is considered to have mixed impacts on this objective.	I	P
11. To improve soil quality	0	0	0	The site is not known to be contaminated. There are no additional specific policy requirements relating to remediation of contaminated land or improving soil quality and the policy itself is considered unlikely to have any additional impacts on this objective.		
12. To minimise and sustainably manage waste	+	+	+	Policy seeks to repair and restore Benfield Barn listed building and supports bringing the barn back into active uses. This helps to preserve resources having positive impacts on this objective.	I	P

13. To make the best use of land available	+	+	+	The site is currently in open space uses. Delivery of 100 dwellings on a part of the site would equate to c.63dph, which would exceed minimum density targets set by CPP1 and should still enable a significant proportion of the site to remain as open space uses. Additionally, delivery of housing would help to secure funding that could then be used to improve and maintain the open spaces and nature conservation features within the site, potentially improving the offer and indirectly making better use of the site.	D/I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	Policy supports delivery of 100 houses on part of the site, which would make a significant contribution towards housing need in the city. A proportion of the housing would be affordable, and should deliver 40 affordable units in accordance with CPP1. Additionally, as an urban fringe site, some family type housing could also be delivered which may help to meet this need.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy requires public access to be improved through the site, as well as improved pedestrian and cyclist access, which could promote sustainable travel and improve access to and through the area. The policy supports the use of Benfield Barn as a community/recreational facility however does not require any other types of community facilities/services to be delivered as part of the scheme. It is noted that some services are located more than maximum walking distance (health and shops). However, overall the policy should improve access and impacts are still considered to be positive.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Housing is one of the wider determinants of health. Delivery of housing would therefore contribute towards health. Although some open space would be lost through the delivery of housing, a large proportion of the site would remain in open space uses, and combined with improved pedestrian and cyclist access, should still provide opportunities for physical health-promoting activity. The site is not within an AQMA. All of the site suffers from high levels of road noise which could impact upon occupier amenity. Overall impacts on health are considered to be positive. Mitigation: policy could refer to the need to ensure the design of development considers noise as an issue, however this will be addressed through emerging CPP2 policy.	I/D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Bringing vacant and derelict buildings back into use can reduce the risk/fear of crime. Therefore the repair and restoration of Benfield Barn could contribute	I/D	P

				towards improving community safety. Crime deprivation is not an issue within this SOA, however development would increase active uses on the site, which itself would increase passive surveillance and can help to deter crime.		
18. To increase equality and social inclusion	+	+	+	Site should deliver 40 affordable houses, based on 40% of 100 houses, and therefore contributes to reducing housing-based deprivation.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy will not result in any increase in employment land, however it is recognised that housing is intrinsically linked to economic growth, and that development can provide employment opportunities. Also, the policy supports delivery of a SDNP gateway facility, which help promote SDNP related tourism.	I	P

### Overall Summary

- The policy was found to have potential for significant positive effects for the housing. The policy should lead to provision of a significant amount of housing, including affordable housing and may also deliver some family type-housing.
- The policy was found to have potential for positive effects for biodiversity and open space. Whilst the policy supports housing delivery on two parts of the site, the policy was found to have overall benefits these objectives, as it seeks to secure funding to protect and enhance the remainder of the site for nature conservation and open space purposes. It is also noted that the areas for development have been assessed as having lower ecological value than other parts of the site which should help to minimise ecological losses.<sup>19</sup>
- The policy was also found to have potential for positive effects for heritage, waste, best use of land, access, health, community safety, equalities and economic development. The policy should lead to the repair and restoration of the Benfield Barn listed building, also helping to preserve resources and reduce waste, and should result in development that is sensitive to the settings of the historic built environment. The delivery of 100 homes would help to make good use of the two sites for development, and would also help to improve the surrounding site through securing ongoing maintenance and management, improving the open space offer. The policy should lead to improved public access to and through the site, including for pedestrians and cyclists, also having health benefits in combination with the delivery of housing which is a wider determinant of health. Delivery of housing will also increase active uses in the area, which could help contribute towards community safety as would bringing back into use the derelict Benfield Barn. Delivery of housing, particularly affordable housing can help reduce housing-based deprivation and also contributes towards economic growth.
- The policy was found to have potential for significant adverse / mixed impacts for landscape, although impacts should improve over time. The policy supports delivery of housing on two parts of the site. These have been assessed as having potential for significant landscape effect<sup>20</sup> based on a lower amount than proposed in the policy and therefore a higher amount could have a greater significant landscape effect particularly in the short term whilst any screening mitigation is ineffective. Impacts become less significantly adverse in the longer term as mitigation becomes more effective although are still

<sup>19</sup> Urban Fringe Assessment 2015

<sup>20</sup> Urban Fringe Assessment 2015

considered to be adverse. Positive impacts relate to support for delivery of a SDNP interpretation facility as well as improvements to access to the site which could help improve access to and understanding of the National Park.

- The policy was found to have potential for significant adverse impacts for air and noise quality. The site suffers from road noise, which could impact upon occupier amenity and which could worsen through any increase in transport movements. Although outside the AQMA, delivery of 100 dwellings on the site could result in an increase in vehicle movements that has a significant effect on air quality.
- The policy was found to have mixed impacts for transport and climate change adaptation. Residential development on the site is likely to increase vehicle movements around the site, and it is recognised that some services are located more than preferred maximum walking distance from the site which could influence travel choice. However the policy should result in improved access, including for pedestrians and cyclists. Residential development will result in loss of open space which provides natural functions, including contributing to climate change adaptation. Loss may therefore inhibit climate change adaptation although it is recognised that a significant proportion of the site will remain in a natural form.
- The policy was also found to have no impacts on water quality, soil quality and flood risk, as the site is not within a GSPZ, is unlikely to be contaminated, and the two areas allocated for development do not have any risk of flooding.

#### **Recommendations / Suggestions**

- Policy/supporting text could refer to opportunities to incorporate biodiverse SUDS as part of biodiversity mitigation, as this would have additional wider benefits in terms of supporting climate change adaptation and flood prevention. However it is recognised that emerging CPP2 policy on SUDS will require this. Not included as addressed by other policy.
- Policy/supporting text could refer to opportunities to reduce road noise impacts through design, to help mitigate against amenity/health impacts. However it is recognised that emerging CPP2 policy on Protection of the Environment and Health should ensure this issue is addressed. Not included as addressed by other policy.

#### **Other mitigation**

- Landscape: The supporting text refers to the need for a LVIA to inform any future development, which should help to identify mitigation, such as buffers, screening and design. In addition, CPP1 SA5 should ensure that development within the setting of the SDNP protects and contributes towards the purposes of the NP.
- Transport and air quality: CPP1 CP9 Sustainable Transport and emerging CPP2 policy on transport, including the requirement for a transport assessment and air quality assessment, should help to facilitate sustainable travel and mitigate any transport impacts.

## Strategic Mixed Use sites

### CPP2 Policy Appraisal: SSA1 Brighton General Hospital site

#### Options Stage

- Option 1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)
- Option 2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites
- Option 3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site

This policy is reflective of option 3.

#### Assumptions

- The policy will not repeat anything of a strategic nature that is already included in CPP1 and CPP1 policy requirements will be implemented.
- This SA includes an assessment of the impacts of the policy itself as well as considers the any site based impacts arising from implementation of the policy.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There are no additional policy requirements relating to biodiversity within the policy. There are no sites of nature conservation importance on or adjacent to the site and development is unlikely to have any effect on those nearest to the site. The site is PDL with some areas of amenity greenspace, however is not considered to have much potential for biodiversity. Net gains in biodiversity could be achieved on site through implemented of CPP1 CP10. Therefore there are no direct impacts on this objective by the policy itself.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The site includes several areas of amenity greenspace. The policy requires this open space provision to be maintained and improved and to include children's playspace or a multi-use sports facility linked to the public realm network. The policy should therefore lead to an improvement in the on-site open space and increase access to open space. It is noted that the nearest children's playspace from the site is beyond the adopted accessibility standards, therefore the policy should help to improve access to this type of provision in the wider areas	D	P
3. To protect, conserve and enhance	0	0	0	There are no additional policy requirements relating to landscape within the		



the South Downs National Park and its setting, and improve sustainable access to it				policy. The site is within urban area and is screened from the SDNP by existing buildings. Therefore there are no direct impacts on this objective by the policy itself.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The site contains the Grade II listed Arundel building which is in a prominent hilltop location visible from various points of the city. CPP1 CP15 sets the strategic policy approach in relation to heritage. In addition, the policy has specific requirements relating to the designated and non-designated heritage assets on the site and should lead to the preservation and enhancement of these assets and surrounding townscape.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	The policy includes provision for a minimum of 200 dwellings, health, care and community facilities. These types of development are likely to be associated with vehicle movements at various times of the day, and the amounts of development may result in an increase in vehicle movements to the site above current levels. It is unknown whether any of the housing delivered will be car free. However, the site has very good existing access to regular bus services and the policy includes specific requirements relating to improving sustainable transport infrastructure including pedestrian and cyclist access. Overall the policy should lead to improved sustainable transport provision which could influence travel choice, however development may still result in an increase in vehicle movements around the site. Impacts considered to be mixed. Emerging CPP2 policy would require a Transport Assessment to be submitted which should help to address transport impacts.	D	T/P
6. To improve air and noise quality	-/+	-/+	-/+	The site is not within or in close proximity to the AQMA and can be accessed via a number of different routes. The site does not suffer from high levels of road noise. The amount of development proposed for the site could result in an increase in vehicle movements that may result in an impact on localised air quality. <sup>21</sup> However it is noted that the policy includes requirements that should improve sustainable transport provision which could influence travel choice.	I	T

<sup>21</sup> Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance on 'Land-Use Planning & Development Control: Planning For Air Quality' suggests that significant impacts are likely where a development causes a change in daily light vehicle flows of 500 annual average daily total (AADT) outside of an AQMA, or 100 AADT within an AQMA.

				Impacts considered to be mixed.		
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>The site is not within a GSPZ.</p> <p>There are no additional specific policy requirements relating to water quality or resources within the policy.</p> <p>CPP1 CP8 sets the standards relating to water quality and consumption for both new build residential and non-residential development which would be applied, and conversions would need to demonstrate how water resources are conserved.</p> <p>Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
8. To reduce the risk from all sources of flooding to and from development	+	+	+	<p>The site has some small areas of low to medium surface water flood risk on site. It is noted that the existing open spaces on the site will be retained and these will contribute towards absorbing surface water, and may therefore play a role in reducing surface water flood risk.</p> <p>There are no additional specific policy requirements relating to flood risk within the policy however following SA recommendation on an early iteration, the supporting text now includes a reference to making use of opportunities to incorporate SUDS within the open space and landscaping improvements. This could have positive impacts on this objective.</p> <p>Mitigation would be provided by emerging CPP2 policy on SUDS which requires there to be a reduction in surface water leaving a site.</p>	I	P
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area.</p> <p>CPP1 CP8 sets the standards relating to energy consumption for both new build residential and non-residential development which would be applied, and conversions would need to demonstrate how energy consumption is reduced.</p> <p>Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	<p>The site includes some existing areas of amenity greenspace, which may help with surface water management and temperature regulation. These areas of open space will be protected through the policy and therefore the policy will indirectly support climate change adaptation. Incorporation of SUDS within</p>	I	P

				these open space improvements would further strengthen these positive impacts. (see objective 8).		
11. To improve soil quality	0	0	0	The site may have potential for contamination due to medical uses which would require remediation. There are no additional specific policy requirements relating to remediation of contaminated land within the policy and overall the policy itself is considered unlikely to have any additional impacts on this objective. Emerging CPP2 policy on Polluted Sites should ensure that any necessary remediation takes place if required.		
12. To minimise and sustainably manage waste	+	+	+	The policy requires the preservation of the listed building and non- designated heritage assets. This will help to reduce waste and preserve resources through the adaptation and conversion of existing buildings.	D	P
13. To make the best use of land available	+	+	+	The policy requirements include provision of significant amount of housing and health facilities on site, and will increase in the amount of development compared to that currently provided on site. The onsite dwelling density would equate to 35dph which although less than CPP1 density targets, reflects the other uses to be delivered on site, including retention/conversion of the listed building. Sensitive conversion of the heritage asset may also enable better use of this building to be made, particularly if the health and care facilities are transferred to a new purpose built facility which can better provide for modern health needs.	D	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy requires a minimum of 200 dwellings to be delivered on site. This should include 40% affordable housing which would equate to 80 units. The policy would therefore make a significant contribution to local housing needs.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy requires health/care facilities and community facilities to be provided on site which would increase or improve access to these services.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	Policy should lead to protection and improvement of existing open space, including provision of children's playspace or sports facility which will contribute to both mental well-being and physical health. The policy requires provision of community facilities, which can help support community interaction, also contributing towards health. Provision of new health/care facilities will facilitate access to improved facilities, supporting access to health provision. Policy should result in provision of housing, which is	D	P

				one of the wider determinants of health. Policy also requires improvements to pedestrian and cyclist access, which could help to encourage active forms of travel, also having health benefits.		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Provision of mixed uses, including community facilities and improved open spaces can help support community safety by providing opportunities for community interaction and passive surveillance. The policy requires improvements to pedestrian and cyclist access to and through the site, which should help to support road safety. Site located within 40% most deprived SOA (crime domain) and therefore opportunities to design out crime should be maximised.	I/D	P
18. To increase equality and social inclusion	+	+	+	Provision of housing will include a proportion of affordable units in accordance with CPP1 CP20 which will support people on lower-mid incomes. The site is located within the 10% most deprived SOA (employment and education domain). The SA of an early draft recommended that the policy could secure training for local people which would support access to training and employment and further strengthen positive impacts for this objective and this was added as suggested.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The site does not currently contain any land in (B) employment uses, although it is recognised that a significant amount of health sector jobs are provided on site. The policy will not result in either losses or an increase in employment land in B uses, however will result in development that provides jobs in other services, including those health and care provision, although these are likely to be those that are in existence already on site.	I	P

### Overall summary

- The policy was found to have potential for significant positive effects for the housing and health objectives. The policy should lead to provision of a significant amount of housing, including affordable housing. The policy should help to deliver some of the wider determinants of health, should improve access to modernised health facilities, may encourage active travel and should provide opportunities for physical activity and community interaction, all supporting health.
- The policy was found to have potential for positive effects for the open space, heritage, flood risk, climate change adaptation, waste, best use of land, access to services, community safety, equalities and employment objectives. The policy should lead to protection and improvement of existing on site open space and improve access to children’s play-space within the area. The policy should lead to the preservation and enhancement of on-site heritage assets. Retention of open space can help manage flood risk, and supporting text was amended following earlier SA recommendation to promote use of SUDS

within open spaces, which will help manage flood risk. The policy should lead to protection of areas of green infrastructure that support climate change adaptation. The policy supports the conversion of some of the buildings on site, helping to conserve resources and reduce waste. The policy should deliver a wide range and amount of uses and make better use of the site. The policy should deliver improved/modernised health and care facilities as well as new community facilities. The policy may provide opportunities for community interaction and opportunities for passive surveillance, as well as improve safety for pedestrians and cyclists accessing the site. The policy should deliver a proportion of affordable housing, supporting equalities, and following an SA recommendation, should secure training for locally education/employment deprived communities. The policy should enable provision of jobs in various sectors on site.

- The policy was found to have potential for mixed (adverse and positive) effects for the transport and air quality objectives. The policy should lead to improvements in sustainable transport which may influence travel choice. However, the amount and types of development proposed is likely to result in an increase in vehicle movements in the area, compared with existing amounts, and this may also impact upon air quality.
- The policy currently has no impacts on some objectives including biodiversity, SDNP, water quality, energy consumption and soil quality due to lack of site constraints relating to these objectives. Impacts on these objectives are largely addressed through implementation of CPP1 policies.

#### **Recommendations:**

- The initial SA of an early draft of the policy found the impacts on the flood risk objective to be mixed and recommended the supporting text could refer to opportunities to incorporate SUDS within the open space and landscaping improvements. This recommendation was implemented and this changed the score to a positive impact.
- The initial SA also found that the positive score against the equalities and social inclusion objective could be strengthened by adding a requirement for development to provide training opportunities to increase skills locally. This recommendation was implemented as suggested.
- The initial SA also sought clarification over wording relating to sustainability of the listed building. This wording was removed.

#### **Other mitigation**

- The amount of development could result in an increase in vehicle movements in this location. A Transport Assessment would need to be submitted as part of a planning application to fully assess the impacts of development. Other adopted policy would apply, including CP9 Sustainable Transport and SPD14 Parking Standards which should help to ensure an appropriate amount of parking is provided in relation to the site's location and emerging CPP2 policy should address air quality issues. This should help to minimise any adverse transport and air quality impacts.

## CPP2 Policy Appraisal: SSA2 Combined Engineering Depot, New England Road

### Options Stage

- Option 1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)
- Option 2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites
- Option 3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site

**This policy is reflective of option 3.**

### Assumptions

- The policy will not repeat anything of a strategic nature that is already included in CPP1 and CPP1 policy requirements will be implemented, including those relating to DA4 which covers the wider area
- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The site itself is a PDL site and is unlikely to have little current potential for biodiversity on site. The site is in fairly close proximity to the Brighton Station SNCI and could result in an increase in recreational pressure to this site. The policy specifically requires green infrastructure and biodiversity in the area to be enhanced through development, and includes a reference to the Brighton Station Greenway in the supporting text, which should have positive impacts on this objective and will provide an opportunity to achieve net gains on site.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The site does not contain any designated areas of open space. The site is in fairly close proximity to the Brighton Station Greenway which is designated open space of the natural/semi-natural typology. The policy specifically requires green infrastructure in the area to be enhanced through development, and includes a reference to the Brighton Station Greenway in the supporting text, which should have positive impacts on this objective by supporting improvements to existing open space.	D	P

3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There are no additional policy requirements relating to landscape within the policy. The site is within the central urban area. Therefore there are no direct impacts on this objective by the policy itself.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The site is close in proximity to the listed Brighton Station, the listed Railway Viaduct and adjacent to the West Hill Conservation Area. The policy has specific requirements relating to building heights and massing which should ensure the scale and size of new developments do not interrupt strategic views across the city (e.g. from the Conservation Area) and protects the settings of nearby heritage assets. Additionally, the policy requires improvements to the pedestrian environment along New England Road, which should help to improve the streetscape in this area which is currently poor.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	The site is in current active use and will already generate a certain amount of traffic. The site is located in an area that suffers from congestion. The amount of development proposed for the site could result in an increase in vehicle movements above that which the site already generates due to the increased amount of development proposed. However the site has good access to existing sustainable transport and may have potential for car-free housing due to its location, although this would need further assessment through a transport assessment. The policy requires improvements to sustainable transport infrastructure, including pedestrian and cyclist access to the site, which could influence travel choice. The policy also requires improvements to the pedestrian environment along New England Road which could help facilitate access on foot. Overall, although the policy includes measures that may influence travel choice, the amount of development could increase vehicle movements and impacts are therefore considered to be mixed. See mitigation.	D	P/T
6. To improve air and noise quality	-/+	-/+	-/+	The site suffers from high levels of noise predominantly from the railway which could impact upon occupier amenity and health. The policy should address noise impacts, as includes specific requirements relating to achieving a high quality amenity in response to the close proximity of the railway lines. The site is located within the AQMA. The adjacent streetscape on New England	D	P/T

				<p>Road may inhibit dispersal of air pollutants. The policy doesn't include any specific requirements relating to air quality. It is acknowledged that the current uses on the site will already generate a certain amount of traffic, however the amount of development proposed for the site could result in an increase in vehicle movements that may result in an impact on localised air quality.<sup>22</sup></p> <p>It is recognised that CPP1 DA4 policy includes a requirement for development to take into account local air quality and seek improvements where possible, however as air quality is an issue in the area and as the amount of development may cause an increase in vehicle movements, the policy currently is considered to have potential adverse and uncertain effects on air quality. Overall impacts for this objective (noise and air quality) are mixed. See mitigation/recommendation.</p>		
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>The site is not within a GSPZ.</p> <p>There are no additional specific policy requirements relating to water quality or resources within the policy. CPP1 CP8 sets the standards relating to water quality and consumption for both new build residential and non-residential development which would be applied.</p> <p>Overall the policy itself is considered unlikely to have any additional impacts on this objective. Any new development on site is likely to achieve greater water efficiency than the existing premises.</p>		
8. To reduce the risk from all sources of flooding to and from development	0	0	0	<p>The majority of the site has no risk of surface water flooding or groundwater flooding. The entire site is PDL and of a completely urbanised form.</p> <p>Development on the site will therefore not result in an increased in urbanised environment and is unlikely to increase the risk of flooding. There are no additional specific policy requirements relating to flood risk. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this. Overall the policy itself is considered unlikely to have any additional impacts on this objective.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. It is noted that the site is within the New</p>		

<sup>22</sup> Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance on 'Land-Use Planning & Development Control: Planning For Air Quality' suggests that significant impacts are likely where a development causes a change in daily light vehicle flows of 100 AADT within an AQMA.



				England Quarter & London Road Heat Network Opportunity Area and policy requirements of DA4, relating to the incorporation of heat network infrastructure, would apply to development on this site. CPP1 CP8 sets the standards relating to energy consumption for both new build residential and non-residential development which would be applied. Overall the policy is considered unlikely to have any additional impacts on this objective. Any new development on site is likely to achieve a much greater energy efficiency than the existing premises.		
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	Site is PDL with no green infrastructure on site. Development in this location is considered unlikely to contribute towards worsening the urban heat island effect or other effects associated with climate change. The policy specifically requires green infrastructure in the area to be enhanced through development which should have positive impacts on this objective.	I	P
11. To improve soil quality	0	0	0	The site may have potential for contamination however this is unknown at this stage. Any contaminated land would require remediation in accordance with other CPP1 policy. The policy itself does not include any additional specific policy requirements relating to land contamination and remediation. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
12. To minimise and sustainably manage waste	0	0	0	Redevelopment of the site would not present the opportunity to convert any of the existing buildings and therefore will result in production of waste. Requirements relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan, and therefore the policy itself does not include any additional specific policy requirements relating to waste reduction. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
13. To make the best use of land available	+	+	+	The policy requires provision of a minimum of 100 dwellings and minimum of 1,000sqm B1 employment workspace and starter units. This will be a significant increase in the amount of development currently provided on site and will make better use of the site and contribute towards meeting citywide needs. Delivery of new workspace that can provide for modern employment needs may support a greater number of jobs on the site than that already provided. Delivery of 100 dwellings would equate to a whole site density of 71dph, which is lower than that required for development areas, however reflects the constrained nature of	D	P

				the site and the other uses to be delivered on site which would reduce the land available for housing. Overall impacts should be positive.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy requires a minimum of 100 dwellings to be delivered on site. This should include 40% affordable housing which would equate to 40 units. The policy would therefore make a significant contribution to local housing need.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy does not include provision of any services e.g. community facilities, therefore no services will be increased as a result of the policy. However the policy should lead to improvements in access to and from the site, including for cyclists and pedestrians, and therefore facilitate access to other nearby services.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The site suffers from high levels of noise predominantly from the adjacent railtrack. The WHO suggests that continued exposure to noise over 55dcbLs can have a detrimental effect on health. The policy should address noise issues, as includes specific requirements relating to achieving a high quality amenity in response to the close proximity of the railway lines. The site is within the AQMA and air pollutants can have a detrimental impact on respiratory health – see recommendation relating to Objective 6. Policy should result in provision of housing and employment opportunities, both of which are wider determinants of health. Policy requires improvements to pedestrian and cyclist access, which could help to encourage active forms of travel, having health benefits and also helps to facilitate access to wider services, also positively impacting upon health. Overall impacts on health are considered to be positive.	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Provision of mixed uses can help support community safety by providing opportunities for passive surveillance. The policy requires improvements to the pedestrian environment along New England Road including lighting which can help reduce the fear of crime and may support improved road safety. The policy also requires safe pedestrian and cycle access to the site, which should also support road safety. Impacts should be positive.	I/D	P
18. To increase equality and social inclusion	+	+	+	Provision of housing will include a proportion of affordable units in accordance with CPP1 CP20 which will support people on lower incomes. The policy also requires the developer to enter into a training place agreement for local people. This should help to increase skills and employment opportunities, and may be of particular benefit for locally deprived communities	D	P

				(site is in close proximity to some SOAs within 20% most deprived employment/education domains).		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The entire site is currently in sui generis uses and comprises some fairly dated warehouse and office developments. The policy requires delivery of a minimum 1,000sqm B1 employment floorspace, including managed starter units. The policy should help increase supply of employment land in the city and help to meet the needs of various businesses, including start-ups and should provide workspace that helps meet modern employment needs. The requirement to secure training for local people would also help to increase skills. Overall, impacts should be significantly positive.	D	P

### Overall Summary

- The policy was found to have potential for significant positive effects for the housing and employment objectives. The policy should lead to provision of new housing, including affordable housing. The policy should contribute towards increasing supply of employment space through provision of new B1 employment floorspace that can better meet modern employment needs, including some start-up units. The policy should also support local people to gain training and skills, thus improving local employability.
- The policy was found to have positive effects for the biodiversity, open space, heritage, climate change adaptation, best use of land, access, health, community safety and equalities objectives. The policy should result in enhanced green infrastructure and biodiversity, including the Brighton Station Greenway impacting positively on biodiversity, open space and also climate change adaptation. The policy should result in development of an appropriate scale that respects nearby heritage assets. The policy should lead to delivery of increased amounts of development on the site, helping to make better use of land available. The policy should lead to improved pedestrian and cyclist access to the site, helping to improve access to the wider area and also potentially benefiting health, as does the delivery of housing and employment opportunities which are wider determinants of health, and should help to minimise any railway noise impacts which could adversely affect health. Delivery of mixed uses can help increase opportunities for passive surveillance, and the policy requirements for improvements along New England Road, including measures such as lighting, contribute towards community safety. Delivery of affordable housing and training opportunities could help reduce deprivation.
- The policy was found to have mixed adverse/positive impacts for the objectives for transport and air/noise quality. It is recognised that the policy should result in measures such as improved sustainable transport infrastructure, safe pedestrian and cyclist access and improvements to the adjacent pedestrian environment leading to the site, all of which could influence travel choice. However the amounts of development could result in an increase in transport movements in this location, which already suffers from congestion. The policy requires development to address any noise/vibration issues from the adjacent rail-track which should ensure future occupants' amenity is protected having positive impacts on the air/noise quality objective. The amount of development may lead to an increase in daily vehicle movements which could significantly impact upon air quality within the AQMA.

### Mitigation

The amount of development could result in an increase in vehicle movements in this location, which is an area that already suffers from congestion. A Transport Assessment would need to be submitted as part of a planning application to fully assess the impacts of development. Other adopted policy would apply, including CP9 Sustainable Transport and SPD14 Parking Standards which should help to ensure an appropriate amount of parking is provided in relation to the site's location and emerging CPP2 policy should address air quality pollution issues. This should help to minimise any adverse transport impacts.

### Recommendations

The SA of an earlier iteration suggested that the policy could incorporate a reference relating to addressing air quality to highlight the importance of this issue in this area. The supporting text was amended to incorporate this suggestion.

### CPP2 Policy Appraisal: SSA3 Land at Lyon Close, Hove

#### Options Stage

- Option 1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)
- Option 2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites
- Option 3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site

**This policy is reflective of option 3.**

#### Assumptions

- The policy will not repeat anything of a strategic nature that is already included in CPP1 and CPP1 policy requirements will be implemented
- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There are no additional policy requirements relating to biodiversity within the policy. There are no sites of nature conservation importance on or adjacent to the site and development is unlikely to have any effect on those nearest to the site as they are located some distance away. The site is entirely PDL and is		

				not considered to have much potential for biodiversity. Net gains in biodiversity could be achieved on site through implemented of CPP1 CP10. Therefore there are no direct impacts on this objective by the policy itself.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	There is currently no open space on the site. The policy requires development to provide shared amenity space, which should increase provision of this type of open space. The supporting text also refers to opportunities to improve the public realm, including through street trees, which would increase green infrastructure. Impacts should be positive.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There are no additional policy requirements relating to landscape within the policy. The site is within the central urban area. Therefore there are no direct impacts on this objective by the policy itself.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	Part of the western edge of the site is immediately opposite the eastern edge of the Willet Estate Conservation Area. This part of the site is occupied by Spitfire House, 141 Davigdor Road, which is put forward for retention meaning that this building itself is unlikely to be replaced with a new building. Development across the rest of the site is unlikely to have an adverse impact on the Conservation Area and the policy requirements for improvements to public realm and for development to be coherent should have a positive impact on streetscape/townscape.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	The site is in current active use and will already generate a certain amount of traffic. The amount of development proposed for the site could result in an increase in vehicle movements above that which the site already generates due to the increased amount of development proposed. However the site has good access to existing sustainable transport and may have potential for car-free housing due to its location, although this would need further assessment through a transport assessment. The policy requires improvements to sustainable transport infrastructure, including pedestrian and cyclist access to the site, which could influence travel choice. Overall, although the policy includes measures that may influence travel choice, the amount of development could increase vehicle movements and	D	P

				impacts are therefore considered to be mixed. See mitigation.		
6. To improve air and noise quality	-/+	-/+	-/+	The northern part of the site adjacent to the railway suffers from high levels of railway noise which could impact upon occupier amenity and health. An earlier draft of the policy had no requirements relating to noise amenity, and the SA recommended adding ad requiring which was added as suggested. The site is not within nor adjacent to the AQMA, however the AQMA is located approximately 600m from the site (at Seven Dials), although the site can be accessed via alternative routes. The amount of development proposed for the site could result in an increase in vehicle movements that may result in an impact on localised air quality. <sup>23</sup> However it is noted that the policy includes requirements that should improve sustainable transport provision which could influence travel choice and accessible location could influence car ownership. Impacts considered to be mixed.	I	T/P
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	The site is not within a GSPZ. There are no additional specific policy requirements relating to water quality or resources within the policy. CPP1 CP8 sets the standards relating to water quality and consumption for both new build residential and non-residential development which would be applied, and conversions would need to demonstrate how water resources are conserved. Overall the policy is considered unlikely to have any additional impacts on this objective.		
8. To reduce the risk from all sources of flooding to and from development	-	-	-	The site has a risk of surface water and groundwater flooding. The entire site is PDL and of a completely urbanised form. Development on the site will therefore not result in an in increased in urbanised environment and is unlikely to increase the risk of flooding. There are no additional specific policy requirements relating to flood risk. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on		

<sup>23</sup> Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance on 'Land-Use Planning & Development Control: Planning For Air Quality' suggests that significant impacts are likely where a development causes a change in daily light vehicle flows of 500 annual average daily total (AADT) outside of an AQMA, or 100 AADT within an AQMA.

				implementing this. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area. CPP1 CP8 sets the standards relating to energy consumption for both new build residential and non-residential development which would be applied, and conversions would need to demonstrate how energy consumption is reduced. Overall the policy is considered unlikely to have any additional impacts on this objective.		
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	Site is PDL with no green infrastructure on site. Development in this location is considered unlikely to contribute towards worsening the urban heat island effect or other effects associated with climate change. The supporting text refers to opportunities to improve townscape, e.g. through planting of street trees, which would support climate change adaptation and should have positive impacts on this objective.	I	P
11. To improve soil quality	0	0	0	The site may have potential for contamination, based on some existing industrial uses, however this is unknown at this stage. Any contaminated land would require remediation in accordance with other CPP1 policy. The policy itself does not include any additional specific policy requirements relating to land contamination and remediation. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
12. To minimise and sustainably manage waste	0	0	0	Total redevelopment of the various buildings on the site is anticipated, with the exception of Spitfire House, and therefore this does not present the opportunity to convert any of the existing buildings and therefore will result in production of waste. Requirements relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan, and therefore the policy itself does not include any additional specific policy requirements relating to waste reduction. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
13. To make the best use of land	+	+	+	The policy requires delivery of 200 homes and 5,700sqm B1a office	D	P

available				<p>floorspace. Redevelopment of the site may result in actual net losses in certain types of employment floorspace (including B1 and B8), however could deliver higher density development in terms of the numbers of jobs that can be supported through delivery of modern employment floorspace that is better suited to meet modern employment needs. There are currently no residential dwellings on site, and delivery of 300 dwellings could result in a site density of around 95dph which exceeds the density targets required in CPP1. Overall, the combination and amount of uses on the site should help to maximise the efficient use of land.</p>		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	<p>The policy requires delivery of 300 dwellings, which should result in 120 affordable units. The policy would therefore result in a significant contribution towards local housing need.</p>	D	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	<p>The policy requires delivery of expanded D1 health facilities and community uses, subject to need, and also ancillary retail which would increase provision within the area and increase access to these services. The policy also requires pedestrian and cyclist access to be improved which should also help facilitate access throughout the wider area.</p>	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	<p>The policy requires provision of amenity space and potentially community facilities, which can help support community interaction, contributing towards health. Provision of new/extended health facilities will facilitate access to health provision. Policy should result in provision of housing, and employment opportunities, both of which are wider determinants of health. Policy also requires improvements to pedestrian and cyclist access, which could help to encourage active forms of travel, also having health benefits. The policy also now includes a requirement which should protect occupiers from noise issues, also supporting health.</p>	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>Provision of mixed uses can help support community safety by providing opportunities for passive surveillance. The delivery of shared amenity space and community facilities would facilitate community interaction which also supports improving community safety. The policy also requires improvements to pedestrian and cyclist access which should also support road safety. Impacts should be positive.</p>	I/D	P
18. To increase equality and social	+	+	+	<p>Provision of housing including a proportion of affordable housing in</p>	D	P



inclusion				accordance with CPP1 CP20 would support people on lower incomes. The policy requires developers to enter into training place agreements to secure training for local people, which will help facilitate access to learning and employment, although it is recognised that this might not be for people within the local area, as the area does not suffer from high levels of employment or education deprivation.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	Although redevelopment across the site will result in some net losses in B1a and B8 uses, the policy will result in delivery of 5,700m2 new B1 floorspace which will provide a significant contribution towards new employment floorspace needs in the city. Floorspace provided should be better able to meet modern employment needs, including being flexible and providing affordable workspaces, and loss the B8 and replacement with B1 should increase jobs density on this part of the site in particular. The policy should also result in delivery of other uses which provide employment opportunities. The policy should also lead to increased skills and jobs for local people. Impacts anticipated to be positive overall, however may not be significantly positive due to overall net loss of employment floorspace anticipated.	D	P

### Overall Summary

- The policy was found to have potential for significant positive effects for the housing, health and access objectives. The policy should lead to provision of new housing, including affordable housing. The policy should result in an increase in some services/facilities, including health and community facilities, and improve pedestrian/cyclist access to the site. The policy should lead to delivery of housing and employment opportunities, which are wider determinants of health, should increase pedestrian and cyclist access to the site which could help facilitate active travel and should increase access to health provision.
- The policy was found to have potential for positive impacts for the open space, heritage (streetscape), climate change adaptation, community safety, best use of land, equalities and economic development objectives. The policy should result in delivery of amenity space, increasing provision of this type of open space. A more coherent redevelopment across the site should lead to improvements to townscape and streetscape. Planting of street-trees could help support climate change adaptation. Delivery of a mixed use scheme, as well as shared amenity space and community facilities could help increase passive surveillance, provide opportunities for community interaction and support community safety. The policy should result in a higher density development than currently exists on site and should exceed housing density targets, helping to maximise land use efficiency. Delivery of affordable housing and training opportunities could help reduce deprivation. The policy should contribute towards increasing supply of new employment floorspace more able to meet modern employment needs, and although it is recognised that there will be a net loss of employment floorspace on site, this should be mitigated by the potential to increase job density across the site.

- The policy was found to have mixed adverse and positive impacts for the objectives for transport and air/noise quality. The amounts of development could result in an increase in transport movements in this location, although it is recognised that the policy requires improvements to sustainable transport infrastructure, including pedestrian and cyclist access to the site, which could influence travel choice. The site is situated outside the AQMA however could result in an increase in vehicle movements which has a detrimental effect on local air quality. The site is situated adjacent to the railways lines, which produce a significant level of noise, and following SA recommendation the policy was amended to include a requirement relating to this.
- The policy could have adverse impacts on flooding, as the site has risk of surface water and groundwater flooding.

### **Recommendation**

- The initial SA of an early draft of the policy recommended the policy should include a requirement to address noise issue from the adjacent railway and this was added as suggested having both health and noise quality benefits.

### **Other Mitigation**

- The amount of development could result in an increase in vehicle movements in this location. A Transport Assessment would need to be submitted as part of a planning application to fully assess the impacts of development. Other adopted policy would apply, including CP9 Sustainable Transport and SPD14 Parking Standards which should help to ensure an appropriate amount of parking is provided in relation to the site's location. This should help to minimise any adverse transport impacts and emerging CPP2 policy should address air quality issue. This should help to minimise any adverse transport and air quality impacts.
- Any flood risks would need to meet the requirements of CPP1 CP11 as well as emerging CPP2 policy on SUDS which should address flood risks.

### **CPP2 Policy Appraisal: SSA4 Sackville Trading Estate and Coal Yard, Hove**

#### **Options Stage**

- Option 1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)
- Option 2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites
- Option 3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site

**This policy is reflective of option 3.**

## Assumptions

- The policy will not repeat anything of a strategic nature that is already included in CPP1 and CPP1 policy requirements will be implemented, including those relating to DA6 which covers the wider area
- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There are no additional policy requirements relating to biodiversity within the policy. There are no sites of nature conservation importance on or adjacent to the site and development is unlikely to have any effect on those nearest to the site. The site is entirely PDL and is not considered to have much potential for biodiversity. Net gains in biodiversity could be achieved on site through implemented of CPP1 CP10. Therefore there are no direct impacts on this objective by the policy itself.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	The policy does not contain any areas of designated open space, e.g. that would be lost, and the policy requires a children's play space or informal multi-use sports area to be delivered as part of a scheme, which will lead to an increase in this type of open space. The policy also requires delivery of a public square which could include opportunities for green infrastructure. Overall the policy is considered to have positive impacts on this objective as should help to increase open space provision within the area.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There are no additional policy requirements relating to landscape within the policy. The site is within the central urban area. Therefore there are no direct impacts on this objective by the policy itself.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	0	0	0	The site does not contain any heritage assets and is not adjacent to any heritage assets. Development in this location is considered unlikely to have any impacts upon heritage assets. There are no additional policy requirements relating to heritage assets within the policy. CPP1 CP15 sets the strategic requirements relating to heritage.		

				Overall the policy is considered unlikely to have any additional impacts on this objective.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	<p>Some of the units are still in active uses and the site will already generate a certain amount of traffic. The site is located close to a junction that suffers from congestion at peak times.</p> <p>The amount of development proposed for the site is highly likely to result in an increase in vehicle movements above that which the site already generates.</p> <p>The site has good access to some forms of sustainable transport, including buses and the policy requires improvements to pedestrian links which should facilitate access on foot, in particular improving links to Hove Station.</p> <p>Following SA recommendation on an early draft, the policy now also requires improvements to other forms of sustainable transport, including for cyclists.</p> <p>Overall, although the policy includes some measures that may influence travel choice, the amount of development could increase vehicle movements and impacts are therefore considered to be mixed. See mitigation and recommendations.</p>	D	P
6. To improve air and noise quality	-/+	-/+	-/+	<p>Parts of the site suffer from high levels of noise from either road or railway which could impact upon occupier amenity and health. The policy should address noise impacts, as includes specific requirements relating to achieving a high quality amenity, particularly in response to the close proximity of the railway lines.</p> <p>Parts of the site are located within the AQMA and the only road access to the site is through the AQMA. The policy doesn't include any specific requirements relating to air quality. The amount of development proposed for the site could result in an increase in vehicle movements that may result in an impact on localised air quality.<sup>24</sup></p> <p>It is also recognised that the supporting text refers to the AQMA and cross references to emerging CPP2 policy on pollution control. The SA of an earlier iteration suggested that this reference could be strengthened and included</p>	D	T/P

<sup>24</sup> Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) guidance on 'Land-Use Planning & Development Control: Planning For Air Quality' suggests that significant impacts are likely where a development causes a change in daily light vehicle flows of 100 AADT within an AQMA.

				<p>within the policy text, however it was considered that other adopted and emerging policy addressed this issue.</p> <p>Overall impacts for this objective (noise and air quality) are mixed. See mitigation/recommendation.</p>		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>The site is within GSPZ1 and GSPZ2 therefore development in this location could present a risk of pollution to groundwater resources e.g. through dispersal of pollutants. There could be a considerable risk with regards to the coalyard site which has potential for contamination.</p> <p>An SA on an early draft found that there was no reference to the GSPZ within the policy nor supporting text and recommended that a reference to the GSPZ could be included within the supporting text, particularly due to the potential for land contamination. This suggestion was added as suggested and the score amended from negative to positive.</p>	I	T/P
8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>The majority of the site has no risk of surface water flooding. Groundwater levels are between 0.5 and 5m below surface and therefore there could be a risk of ground water emergence.</p> <p>The entire site is PDL and of a completely urbanised form. Development on the site will therefore not result in an increased in urbanised environment and is unlikely to increase the risk of flooding. There are no additional specific policy requirements relating to flood risk. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this. Overall the policy itself is considered unlikely to have any additional impacts on this objective.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. It is noted that the site is within the Hove Park Heat Network Opportunity Area and policy requirements of DA6, relating to the incorporation of heat network infrastructure, would apply to development on this site.</p> <p>CPP1 CP8 sets the standards relating to energy consumption for both new build residential and non-residential development which would be applied. Overall the policy is considered unlikely to have any additional impacts on this objective. In addition, any new development on site is likely to achieve a</p>		

				much greater energy efficiency than the existing premises.		
10. To increase the city's resilience and ability to adapt to climate change	0	0	0	Site is PDL and of low flood risk. Development in this location is considered unlikely to contribute towards worsening the urban heat island effect or other effects associated with climate change. The policy does not include any specific requirements relating to green infrastructure or other measures that could help with climate change adaptation. Therefore there are no direct impacts on this objective by the policy itself. CPP1 CP8 requires all development to address climate change adaptation which would be applied.		
11. To improve soil quality	+?	+?	+?	There are no specific policy requirements relating to improving soil quality or contaminated land. However some of the site has potential for land contamination based on current uses, e.g. the coalyard. Therefore development of the site should lead to the improvement of soil quality and impacts should be positive if contamination is found. The supporting text could refer to this however as there is some uncertainty regarding contamination this is better addressed through CPP1 CP8 as well as emerging CPP2 policy.	D	P
12. To minimise and sustainably manage waste	0	0	0	Redevelopment of the site would not present the opportunity to convert any of the existing buildings and therefore will result in production of waste. Requirements relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan, and therefore the policy itself does not include any additional specific policy requirements relating to waste reduction. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
13. To make the best use of land available	++	++	++	The policy requires provision of a minimum 500 dwellings, 6000m2 employment floorspace as well as other uses and open space. This would be a significant increase in the amount of development currently provided on site and will make better use of the site, particular as many of the units are currently vacant. Delivery of 500 dwellings would equate to a site density of 310dph which exceeds City Plan targets for development within Development Areas. Overall impacts should be significantly positive.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy requires a minimum of 500 dwellings to be delivered on site. This should include 40% affordable housing which would equate to 200 units. The policy would therefore make a significant contribution to local housing need.		

15. To improve the range, quality and accessibility of services and facilities.	++	++	++	The policy should increase provision of services, including ancillary retail, as well as community facilities if needed. The policy should also improve pedestrian access to the site and potentially improve access to Hove Station, benefitting the wider community.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The site suffers from high levels of noise predominantly from the adjacent railtrack. The WHO suggests that continued exposure to noise over 55dcbLs can have a detrimental effect on health. The policy should address noise issues, as includes specific requirements relating to achieving a high quality amenity in response to the close proximity of the railway lines. The site is within the AQMA and air pollutants can have a detrimental impact on respiratory health – see recommendation relating to Objective 6. Policy should result in provision of housing and employment opportunities, both of which are wider determinants of health. Policy requires improvements to pedestrian access, which could help to encourage active forms of travel, having health benefits and also helps to facilitate access to wider services, also positively impacting upon health. Overall impacts on health are considered to be positive. Impacts could be strengthened through including a reference to other forms of active travel, such as cycling. See recommendation relating to objective 5.	D	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	Provision of mixed uses can help support community safety by providing opportunities for passive surveillance. The delivery of a public square would facilitate community interaction which also supports improving community safety. The policy also requires improvements to pedestrian permeability which should also support road safety. Impacts should be positive.	I/D	P
18. To increase equality and social inclusion	+	+	+	Provision of housing will include a proportion of affordable units in accordance with CPP1 CP20 which will support people on lower incomes. The SA of an early draft found that the policy did not include a reference which requires developers to enter into training place agreements and it was recommended to include this as would be of particular benefit for locally deprived communities (site is in close proximity to some SOAs within 30% most deprived employment/education domains). Recommendation added as suggested. .	D	P
19. To contribute towards the growth	++	++	++	The policy will result in loss of some A1, B1c and B8 uses however will result	D	P

of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.			in delivery of 6,000m <sup>2</sup> new B1 floorspace which will provide a significant contribution towards employment floorspace needs in the city. The policy should also result in delivery of other uses which provide employment opportunities. Impacts should be significantly positive. Positive impacts strengthened by including the recommendation to include training for local people.		
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### Overall Summary

- The policy was found to have potential for significant positive effects for the housing, employment, best use of land and access objectives. The policy should lead to provision of new housing, including affordable housing. The policy should help to regenerate a partially vacant site and should significantly exceed density targets. The policy should result in an increase in some services/facilities and improve pedestrian access to the site. The policy should contribute towards increasing supply of employment space through provision of new B1 employment floorspace that should be able to meet modern employment needs and should help to increase skills and employment opportunities for local people.
- The policy was found to have potential for positive impacts for the open space, water quality, soil quality, health, community safety and equalities objectives. The policy should result in delivery of children’s playspace, increasing provision of this type of open space, as well as a public square and other mixed uses all of which could help increase passive surveillance, provide opportunities for community interaction and support community safety. The site is within Groundwater Source Protection Zones 1 and 2 and following an SA recommendation on an early draft, the supporting text now includes a reference to protection of groundwater. The policy has potential to support remediation of a contaminated site and improve soil quality although this is fairly uncertain and will depend on site investigation. The policy should lead to delivery of housing and employment opportunities, which are wider determinants of health, should increase pedestrian access to the site which could help facilitate active travel and should help to minimise any railway noise impacts which could adversely affect health. Delivery of affordable housing could help reduce deprivation and following SA recommendation, the policy could also help to reduce education and employment deprivation through providing training opportunities.
- The policy was found to have mixed adverse/positive impacts for the objectives for transport and air/noise quality. It is recognised that the policy should result in measures such as improved pedestrian access which could influence travel choice. Following SA recommendation the policy also refers to improvements to other forms of sustainable transport. However despite policy measures, the amounts of development could result in an increase in transport movements in this location, which already suffers from congestion. The policy requires development to address any noise/vibration issues from the adjacent rail-track which should ensure future occupants’ amenity is protected having positive impacts on the air/noise quality objective. The policy does not include any reference to air quality and the amount of development may lead to an increase in daily vehicle movements which could significantly impact upon air quality within the AQMA.
- The policy could have adverse impacts on flood risk as small parts of the site have surface water flood risk, and the site could be at risk of groundwater emergence.
- The policy currently has no impacts on some objectives including biodiversity, SDNP, climate change adaptation, energy consumption and waste. Impacts on these objectives are largely addressed through implementation of CPP1 policies.



## **Mitigation**

- The amount of development could result in an increase in vehicle movements in this location which could impact upon air quality. A Transport Assessment would need to be submitted as part of a planning application to fully assess the impacts of development. Other adopted policy would apply, including CP9 Sustainable Transport and SPD14 Parking Standards which should help to ensure an appropriate amount of parking is provided in relation to the site's location, and emerging CPP2 policy on pollution control. This should help to minimise any adverse transport and air quality impacts.
- Any risk of flooding would be addressed through implementation of CPP1 CP11 Flood Risk as well as emerging CPP2 policy on SUDS.

## **Recommendations**

- The initial SA of an early draft found the policy requirements relating to sustainable transport measures could be strengthened and the policy was amended as suggested.
- The initial SA of an early draft also felt that the reference to air quality could be stronger. However, no change to policy was made as overarching policy in CPP1 CP9 and emerging policy on pollution control is considered to address air quality issues.
- The initial SA also recommended adding a reference to the GSPZ within the supporting text to ensure that groundwater resources are protected from pollution. This was added as suggested.
- The initial SA also recommended that a reference to requires development to enter into training place agreements should be added to strengthen positive impacts for equalities and social inclusion and employment. This was added as suggested.

## **CPP2 Policy Appraisal: SSA5 Madeira Terraces and Madeira Drive**

### **Options Stage**

- Option 1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)
- Option 2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated
- Option 3) Develop further guidance on development within the seafront through a masterplan/ SPD

### **Policy considered to be reflective of option 2**

## Assumptions

- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts, however assumes generic impacts arising from development would be addressed through existing CPP1 and emerging CPP2 policy (e.g. such as any increases in resource use).

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	This part of the seafront includes the Volk Railway SNCI, which forms a narrow strip that extends the entire length of the seafront and adjoins the Black Rock SNCI. The policy requires development to conserve and enhance the biodiversity in the area, and the supporting text refers improving the Green Wall (on the terraces) and areas of ecological importance. Impacts therefore considered to be positive as should result in enhancements to locally designated sites.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	Although the beach and seafront are not designated as open space as such, they form an important part of the open space offer within the city and the openness and offer provided by the beach as a form of open space is recognised in CPP1 SA1. The policy should result in improvements to sustainable transport and improve access to this area of the seafront, including the open space it provides. This is considered to have positive impacts for this objective.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There is no impact on this objective. Site is within the urban area and development in this location should not impact upon the SDNP.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	++	++	++	Madeira Terrace is a grade II listed structure including 151 arches, promenade with raised walkway and associated buildings and lifts. Madeira Terrace has been closed since 2012 due to the degradation of the structure. The site allocated is also within the East Cliff and Kemp Town Conservation Areas. The policy requires development to contribute towards the wider restoration and repair of the Terraces and access points.	D	P

				The policy should therefore help contribute to conserving heritage assets and their settings, support the integration of new development into the historic built environment and help to improve townscape having potential for significant positive impacts on this objective. Any new development would need to be in accordance with CPP1 CP15 Heritage and emerging CPP2 policies on various heritage assets.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	<p>The policy supports a range of uses being delivered in this location, such as retail, commercial, cultural and leisure, and also supports delivery of a hotel, however does not specify amounts of floorspace, or number of bedspaces. This part of the seafront is already a population destination for both visitors and residents and any increases in various amounts of development may increase visitation to the area, however it is difficult to gauge how people would travel to this location, or whether these types of development would directly increase visitors into the city.</p> <p>Although the policy is likely to result in an increase in uses along this area of the seafront, the policy requires sustainable transport to be provided which should help to facilitate sustainable travel, as well as links and facilities for pedestrians, which may promote active travel. The policy also requires links to the wider area. Public realm improvements should also facilitate sustainable travel. The supporting text also refers to the Coastal Transport System and the England Coast Path. The policy requirements are therefore considered to have positive effects on this objective.</p>	D	P
6. To improve air and noise quality	+	+	+	<p>The AQMA covers a small part of the A259 on the north side of Madeira Terraces. The majority of the site is therefore not adjacent to the AQMA. A significant amount of road noise is generated from traffic on the adjacent A259, however this may not be an issue where non-residential uses are proposed and the supporting text is clear that residential uses will not be permitted in this location.</p> <p>There are no additional policy requirements specifically relating to air or noise quality, however it is recognised that the policy requirements relating to sustainable travel should ensure that air/noise quality does not worsen as a result of increased transport movements. In addition, the location of retail and leisure uses in a cluster away from residential development, can help to</p>	I	T/P

				<p>prevent against any future noise related issues.</p> <p>Overall, the policy is considered to have positive impacts for this objective.</p>		
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>The site is not within a GSPZ.</p> <p>There are no additional specific policy requirements relating to water quality or resources within the policy.</p> <p>CPP1 CP8 sets the standards relating to water quality and consumption for both new non-residential development which would be applied where relevant.</p> <p>Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
8. To reduce the risk from all sources of flooding to and from development	0	0	0	<p>Parts of the beach area are situated within flood zones 2 and 3 (medium/high risk coastal flooding), however the site allocation is not within this area and is within flood zone 1. Parts of Madeira Drive, the terraces and Dukes Mound, all have varying levels of surface water flood risk from low to high risk.</p> <p>There are no additional specific policy requirements relating to flood risk within the policy.</p> <p>CPP1 CP11 Flood Risk requires development to take into account any previous flooding events. Emerging CPP2 policy requires development to take into account coastal conditions, including effects resulting from climate change such as flood risk, and the supporting text includes a cross reference to this policy as well as refers to the need for development to be in accordance with other adopted policies.</p> <p>Overall the policy itself is considered unlikely to have any additional impacts on this objective and any risk of impacts is considered to be addressed through other policy.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area.</p> <p>CPP1 CP8 sets the standards relating to energy consumption for non-residential development which would be applied where relevant.</p> <p>Overall the policy itself is considered unlikely to have any additional impacts on this objective.</p>		
10. To increase the city's resilience	0	0	0	<p>There are no additional specific policy requirements relating to climate change</p>		

and ability to adapt to climate change				adaptation within the policy. CPP1 CP8 requires development to address climate change adaptation and emerging policy on Development on the Seafront requires development to take into account coastal conditions, including effects resulting from climate change and the supporting text includes a cross reference to this policy. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
11. To improve soil quality	0	0	0	The site is not known to be contaminated. There are no additional specific policy requirements relating to remediation of contaminated land or improving soil quality and the policy itself is considered unlikely to have any additional impacts on this objective.		
12. To minimise and sustainably manage waste	+	+	+	The policy supports proposals which seek to repair and restore the Terraces and access points, and would therefore contribute towards bringing the Terraces back into active uses and helps to preserve this structure. This helps to preserve resources having positive impacts on this objective.	I	P
13. To make the best use of land available	+	+	+	The policy supports development which contributes towards the wider restoration of the Terraces and should therefore help to regenerate this area of the city and bring existing resources back into use. This would help to make good use of resources in the city having positive impacts on this objective.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The policy will not result in delivery of housing and the supporting text specifically states that residential uses will not be permitted. Policy therefore has no impacts on this objective.		
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	The policy requires sustainable transport to be provided to help facilitate sustainable travel, including links and facilities for pedestrians which help improve access. The policy also requires access for people with limited mobility to be improved. The policy also supports delivery of a range of uses, including retail, cultural and leisure uses, which will help increase provision in this area. Impacts considered to be significantly positive.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should result in improved access to this area of the seafront, which should help people access the seafront for leisure and recreation purposes, potentially supporting physical activity having benefits for health.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The entire seafront from the pier to the Black Rock Station area is situated within with 10% most deprived SOAs (crime domain). The policy requires	I/D	P

				development to support public realm improvements, including lighting, which can contribute towards reducing the fear of crime and support community safety. In addition, provision of a range of uses can also increase footfall at different times of the day and provide passive surveillance. Impacts considered to be positive.		
18. To increase equality and social inclusion	+	+	+	The policy requires development to improve access to the beach for visitors with limited mobility. This should particularly help people with certain protected characteristics, including older people and disabled people, impacting positively on this objective.	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The seafront is a key destination for visitors and residents, and visitor spend is a significant contributor to the local economy. The policy supports redevelopment of this eastern section of the seafront, through various uses such as retail, leisure and cultural, which should help to ensure the seafront continues to be a year-round destination for tourism, recreation and leisure use. It also supports provision of visitor facilities, such as toilets and shelter also helping to promote tourism. The policy supports delivery of B1 uses which may help to increase employment land supply and supports temporary or pop up uses that can help animate the area on a temporary basis whilst development becomes more established. The policy is therefore considered to contribute significantly towards this objective.	D	P

### Overall Summary

- The policy was found to have significant positive effects for the heritage, access and economic development objectives. The policy supports development that should lead to the repair and restoration of Madeira Terraces, a grade II listed structure which is currently degraded, and should help to bring the arches within it back into active uses. Any improvements to the terraces should also impact positively on the Conservation Areas within which the site is located. The policy should help to improve access to this part of the seafront, both through improvements to structures such as the lifts and esplanade, but also through improvements to sustainable transport, pedestrian facilities and public realm. The policy also supports delivery of a wide range of uses, which would increase provision of certain services in this location. The policy supports redevelopment of this eastern section of the seafront, through various uses such as retail, leisure and cultural, which should help to ensure the seafront continues to be a year-round destination for tourism, recreation and leisure use, having economic benefits.
- The policy was found to have positive impacts across all other relevant objectives including biodiversity, access to open space, transport, air/noise quality, waste, best use of land, health, community safety and equalities. The policy should lead to conservation and enhancement of biodiversity, including locally designated sites; the policy should help to increase and improve access to this part of the seafront, which performs an important function in terms of open

space; the policy should provide improved sustainable transport and promotes active travel to and through the site, which can influence travel choice, also having benefits for health; the policy should ensure that future noise issues do not arise through the clustering of potentially noisy uses together and away from residential development; the policy promotes the repair and restoration of existing buildings, helping to preserve resources and making the best use of resources in the city; the policy should result in improved public realm including lighting and delivery of a wide mix of uses could help provide footfall and passive surveillance at different times, supporting community safety; the policy should lead to improved access to the beach for people with certain protected characteristics including disabled people and older people.

- The policy was found to have no impacts on certain objectives/issues which are of relevance to this site, such as climate change adaptation and flood risk. This is because the policy does not include any specific references to these issues as they are addressed through other existing or emerging policy.

### **Recommendations**

- The initial SA of an early draft suggested that the supporting text could include a reference to supporting implementation of the England Coast Path to further strengthen the positive impact for promoting sustainable travel and supports sustainable access through the seafront. This was added as suggested.

### **CPP2 Policy Appraisal: SSA6 Former Peter Pan Leisure Site, Madeira Drive**

#### **Options Stage**

- Option 1) No detailed development management policy framework to guide development coming forward on the seafront – rely on existing CPP1 (e.g. SA1, CP10, CP11, CP16) and other emerging CPP2 policies (design and heritage)
- Option 2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated
- Option 3) Develop further guidance on development within the seafront through a masterplan/ SPD

#### **Policy considered to be reflective of option 2**

#### **Assumptions**

- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts, however assumes generic impacts arising from development would be addressed through existing CPP1 and emerging CPP2 policy (e.g. such as any increases in resource use).
- As the site is situated within the Madeira Drive area, it is assumed that the policy requirements of SSA5 (Madeira Terraces and Drive) will also be applicable to this site.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The Volk's Railway SNCI lies adjacent to the site. Following SA recommendation, the supporting text was amended to include a reference to the SNCI. Additionally, a new criteria was added to the policy which requires development to conserve and enhance biodiversity in the area. This should have a positive effect on this objective.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	Although the beach and seafront are not designated as open space as such, they form an important part of the open space offer within the city and the openness and offer provided by the beach as a form of open space is recognised in CPP1 SA1. The policy should result in improvements to sustainable transport and improve access to this area of the seafront, including the open space it provides. It is also noted that the site is currently an area of hardstanding, and does not form part of the beach, therefore none of the beach will be lost to future development. This is considered to have positive impacts for this objective.	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There is no impact on this objective. Site is within the urban area and development in this location should not impact upon the SDNP. It is also noted that the supporting text specifies that development should be primarily one storey and not exceed the height of the middle promenade.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The site is located within the setting of the Grade II listed Madeira Terraces and is also within the East Cliff Conservation Area which extends all the way down to the sea. The site comprises an area of hardstanding which currently detracts from the character of the area. The policy requires development to be of a high quality of design which preserves the surrounding and adjacent heritage assets and to preserve the character of the seafront and strategic views. The supporting text specifies that development should be primarily one storey and not exceed the height of the middle promenade, which should help to achieve this objective.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	This part of the seafront is already a population destination for both visitors and residents and any increases in amounts of development may increase visitation to the area, however it is difficult to gauge how people would travel to this location, or whether these types of development would directly increase visitors into the city. Although the policy would result in an increase in uses at this site,	D	P



				the policy requires development to provide for sustainable travel to the site, including having good pedestrian and cycle links. The policy also requires a coordinated approach to public realm improvements to complement improvements across the wider area, which could also help to facilitate sustainable travel. The policy requirements are therefore considered to have positive effects on this objective.		
6. To improve air and noise quality	+	+	+	The site is not within or adjacent to the AQMA. The site is exposed to some road noise originating from the A259, however this may not be such as issue where non-residential uses are proposed. The site is adjacent to other leisure uses, and therefore the clustering of uses together, and away from any residential uses, may help to prevent any future noise issues. Impacts for noise are considered to be positive.	I	P
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	The site is not within a GSPZ. There are no additional specific policy requirements relating to water quality or resources within the policy. CPP1 CP8 sets the standards relating to water quality and consumption for new non-residential development which would be applied where relevant. Overall the policy is considered unlikely to have any additional impacts on this objective.		
8. To reduce the risk from all sources of flooding to and from development	0	0	0	Parts of the beach area are situated within flood zones 2 and 3 (medium/high risk coastal flooding), however the site allocation is not within this area and is within flood zone 1. The site is adjacent to an area which has a low risk of surface water flooding, but the site itself predominantly has no risk of flooding. The site comprises an area of hardstanding, and therefore development of the site would not result in an increase in urbanised area, and is unlikely to increase the risk of flooding. There are no additional specific policy requirements relating to flood risk within the policy. CPP1 CP11 Flood Risk requires development to take into account any previous flooding events. Emerging CPP2 policy requires development to take into account coastal conditions, including effects resulting from climate change such as flood risk, and the supporting text includes a cross reference to this policy as well as refers to the need for development to be in accordance with other		

				<p>adopted policies.</p> <p>Overall the policy itself is considered unlikely to have any additional impacts on this objective and any risk of impacts is considered to be addressed through other policy.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area.</p> <p>CPP1 CP8 sets the standards relating to energy consumption for non-residential development which would be applied where relevant.</p> <p>Overall the policy itself is considered unlikely to have any additional impacts on this objective.</p>		
10. To increase the city's resilience and ability to adapt to climate change	0	0	0	<p>There are no additional specific policy requirements relating to climate change adaptation within the policy.</p> <p>CPP1 CP8 requires development to address climate change adaptation and emerging policy on Development on the Seafront requires development to take into account coastal conditions, including effects resulting from climate change and the supporting text includes a cross reference to this policy.</p> <p>Overall the policy itself is considered unlikely to have any additional impacts on this objective.</p>		
11. To improve soil quality	0	0	0	<p>The site is not known to be contaminated.</p> <p>There are no additional specific policy requirements relating to remediation of contaminated land or improving soil quality and the policy itself is considered unlikely to have any additional impacts on this objective.</p>		
12. To minimise and sustainably manage waste	0	0	0	<p>There are no existing buildings on the site, e.g. that could be repaired and reused. There are not considered to be any impacts on this objective.</p>		
13. To make the best use of land available	+	+	+	<p>The site is situated to the west of the Yellow Wave beach volleyball site, between Madeira Drive and the beach, and consists of an area of hard-standing. The site has remained vacant for some time and currently detracts from the character of the area. Development on this site would help to make the better use of land within the city by helping to regenerate and bring back into use derelict sites.</p>	D	P
14. To provide housing, including affordable housing, to contribute	0	0	0	<p>The site is allocated for leisure or cultural uses. No housing will be delivered on the site.</p>		

towards meeting local needs						
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy requires sustainable transport to be provided which should help facilitate sustainable travel, including links for pedestrians and cyclists which help improve access. The policy also supports delivery of a range of uses, including cultural and leisure uses as well as some ancillary retail, which will help increase provision in this area. Impacts considered to be positive.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Policy supports delivery of leisure uses, which could help increase provision of health-promoting activities in this area. Policy also requires improved access and connectivity to the beach, which could help facilitate access to the sea and beach for recreational purposes, also having health benefits.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The site is situated within with 10% most deprived SOA (crime domain). Provision of additional uses in this area can help to increase footfall at different times of the day and provide passive surveillance, which can support community safety. Impacts considered to be positive.	I/D	P
18. To increase equality and social inclusion	0	0	0	The policy does not include any requirements relating to this objective, however it is noted that the requirements of SSA5 Madeira Terraces and Drive would apply to this site, which requires development to improve access to the beach for visitors with limited mobility. However this is not included explicitly in this policy, and therefore has no impact on this objective.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The seafront is a key destination for visitors and residents, and visitor spend is a significant contributor to the local economy. The policy supports redevelopment of this site through support for uses such as leisure and arts (D2) appropriate to the seafront location. This should increase the offer within the Peter Pan site and help to ensure this part of the seafront continues to be a year-round destination for tourism, recreation and leisure use. Additional offer on the site may also increase footfall to existing adjacent businesses (such as Yellowwave and mini golf, supporting their economic growth. The policy is therefore considered to contribute positively towards this objective.	D	P

### Overall Summary

- The policy was found to have positive impacts across all relevant objectives including open space, heritage, transport, noise quality, making the best use of land, access to services, community safety, and economic development. The policy should help to increase and improve access to this part of the seafront, which performs an important function in terms of open space and also will not result in any loss of the actual beach; the policy should provide improved

sustainable transport and promotes active travel to and through the site, which can influence travel choice, also having benefits for health; the policy should ensure that future noise issues do not arise through the clustering of potentially noisy uses together and away from residential development; the policy should help bring a derelict piece of land back into use; the policy should increase and improve access to the area, as well as result in an increase in provision in this location, also having community safety benefits through increasing footfall; and should help to ensure the seafront continues to be a year-round destination with a wide offer, having economic benefits.

- The policy and supporting text was amended following initial SA assessment to incorporate a requirement to conserve and enhance biodiversity in the area, which resulted in a positive impact for the biodiversity objective.

**Recommendation**

- The initial SA of an early draft of the policy recommended that the supporting text should refer to need to protect the adjacent Volk’s Railway SNCI. This was incorporated as suggested in addition to a new requirement within the policy text relating to protecting and enhancing biodiversity, which resulted in a positive impact.

**CPP2 Policy Appraisal: SSA7 Land Adjacent to American Express Community Stadium, Village Way  
Options Stage**

- Option 1) Do not allocate new sites for employment uses. Allow market to decide.
- Option 2) Allocate new sites for employment uses
- Option 3) Bring forward employment allocations as part of Strategic Mixed Use sites

This policy is considered to be reflective of option 2, however it is noted that employment will also be brought forward in strategic mixed use sites.

**Assumptions**

- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts, however assumes generic impacts arising from development would be addressed (e.g. increased resource use).

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
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1. To protect, conserve and achieve a net gain in biodiversity	+	+	+	The site currently consists of undesignated green space/natural habitat (landscape bund) and some adjacent hard-surfacing that was created as part of the stadium development. It contains no biodiversity designations. The policy requires development to contribute towards Biodiversity Plan objectives, green infrastructure and wider landscaping enhancements through creative landscape solutions (including features such as green walls and green roofs). This should ensure that net gains in biodiversity are achieved through development in this location.	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	0	The site does not comprise an open space designation. There are no impacts on this objective.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	The site is in fairly close proximity to the SDNP and is likely to be within its setting. The policy requires development to preserve and where possible enhance the setting of the South Downs National Park as well as be of a high quality design that respects downland character. This should have positive impacts on this objective.	D	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The site is in fairly close proximity to the Stanmer Park Historic Park & Garden and Conservation Area, as well as listed buildings on the University of Sussex's campus. The policy requires development to preserve and where possible enhance the setting nearby heritage assets. This should have positive impacts on this objective.	D	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	The site has good access to Falmer railway station, as well as regular buses into Brighton and surrounding towns. The policy does not specify an amount of floorspace to be delivered so it is difficult to predict what type of traffic/transport effects development would have in this location. However the policy requires development to be supported by sustainable transport infrastructure which should impact positively on this objective.	D	P
6. To improve air and noise quality	+	+	+	The policy does not indicate the amount of floorspace that it would like to be delivered on the site, and it is therefore difficult to predict the transport	D	P

				<p>impacts, including impacts on air quality, that development would have in this location. However, it is acknowledged that the site is outside the AQMA and therefore would need to produce an average of 500 additional daily vehicle movements to have an adverse effect on air quality in this location.</p> <p>The site has good access to both rail and bus services. The policy requires development to be supported by sustainable transport infrastructure to ensure there is no adverse air quality impact, which should have positive impacts for this objective.</p> <p>Road noise varies from 55-70 decibels across the site from the adjacent A27, and also from the railtrack. However as business uses can often generate significant noise, the location of this site away from major residential areas which already suffers from high levels of noise, could be more suitable for employment uses. Following SA recommendations, the supporting text was amended to include a reference to ensure that developments address noise quality issues, with a cross reference to relevant CPP2 policy, which removes the risk of adverse noise/amenity impacts.</p>		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>The site is within GSPZ 2 and in close proximity to GSPZ 1 and therefore development in this location could present a risk of pollution to groundwater resources e.g. through dispersal of pollutants. It is noted that the policy requires development to meet the priorities within DA3 Lewes Road. Strategic Allocations within DA3 both include a reference to protection of groundwater resources.</p> <p>An earlier iteration of the SA recommended that the policy should also include this reference to GSPZ, and the policy was amended accordingly, which changed the result from negative to positive.</p> <p>Mitigation: also provided through emerging CPP2 policy on Protecting the Water Environment.</p>	I	T
8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>The entire site has varying risk of surface water flooding, from low to high risk. Groundwater levels are between 0.025m and 0.5m which means the site is at risk of groundwater emergence. Development in this location could increase the amount of hard-surfacing and increase flood risk.</p> <p>Mitigation: emerging CPP2 policy on Sustainable Urban Drainage should ensure that impacts are mitigated.</p>	I	T

9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	There are no additional specific policy requirements relating to energy consumption within the policy. CPP1 CP8 sets the standards relating to energy consumption for new build non-residential development which would be applied. Overall the policy is considered unlikely to have any additional impacts on this objective.		
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	Site currently comprises green-space which performs natural functions in terms of temperature regulation and absorption of water. Development of the site therefore may reduce the city's ability to adapt to climate change through change in form from a natural to urbanised form. However the policy includes specific requirements relating to incorporation of green infrastructure and other measures that could help with climate change adaptation. This should have positive impacts on this objective.	D	P
11. To improve soil quality	0	0	0	The site is not known to be contaminated. There are no additional specific policy requirements relating to remediation of contaminated land within the policy and overall the policy itself is considered unlikely to have any additional impacts on this objective. Emerging CPP2 policy on Polluted Sites should ensure that any necessary remediation takes place if required.		
12. To minimise and sustainably manage waste	0	0	0	As the site has no existing buildings on site, development will not be able to re-use any existing buildings or resources on site. Policy unlikely to have any impacts on this objective.		
13. To make the best use of land available	+	+	+	The site is has had an unsuccessful planning application (BH2015/03285) for a hotel including some other uses. The policy may help to facilitate successful planning applications for the site. Delivery of employment and/or health/education uses on the site could help to make good use of an undeveloped site having positive impacts for this objective.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The policy is concerned with the delivery of employment floorspace and health/education floorspace only. The policy therefore does not have any impacts on this objective.		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	Delivery of health/education facilities will help to increase provision and access to these facilities for nearby communities.	I	P
16. To improve health and well-being,	+	+	+	Delivery of health facilities will help to increase provision and access to these	I	P

and reduce inequalities in health				facilities for nearby communities. In addition, delivery of employment floorspace could help to increase access to employment, with access to meaningful employment being one of the wider determinants of health		
17. To improve community safety, and reduce crime and fear of crime	0	0	0	Development of the site would introduce a greater variety of active uses in this location, which can indirectly help support community safety. However it is recognised that the site is within a SOA which does not suffer from high levels of crime deprivation and therefore it is unlikely that development in this location will have any effect on crime levels, or crime based deprivation or community safety. Impacts are negligible.	I	
18. To increase equality and social inclusion	+	+	+	Provision of employment opportunities can help reduce employment and skills based deprivation, which is high within the SOA within which the site is located. The policy requires development to enter in training place agreements, which could help to improve skills and employment prospects. Impacts could be positive depending on take up by deprived communities.	D	T/P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	Policy could lead to an unspecified amount of new B1a employment floorspace. This would increase employment land supply of this type and would contribute towards meeting the development needs of various employment sectors. It could also lead to delivery of health/education floorspace which are significant employers within the city. It could also help support people access meaningful employment. Impacts should be positive.	D	P

### Overall Summary

- The policy was found to have potential for significant positive impacts for the economic development objective as the policy may help to increase employment land supply in the city and thus contributes towards meeting development needs of employment sectors. The policy may also help to increase land supply for education and health purpose, which are also both significant employers in the city.
- The policy was found to have potential for positive impacts for the objectives for biodiversity and climate change adaptation as although development on the site could result in loss of a landscaped bund, policy requirements relating to provision of green infrastructure and achieving biodiversity action plan objectives should mitigate any adverse impacts.
- The policy was found to have potential for positive impacts for the objectives for the SDNP and heritage, as although the site is in fairly close proximity to the SDNP and Stanmer Park heritage assets, the policy requires for development to enhance the surrounding landscape and heritage assets.



- The policy was also found to have potential for positive impacts for the objectives for sustainable transport and air quality, as although new development can increase journeys to a location, the site has good existing access to sustainable transport and the policy requires sustainable transport infrastructure improvements to be provided. The policy was amended following initial SA assessment to incorporate wording relating to addressing noise issues, which impacted positively for noise quality.
- The policy was found to have potential for positive impacts for making the best use of land, access to services, health and equalities. The policy could help bring forward development on an un-used piece of land and make good use of the site; the policy could help to increase access to meaningful employment which is a wider determinant of health as well as increase provision of health facilities; access to training could reduce employment-deprivation through increasing skills, although would be dependent on take-up by deprived communities.
- The policy was amended following initial SA assessment to incorporate wording that was found to impact positively on the objective for water quality, as the site is within a sensitive GSPZ and now the policy requires development to protect groundwater sources.
- The policy could have adverse impacts on the flood risk objective. The site has a low to medium risk of flooding across the majority of the site and development in this location could increase flood risk.

#### **Recommendations**

- The initial SA of an early draft found the impacts on noise to be negative and recommended that the supporting text could cross reference to emerging CPP2 policy on noise nuisance to ensure that noise impacts are addressed, which was incorporated as suggested.
- The initial SA also found the impacts on water quality to be negative due to its location within the GSPZ and recommended that the policy or supporting text included a requirement to protect groundwater sources. This was incorporated as suggested.

Housing Allocations

**H1 Housing Sites and Mixed Use Sites**

**Options Stage – Housing Allocations**

- Option 1: Do not allocate any sites for housing. Rely on market to bring forward suitable sites.
- Option 2: Allocate all sites in SHLAA that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.
- Option 3: Allocate sites in the SHLAA capable of delivering 10+ units, that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.

This policy is considered to be linked to option 3.

**Assumptions**

- This assessment is based on a combination of the individual sites assessments undertaken for each site allocated for housing and mixed use, as well any policy requirements within H1 and is explained further in the commentary.
- Assumed that sites which have a extant planning consent will be built in accordance with that consent
- This policy does not assess some of the indirect impacts associated with housing delivery, for instance, population growth, increased transport movements and increased resource use, as these wider impacts have been assessed under CPP1 CP1 Housing Delivery.

**A summary of the individual site assessments for each of the 45 sites can be found at the end of this appraisal.**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0/+	0/+	+	The majority of the housing and mixed use sites (39 out of 45) are previously developed sites, and at the time of assessment none had a nature conservation designation and are considered unlikely to impact upon biodiversity. All sites could offer potential to achieve net gains. It is recognised that some of the sites (6 out of 45) include green open spaces/large gardens which could have potential for ecological interest, or include trees subject to a TPO, and development on these sites could therefore result in a net loss in biodiversity. However on balance, the policy is more likely to have no impacts or have	I	P

				positive impacts on this objective, particularly in the longer term. Mitigation: Any potential for adverse impacts on biodiversity would be addressed by other policies within CPP1 and CPP2.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	+	The majority of the housing and mixed use sites are previously developed sites that do not contain any open space designations, with only 7 out of 45 sites containing some small areas of designated open space. The majority of the sites are therefore considered to have no impact on this objective, as will not result in loss of open space and are unlikely to result in an increase in open space. Some of the approved planning consents include delivery of small areas of open space, or include a contribution towards improving a local open space which should result in positive impacts in the longer term. Mitigation: Any sites that result in loss of on-site open space or that do not meet their open space requirements on site will be required to make a financial contribution towards improving open space off-site, with the impact therefore becoming more positive in the longer term.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	All sites are within the built-up area boundary. Many are located within a central location, or well within the built up area where there are no landscape sensitivities. 2 out of 45 sites were considered to have potential for landscape sensitivities due to their location on the edge of the built-up-area boundary, however on balance the policy is considered to be neutral overall.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-/+/0	-/+/0	-/+/0	17 out of the 45 sites do not contain nor are in proximity to any heritage designations and are unlikely to have any adverse impact. 18 of the sites contain a heritage asset, are in the setting of a heritage asset, or contain archaeological potential and could therefore have an adverse impact on these assets. The remaining 10 sites are mainly those with an extant planning consent, where the impact upon a heritage asset has been found to be positive. Overall, impacts are considered to be mixed. Any adverse impacts on heritage or archaeology would be addressed through CPP1 CP15 Heritage and emerging CPP2 policies.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable	+	+	+	The majority of the sites (40 out of 45) were considered to have close access to a bus service providing a frequent service every 10 minutes; some sites also	I	P

forms of transport and improve travel choice				<p>have good access to rail services, both of which may influence sustainable travel choice. The majority of sites were also considered to be within desirable or acceptable walking distance from essential services.</p> <p>Some of the sites promote mixed uses, which can help reduce the need to travel.</p> <p>5 sites either did not have access to a regular bus service, or were located some distance from other services which may influence less-sustainable travel choice.</p> <p>On balance, the policy is considered to have positive impacts on this objective as the location of the sites may influence car ownership and reduce the need to travel by car for some journeys, although it is recognised that delivery of over 1,600 dwellings could result in an increase in population and journeys made due to the increased population, however this has been considered under the SA of CPP1.</p>		
6. To improve air and noise quality	-/+	-/+	-/+	<p>16 of the 45 sites were located within or adjacent to the AQMA and also had noise (road/rail) issues; 17 sites had either air or noise issues, but not both. Only 12 of the sites were outside the AQMA and had good noise quality. Sites with air and/or noise issues can impact upon occupiers' health and amenity. Also, development within an area with air quality issues can make the problem worse, due to the potential to increase average vehicle movements. In addition, there could be a cumulative effect on air quality arising from several smaller developments within close proximity to one another, even where the individual effect was found to be acceptable.</p> <p>Overall impacts are considered to be mixed with the positive score reflecting the lack of noise and/or air quality issues on some sites, and the adverse score reflecting the opposite and the risk that some sites could generate air quality issues.</p> <p>Mitigation would be provided by CPP1 CP9 Sustainable Transport policy, emerging CPP2 policy on Transport and Travel and Protection of the Environment &amp; Health.</p>	I	T
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>37 of the 45 sites are not within a GSPZ; 8 of the sites are within a GSPZ. Development could impact upon water quality where located within the GSPZ however on balance the policy is considered to have an overall neutral impact</p>	I	P

				<p>on this objective, through the avoidance of sensitive groundwater source protection zones.</p> <p>Any potential for adverse impacts on water quality would be addressed by emerging CPP2 policy Protection of the Water Environment.</p>		
8. To reduce the risk from all sources of flooding to and from development	-/+	-/+	-/+	<p>19 out of 45 sites have no risk of any form of flooding.</p> <p>1 of the sites has a risk of tidal flooding; 23 out of 45 sites have a risk of SW flooding; 17 out of 45 sites have a risk of GW flooding. 14 out of 45 sites have both surface water and groundwater flood risk</p> <p>Overall, the impacts are considered to be mixed, with over half the sites having a risk of at least 1 form of flooding.</p> <p>The risk of on-site flooding and increasing flooding elsewhere would be addressed through emerging CPP2 policy Sustainable Drainage and CPP1 CP11 Flood Risk.</p>	I	P
9. To reduce emissions of greenhouse gases that cause climate change	-/+	-/+	-/+	<p>29 of the 45 sites were located within heat cluster opportunity areas and may therefore have potential to connect to future networks where provided, helping to mitigate climate change impacts. 16 of the sites are located outside these areas and are unlikely to be able to connect due to their location.</p> <p>Overall impacts are considered to be mixed. Mitigation would be provided through CPP1 policy CP8 which requires certain sustainable buildings standards, and through emerging CPP2 policy on Energy Efficiency &amp; Renewables.</p>	I	P
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	<p>The majority of the sites (39 out of 45) consist of previously developed land, comprising existing buildings or cleared ground which does not contain green infrastructure. 6 of the 45 sites contain open or green spaces, which will perform ecosystem services such as water absorption or temperature regulation.</p> <p>On balance, the policy should have a positive impacts on climate change adaptation, as will not result in significant losses in green infrastructure, and will provide the opportunity for net gains through planting which can support climate change adaptation. In addition, the majority of sites do not have a risk of flooding.</p>	I	P
11. To improve soil quality	0/+	0/+	0/+	<p>Definitive information on whether sites have potential for contamination is not available, and therefore the assessment is based on the current and former</p>	I	P

				<p>uses of the site where known and whether these had potential to result in soil contamination.</p> <p>20 of the sites are considered to have potential for contamination based on current/former uses, or have been investigated as part of a planning application. These sites are therefore considered to have potential for positive impact on this objective as development of the sites for housing would require remediation and improvement in soil quality. The remaining sites which do not have potential for contamination are unlikely to have any impact on this objective.</p> <p>Overall impacts are mixed positive and neutral towards improving soil quality.</p>		
12. To minimise and sustainably manage waste	-	-	-	<p>11 of the 45 sites were considered to offer potential to reduce waste and conserve resources through the ability to make use of and convert the existing buildings on site. 6 of the sites are vacant/cleared sites therefore do not provide this opportunity. The remaining 28 sites are likely to result in complete demolition and re-build and therefore will produce construction and demolition waste, and use additional resources.</p> <p>Overall impacts are considered to be adverse.</p> <p>Mitigation would be provided by WMLP policies.</p>	I	P
13. To make the best use of land available	+	+	+	<p>21 of the 45 sites are currently vacant/derelict sites and therefore development would bring the site back into active use and help to make better use of the site. The remaining 24 sites are in use, however in the majority of cases development would help to maximise land-use efficiency by increasing the dwelling/land-use density on the site, also helping to make the better use of these sites.</p> <p>Almost all sites can achieve minimum dwelling density targets as required by CPP1 and where this is not likely to be achieved, the capacity of a site is considered to be limited by surrounding constraints, or other uses are being provided.</p>	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	<p>The policy allocates 45 sites to deliver a minimum of 1,617 dwellings across the city. This includes some larger sites where more than 15 units would be expected and where 40% affordable housing would be sought in accordance with CPP1 CP20. 30% affordable housing would be sought on the site delivering between 10 and 14 units. In addition, the policy also allocates 9 sites being</p>	D	P

				<p>delivered under the New Homes for Neighbourhood scheme, which delivers 100% affordable rented homes.</p> <p>It is noted that the policy only permits C3 type housing on the allocated sites, however this does include housing where people are living together as a single household and receive care, e.g. older people or people with disabilities, and also includes housing types for older people, such as sheltered housing.</p> <p>The policy is considered to have a significant positive impact on this objective.</p>		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	<p>All of the housing and mixed use sites are considered to be within desirable or acceptable walking distance to at least two of the following essential services such as public transport, local shop, health facility, primary school and children's play-space/park. 30 of these sites were in desirable or acceptable walking distance to all of the above essential services.</p> <p>Overall, impacts are considered to be positive towards this objective.</p>	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>Housing is one of the wider determinants of health and the policy should help to bring forward a significant amount of housing, including affordable housing. The policy could also help to bring forward opportunities for employment, which is also one of the wider determinants of health.</p> <p>As described above, all of sites have good access to various services which has a positive impact on health.</p> <p>33 of the sites were located in areas with either noise and/or air quality issues which could impact upon health and amenity and would require mitigation through design and transport assessments.</p> <p>On balance, impacts on health are considered to be positive.</p> <p>Mitigation with regards to potential air and noise quality issues would be provided by CPP1 CP9 Sustainable Transport policy, emerging CPP2 policy on Transport and Travel and Protection of the Environment &amp; Health.</p>	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>10 of the 45 sites were located within the 10-20% most deprived SOA within the crime domain, meaning that crime is high in these locations. This has implications for design stage where measures to design out crime would be particularly essential.</p> <p>The majority of the sites (30 out of 45 sites) were therefore located within areas where crime deprivation was not within the 10 or 20% most deprived SOA, crime domain.</p>	I	P

				<p>Some of the sites provide opportunities for increasing activity through mixed use developments, supporting community safety and reducing the fear of crime through the renovation or development of vacant and derelict sites, and provide opportunities for community interaction which can help increase passive surveillance and also support community safety.</p> <p>Overall impacts are considered to be positive.</p> <p>Mitigation would be provided by CPP1 CP12 which requires all development to incorporate features which deter crime.</p>		
18. To increase equality and social inclusion	+	+	+	<p>9 of the sites are those which have been identified under the council's New Homes for Neighbourhoods Programmes, which delivers 100% affordable rented housing on council owned land, and could help increase access to housing for people on lower incomes, helping to reduce housing inequalities. 30 out of the remaining 36 sites were larger (15+) and could therefore have potential to deliver 40% affordable housing, which should also help to reduce housing inequalities and particularly supports people on low-mid incomes in the city to access housing and the remaining sites would also be required to deliver 30% affordable housing.</p> <p>Some of the sites have been identified for a particular community, including a site to deliver modular housing for younger people, which helps to meet the needs of this group with protected characteristics; and a site to provide temporary accommodation for people who may be particularly vulnerable. It is noted that the policy only permits C3 type housing on the allocated sites, however this does include housing where people are living together as a single household and receive care, e.g. older people or people with disabilities, and also includes housing types for older people, such as sheltered housing. The policy could therefore help to meet the needs of these people with protected characteristics and would depend on market bringing forward these schemes. Some of the sites were located in areas with a high level of employment and/or education deprivation, and most were located in fairly close proximity to areas of high employment and/or education deprivation and may therefore provide the opportunity to increase skills of locally deprived communities, e.g. through the Local Employment Scheme, although would be dependent on take-up.</p>	I	P
19. To contribute towards the growth	-/+/0	-/+/0	-/+/0	12 of the sites were found to have a positive impact on this objective as the	D	P



<p>of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>				<p>allocation should result in increase in employment floorspace or an improvement in the quality and type of employment floorspace.</p> <p>13 of the 45 sites were found to have potential for adverse impact on this objective as the site allocated was currently in active B use and the housing or mixed use development could result in net loss employment floorspace on these sites.</p> <p>19 of the 45 sites were found to have no impact on this objective as the site allocated will not result in loss or gains in employment floorspace.</p> <p>Overall impacts are considered to be mixed.</p>		
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### Overall Summary

- The policy was found to have potential for significant positive impacts for the housing objective as allocates sites that could deliver more than 1,600 dwellings, including sites which will deliver 100% affordable rented accommodation, and larger sites that should deliver 40% affordable housing.
- The delivery of homes, particular affordable homes has positive impacts for the equalities and social inclusion objective, through helping to reduce housing inequalities. The policy also allocates sites which are likely to deliver housing for certain people with protected characteristics, including young people and people requiring emergency temporary accommodation.
- The policy was found to have positive impacts for making the best use of land through maximising land-use efficiency with higher-density schemes and through the redevelopment of vacant/derelict sites. This also has positive impacts for community safety as can help reduce the fear of crime, in addition the policy will increase opportunities for passive surveillance and community activity through mixed use schemes, which also supports community safety.
- On balance, the policy was found to have positive impacts for reducing the need to travel and access, as most of the sites allocated had good access to public transport and were considered to be within walking distance from some essential services such as schools, shops and health facilities which can influence travel choice.
- On balance, the policy was found to have positive impacts for health, due to proximity to services and the delivery of housing and opportunities for employment both of which are wider determinants of health. However it is recognised that some sites have either air and/or noise issues which could impact upon occupier amenity and health if not considered at the design stage.
- On balance, the policy was also found to have positive impacts for supporting climate change adaptation, as most of the sites are previously developed sites and would not involve a loss of green infrastructure.
- The policy was found to have mixed impacts (neutral/adverse/positive impacts) for the economic development objective. Almost half the sites have a neutral effect as will neither result in a loss or gain in employment floorspace; some of the sites will result in a net gain in employment floorspace or improve the quality of employment floorspace having a positive effect; however some of the sites will result in a net loss in employment floorspace having adverse effects.

- On balance, the policy was found to have mixed impacts (neutral/positive impact) for the biodiversity objective reflecting the fact that most of the sites are previously developed sites with less potential for ecological interest and none of the sites have a nature conservation designation therefore having a neutral effects; development of these sites could result in net gain in biodiversity. It is recognised that some of the sites could have ecological interest due to their natural form, or have TPOs in place on parts of the site which would require mitigation.
- The policy was found to have mixed impacts (neutral impact/positive impact) for the soil quality objective reflecting the fact that more than half the sites are unlikely to be contaminated, therefore having no impact on the objective, whereas some have potential for contamination based on current or former uses, which would require remediation of soil in order to provide housing having a positive effect.
- The policy was found to have mixed impacts (positive/adverse/neutral) for heritage/archaeology, as some sites have heritage/archaeological constraints and could result in adverse impacts which would require mitigation, some do not and would have neutral impacts, and some of the approved schemes have been assessed as having positive impacts for heritage, e.g. through converting and bringing back into use a heritage asset.
- The policy was found to have mixed impacts (positive/negative), as over half the sites have a risk of surface water flooding, and some sites have a risk of groundwater flooding. Only 19 sites (42%) have not flood risk.
- The policy was found to have mixed impacts (positive/negative) for the air quality and noise quality objective, as some of the sites are within the AQMA and could worsen air quality and some of sites suffer from high levels of road/rail noise, which would require mitigation. However some sites do not have air or noise quality issues and are unlikely to worsen air or noise quality having a positive effect.
- The policy was found to have mixed impacts (positive/negative) for reducing greenhouse gas emissions. The potential impact was based on whether sites were located within a heat cluster opportunity area. 29 were located within a cluster area and therefore have greater potential to reduce greenhouse gas emissions when compared with those that are not.
- The policy was found to have an overall adverse effects for the waste objective as more than half the sites will result in completion demolition and redevelopment, will therefore result in production of construction and demolition waste, and will not provide the opportunity to conserve resources.
- The policy was found to have neutral impacts for the open space objective, reflecting the fact that the majority of sites had no open space designation and would therefore not result in any losses in open space having no impact, with only small losses in designated open space taking place in total.
- The policy was found to have neutral impacts for SDNP, as although a few of the sites could be within the setting of the SDNP, the majority are within the central built up areas or situated within an existing urban context, having a neutral effect.
- The policy was found to have neutral impacts for water quality, as although some of the sites are within a groundwater source protection zone, the majority are not, having an overall neutral effect.

**Mitigation of potential adverse impacts and on site considerations would include:**

- Any potential for adverse impacts on biodiversity should be addressed through CPP1 CP10 Biodiversity and also emerging CPP2 policy Green Infrastructure and Nature Conservation which seeks to enhance sites and certain ecological features. Development should result in net gains in biodiversity/green infrastructure, also supporting climate change adaptation.

- Any sites that result in loss of on-site open space must have regard to maintaining some on-site open space in accordance with CP16 Open Space; and all sites must contribute towards providing or improving open space in accordance with the demand it generates.
- All development must be in accordance with CP12 Urban Design and CP13 Public Streets and Spaces, which should raise the quality of design and ensure that development conserves and enhances the historic built environment. In addition, emerging CPP2 policies on heritage assets and archaeology would apply.
- In accordance with emerging CPP2 policy Travel Plans and Transport Assessment, development within the AQMA will be required to submit a Transport Assessment, and all development proposals are required to include measures to minimise use of private car. In addition, this policy requires larger developments to consider cumulative transport impacts. Development must also meet the requirements of emerging CPP2 policy Protection of the Environment & Health by ensuring that they do not give rise to nuisance or pollution that would have an unacceptable impact on health and amenity, such as air and noise pollution and through the requirement to submit air quality impact assessments.
- Any potential for adverse impacts on water quality should be addressed by emerging CPP2 policy Protection of the Water Environment. Development must also meet the requirements of emerging CPP2 policy Protection of the Environment & Health by ensuring that they do not give rise to nuisance or pollution, including to water. In addition CPP1 C8B Sustainable Buildings seeks to safeguard water quality within GSPZs.
- The risk of on-site flooding and increasing flooding elsewhere should be addressed through CPP1 CP11 Flood Risk and emerging CPP2 policy Sustainable Drainage which requires all development to reduce the amount of surface water leaving a site.
- The requirement for development to reduce carbon emissions would be provided through CPP1 policy CP8 Sustainable Buildings which requires certain standards to be achieved by new build developments, and also through emerging CPP2 policy on Energy Efficiency & Renewables for conversions.
- All developments would need to address construction stage waste management, including demolition waste in accordance with the Waste & Minerals Local Plan.
- All development will be required to incorporate features which deter crime in accordance with CPP1 CP12 Public Streets and Spaces.

## Policy H1: BUA Housing Allocations

### Housing-sites only

Site / SA Objective	Bio-div	Open space	SDNP	Herit age	Transp.	Air noise	Water qual.	Flood risk	CC mit.	CC adapt	Soil qual.	Waste	Use land	House	Access	Health	Comm. Safe	Eq. & inc.	Ec Dev	Overall
Former St Aubyn's School, Rottingdean,	--	-	0	--	++	-	++	-	-	-	+	+	+	++	+	+	+	+	0	Mixed
Land between Marina Drive and rear of 2-18 The Cliff, Brighton	-	--	-	-	-/+	-/+	++	+	+	-	0	0	+	++	+	+	+	++	0	Mixed
25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton	++	0	0	--	++	-/+	++	-	-	++	?	-	+	++	++	+	++	++	-/+	Mixed
46-54 Old London Road, Patcham	-	0	0	0	-/+	-/+	--	--	-	-	0	--	+	++	+	+	+	++	0	Mixed
60-62 & 65 Gladstone Place, Brighton	+	0	0	--	++	-/+	++	--	-	++	+?	-	+	+	+	+	++	+	-/+	Mixed
76-79 & 80 Buckingham Road, Brighton	++	+	0	++	++	+	++	++	+	+	0	+	++	++	++	++	++	++	0	Pos
87 Preston Road, Brighton,	0	+	0	++	++	--	++	--	-	++	0	+	++	++	++	+	++	++	0	Pos
251-253 Preston Road, Brighton,	-	+	0	++	++	-/+	++	--	+	+	0	+	++	++	+	+	++	++	0	Pos
Eastergate Road Garages, Moulsecoomb	++	0	0	0	-/+	++	--	++	--	+	+	--	++	++	+	+	-	++	0	Mixed
Land between Manchester Street/Charles Street, Brighton	++	0	0	--	++	--	++	++	-	+	?	0	++	++	++	+	-	+	++?	Mixed
Baptist Tabernacle, Montpelier Place,	++	0	0	++	++	++	++	++	+	++	0	--	++	++	++	++	++	+	0	Pos
Preston Park Hotel, 216 Preston Road,	0	0	0	++	++	-/+	++	--	+	+	0	+	+	++	+	+	++	++	0	Pos
George Cooper House, 20-22 Oxford Street, Brighton	++	0	0	++	++	--	++	--	+	+	0	++	++	+	++	+	--	++	-	Pos
Old Ship Hotel, (garage), Brighton	0	0	0	-	++	--	++	++	+	0	0	--	++	++	++	+	--	++	0	Mixed
Saunders Glassworks, Sussex Place	0	0	0	++	++	-/+	++	--	++	+	+	--	++	++	++	+	+	++	0	Pos
Selsfield Drive Housing Office, Selsfield Drive, Brighton	++	0	0	-	++	-/+	--	-	+	+	0	--	+	++	++	+	--	++	-	Mixed
Tyre Co, 2-16 Coombe Road, Brighton	++	0	0	0	++	--	--	--	+	+	?	+	+	++	++	+	++	++	--	Mixed
Whitehawk Clinic, Whitehawk Road,	++	++	0	0	++	++	++	++	++	++	0	--	++	++	++	++	+	++	0	Pos
Buckley Close garages, Hangleton	++	0	0	-	+	-/+	-	++	--	+	0	--	++	+	+	+	++	+	0	Mixed
Former playground, Swanborough Drive, Whitehawk	+	--	0	0	-/+	++	++	++	-	+	0	0	++	++	+	+	--	++	0	Mixed
Former Hollingbury Library	++	--	0	0	+	++	++	++	-	+	0	--	++	+	++	++	++	++	0	Pos
29-31 New Church Road, Hove	-	-	0	--	++	++	++	++	-	-	0	--	+	++	++	++	++	++	0	Mixed
189 Kingsway, Hove	+	0	0	--	+	-	++	-	+	+	0	0	++	++	+	+	+	+	0	Pos
Kings House, Grand Avenue, Hove	++	0	0	--	++	--	++	--	-	+	0	++	++	++	++	+	++	++	--	Mixed
Land at and surrounding Downsman Pub, Hangleton Way, Hove	-/+	++	0	-/+	+	-/+	-/+	-	+	+	+	--	++	++	+	+	++	+	0	Mixed
Victoria Road Former Housing Office (adjacent Portslade Town Hall)	++	-/0	0	-	++	+	++	--	+	-	0	--	+	++	++	++	+	++	--	Mixed
Land at the corner of Fox Way and Foredown Road, Mile Oak	-	-	-	0	-	++	++	-	-	--	0	0	+	+	+	+	++	+	0	Mixed
Smokey Industrial Estate, Corner of Church Road, Lincoln Road & Gladstone Road Portslade	++	0	0	0	++	--	++	-	+	+	+	--	++	++	++	+	+	++	--	Pos
Land south of Lincoln Street Cottages, 15-26 Lincoln Street, Brighton	++	0	0	0	++	++	++	++	-	+	+	--	++	++	++	++	++	++	--	Pos
Belgrave Centre and ICES, Portslade (SP2)	++	0	0	0	++	--	++	-	++	+	0	--	++	++	++	+	+	++	-	Pos

Wellington House, Portslade (SP3)	++	0	0	0	++	--	++	++	+	+	0	--	++	++	++	+	+	++	--	Pos
<b>Overall Summary: predominantly...</b>	<b>0/+</b>	<b>0</b>	<b>0</b>	<b>-/+0</b>	<b>+</b>	<b>-/+</b>	<b>+</b>	<b>-/+</b>	<b>-/+</b>	<b>+</b>	<b>0/+</b>	<b>-</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>0/-</b>	

## Mixed-use sites

Site / SA Objective	Bio-div	Open space	SDNP	Heritage	Transp	Air noise	Water qual	Flood risk	CC mit	CC adapt	Soil qual	Waste	Use land	House	Access	Health	Comm Safe	Eq & inc.	Ec Dev	Sum
City College, Pelham Tower (and car-park), Pelham Street	++	0	0	--	++	--	++	--	++	+	+	-	+	++	++	+	-	++	-	Mixed
71 - 76 Church Street, Brighton	++	0	0	--	++	--/+	++	++	+	+	0	+	+	++	++	+	-	++	++	Pos
The Astoria, 10-14 Gloucester Place	++	0	0	++	++	--	++	--	++	++	0	--	++	++	++	+	+	++	++	Pos
Post Office site, 62 North Road, Brighton	++	0	0	--	++	-/+	++	--	+	+	0	--	++	++	++	+	-	++	++	Mixed
Former Brewery site, South Street, Portslade	++	0	0	++	++	++	++	--	++	++	?	++	++	++	++	++	++	++	--	Pos
27-31 Church Street, Brighton	++	0	0	++	++	--/+	++	++	++	++	+	0	+	+	++	+	-	+	++	Pos
Former Dairy Crest Site, 35-39 The Droveaway, Hove	++	0	0	-	+	++	--	-	-	+	0	++	+	+	+	+	++	+	+	Pos
270 Old Shoreham Road, Hove	++	0	0	-	++	-/+	--	++	-	+	+	--	+	+	+	+	++	+	++	Mixed
Kingsway/Basin Road North (AB4)	++	+	0	0	+	--	++	--	++	+	+	-/+	+	++	+	+	++	++	++	Pos
Prestwich House, Portslade (SP1)	++	0	0	0	++	--/+	++	++	++	+	+	--	+	++	++	+	+	++	++	Pos
Regency House, Portslade (SP4)	++	0	0	0	++	--/+	++	-	++	+	+	--	+	++	++	++	+	++	+	Pos
Former Flexer Sacks, Portslade (SP5)	++	0	0	0	++	--	++	++	++	+	+	--	+	++	++	+	+	++	+	Pos
Church Road/Wellington Road/ St Peter's Road, Portslade (CA3)	++	0	0	0	++	--	++	-	++	+	+	--	+	++	++	+	+	++	++	Pos
Station Road, Portslade (SP7)	++	0	0	0	++	--/+	++	++	++	+	+	--	+	++	++	++	+	++	++	Pos
<b>Overall Summary: predominantly</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>-/+0</b>	<b>+</b>	<b>-/+</b>	<b>+</b>	<b>-/+</b>	<b>+</b>	<b>+</b>	<b>0/+</b>	<b>-</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	

The majority of sites are considered to have mixed or generally more positive effects overall. Where adverse effects have been identified, these should be able to be overcome by on-site mitigation. None of the adverse effects identified at this site assessment stage are considered to be of the type that are insurmountable or that cannot be mitigated appropriately, and therefore the SA does not recommend removing any of the sites.

## H2 Urban Fringe Sites Options Stage

There are two sets of options that are of relevance to this policy: 1) Housing Allocations and 2) Urban Fringe Site Allocations.

### Housing allocations

- Option 1: Do not allocate any sites for housing. Rely on market to bring forward suitable sites.
- Option 2: Allocate all sites in SHLAA that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.
- Option 3: Allocate sites in the SHLAA capable of delivering 10+ units, that do not have planning permission and those that have planning permission but have not commenced, that are deliverable within the plan period.

### Urban Fringe Site Allocations

- Option 1) No detailed policy framework and site allocations to guide new and appropriate development on the city's Urban Fringe sites (rely on market to bring forward)
- Option 2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations
- Option 3) Bespoke criteria-based policies for each urban fringe site allocated

**This policy is considered to be linked to Option 3 of the Housing Allocations options and Option 2 of the Urban Fringe Site Allocations options with 14 sites/clusters allocated, all of which can deliver more than 10 dwellings and which are considered to be deliverable during the plan period.**

### **Assumptions**

- This assessment is based on a combination of the individual sites assessments undertaken for each site, as well as the policy requirements within H2 and is explained further in the commentary.
- Assumed that sites which have a extant planning consent will be built in accordance with that consent and other sites assessed pre-mitigation
- This assessment does not consider the requirements of CPP1 SA4, although this is referred to in mitigation where relevant
- This policy does not assess some of the indirect impacts associated with housing delivery, for instance, population growth, increased transport movements and increased resource use, as these wider impacts have been assessed under CPP1 CP1 Housing Delivery.

**This assessment is based on a summary of the individual site assessments for each of the 14 site allocations, which can be found at the end of this appraisal.**

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-/+	-/+	0/+	<p>6 of the site allocations contain local nature conservation designations; 3 sites without designations are still greenfield in nature and therefore could have potential for some ecological interest even if not designated as such; 5 sites are PDL and have little ecological interest. Some sites include rare or protected species or habitats. UFA2015 concluded that ecological impacts could be mitigated across all sites where relevant and that development on some sites could provide opportunities for nature conservation enhancement.</p> <p>9 of the 14 sites allocated include ecology as a key site consideration within the policy table. This highlights the needs for ecological issues to be addressed on these site, e.g. through various ecological mitigation. The supporting text refers to the sensitivity of some urban fringe sites and refers to the need for planning applicants to provide an ecological assessment.</p> <p>Overall impacts are considered to be mixed adverse/positive in the short and medium term, reflecting that development on some sites is likely to result in adverse impacts initially, whereas development on other sites (e.g. PDL sites) could offer potential for nature conservation enhancement. In the longer term, impacts are considered to be more neutral and positive, on the assumption that measures to mitigate against adverse impacts are implemented and are effective.</p> <p>Mitigation would also be provided by CPP1 CP10 Biodiversity, as well as emerging CPP2 policy Green Infrastructure and Nature Conservation. Policy amended following SA recommendation to include a reference to incorporating green infrastructure, which could also impact upon biodiversity.</p>	D	T/P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	-/+	-/+	<p>5 of the site allocations contain publically accessible areas of designated open space; 3 of the site allocations are privately owned areas of designated open space with or without access; 6 of the sites do not have any open space designations and include brownfield sites or those in a countryside location. The policy includes a specific criteria which requires all schemes to secure new or</p>	D	P



				<p>improved publically accessible open space. On privately owned sites, this will result in a net increase in accessible open space however development on publically accessible sites is still likely to result in an overall net loss, although this could be mitigated through improvements elsewhere.</p> <p>The policy requires food growing opportunities to be incorporated into schemes, with will increase green infrastructure as well as having health benefits. The policy also requires schemes to improve links and access to the SDNP which will support achieving this objective.</p> <p>9 of the 14 sites allocated include open space as a key on-site consideration within the policy, which should ensure that open space issues are addressed. The supporting text refers to the sensitivity of some urban fringe sites and refers to the need for planning applicants to provide an open space assessment.</p> <p>Overall, impacts are considered to be mixed, with the positive impacts reflecting the aspirations and specific requirements of the policy in relation to open space, and the adverse impacts reflecting the risk there will still be an overall net loss of publically accessible open space.</p> <p>Following SA recommendation, the policy also now requires development to incorporate green infrastructure, which also supports this objective.</p>		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/0	-/0	0/+	<p>All of the sites are located adjacent or in close proximity to the SDNP. Some of the sites have a similar landscape character to the SDNP and some are visually prominent therefore development could adversely affect the SDNP setting; whereas some sites currently detract from the character of the SDNP and development could therefore provide an opportunity to improve the landscape. UFA2015 concluded that landscape impacts could be mitigated on most sites where relevant.</p> <p>The policy includes a specific criteria which requires all schemes to improve links and access to the SDNP and surrounding area where feasible. In addition, all 14 site allocations include landscape as a key on-site consideration within the</p>	D	T/P

				<p>policy, which should ensure that landscape issues are addressed, e.g. through mitigation. The supporting text refers to the sensitivity of some urban fringe sites and refers to the need for planning applicants to provide a LVIA as well as a lighting assessment, which should support the SDNP as a dark sky reserve.</p> <p>Overall impacts are considered to be mixed adverse/neutral in the short and medium term, reflecting that development on some sites is likely to result in adverse impacts initially whilst mitigation measures are not established (e.g. buffers/screening). In the longer term, impacts are considered to become more neutral and positive, on the assumption that measures to mitigate against adverse impacts are implemented and are effective, and on the assumption that links to the SDNP are improved.</p> <p>Mitigation would be provided by CPP1 SA5 SDNP and SA4 Urban Fringe policy which requires the protection and enhancement of the landscape role of the urban fringe.</p>		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-/0	-/0	-/0	<p>3 of the site allocations are either adjacent to or within the setting of a designated heritage asset; 9 of the sites contain an Archaeological Notification Area. 5 sites do not have any heritage constraints. UFA 2015 concluded that heritage/archaeological impacts would not pose an insurmountable constraint to development and that a programme of archaeological works would be required at various sites to fully evaluate potential.</p> <p>Following SA recommendation, 9 of the 14 sites allocated include heritage and/or archaeology as a key on-site consideration within the policy, which should ensure that heritage and archaeology issues are addressed, e.g. through mitigation. The supporting text refers to the sensitivity of some urban fringe sites and refers to the need for planning applicants to provide a heritage statement and archaeological assessment.</p> <p>Overall impacts are considered to be mixed adverse/neutral, with adverse impacts based on need to excavate any archaeological artefacts and neutral effects where there are no considered to be any impacts.</p> <p>Mitigation would be provided by CPP1 CP15 Heritage and emerging CPP2 policies</p>	D	P

				on heritage and archaeology.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	-	-	<p>Some of the sites have good access to regular public transport and various services, however some do not. All are located on the outer fringes of the city which may influence car ownership and method of travel and may result in an increase in transport movements in that location.</p> <p>The supporting text refers to the sensitivity of some urban fringe sites and refers to the need for planning applicants to provide a traffic assessment.</p> <p>Overall impacts are considered to be adverse.</p> <p>Mitigation would be provided by CPP1 CP9 Sustainable Transport policy and emerging CPP2 policy on Transport and Travel.</p>	I	P
6. To improve air and noise quality	-/+	-/+	-/+	<p>None of the sites are situated within or adjacent to the AQMA. 10 sites are considered unlikely to generate a significant amount of traffic individually and are unlikely to affect air quality, however 4 sites may generate traffic that could impact upon air quality due to volume of traffic that a large development (&gt;100 dwellings) could generate.</p> <p>9 sites do not suffer from any road related traffic noise issues; 5 sites do suffer from road noise which could impact upon occupier amenity.</p> <p>The policy table does not include air quality or noise as a specific site consideration, however the supporting text refers to the need for applicants to submit a traffic, noise and air quality assessments.</p> <p>Overall impacts are considered to be mixed with the positive score reflecting the lack of noise or air quality issues on some sites, and the adverse score reflecting the opposite and the risk that some sites could generate air quality issues.</p> <p>Mitigation would be provided by CPP1 CP9 Sustainable Transport policy, emerging CPP2 policy on Transport and Travel and Protection of the Environment &amp; Health.</p>	I	T
7. To improve water quality (ecological, chemical and quantity status)	-/0	-/0	-/0	<p>8 of the sites are within a GSPZ; 6 of the sites are not within a GSPZ.</p> <p>Development could impact upon water quality where located within the GSPZ.</p> <p>Following SA recommendation, 8 of the 14 sites allocated include "aquifer" as a key on site consideration within the policy, which should ensure that impacts are addressed resulting in neutral impacts.</p> <p>Overall impacts are mixed.</p> <p>Mitigation should also be provided by CPP1 SA4 Urban Fringe policy which</p>	D	T

				requires protection of GSPZ and emerging CPP2 policy Protection of the Water Environment.		
8. To reduce the risk from all sources of flooding to and from development	-/0	-/0	-/0	<p>All of the sites are within floodzone 1 and therefore have no risk of tidal flooding. 6 of the sites have a risk of either groundwater and/or surface water flooding at varying extents. 8 of the sites have no flood risk.</p> <p>Following SA recommendations, 10 of the 14 sites allocated include floodrisk as a key on site consideration within the policy table, which should ensure that impacts are addressed. The supporting text also refers to the need to submit a flood risk assessment, due to the sensitivity on some sites.</p> <p>Overall impacts are mixed.</p> <p>Mitigation should also be provided by CPP1 CP8 Sustainable Buildings, CP11 Flood Risk and emerging CPP2 policy on SUDs.</p>	D	T
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	<p>None of the sites are within or adjacent to a heat network cluster opportunity areas and therefore would not provide the opportunity to reduce greenhouse gas emission/improve energy efficiency in this way.</p> <p>However, the policy includes a specific criteria which requires development to consider renewable energy provision. This should have positive impacts on this objective.</p>	D	P
10. To increase the city's resilience and ability to adapt to climate change	-	-	-	<p>10 of the 14 sites include areas of land in a natural form, e.g. open/green space. From the sites allocated, it's anticipated that approximately 18% of the total site area will be developed (27ha of 147ha). Although this leaves a significant amount of land in a natural form, development of these sites will still result in the urbanisation of land from this natural state, and reduces their ability to provide natural functions, such as water absorption and temperature regulation which will become increasingly important due to anticipated climate change impacts.</p> <p>It is recognised that the policy requires development to secure additional or improved open space (although this could be hard surfaced) as well as provide opportunities for food growing, which contributes towards mitigating this impact.</p> <p>Following SA recommendation on an early draft, the policy was amended to include a requirement for development to incorporate green infrastructure. Although this improves the policy in relation to adaptation to climate change, it</p>	I	P

				is likely that overall there will still be a net loss of green infrastructure, and therefore the impacts are still considered to be negative. Mitigation also provided by CPP1 CP10 biodiversity and emerging CPP2 Green Infrastructure & Nature Conservation.		
11. To improve soil quality	-/+/0	-/+/0	-/+/0	3 of the sites are classified as being within Grade 3 agricultural land, and therefore development on these sites would result in total loss of this type of soil quality and result in adverse impacts. Most of the sites are considered to have low potential for contamination, based on current/former uses and therefore would have a neutral impact on this objective. 1 site may have potential for contamination based on current agricultural uses, and therefore offers the potential to result in an improvement in soil quality. The supporting text refers to the need to provide a land contamination survey which should address this issue.	I	P
12. To minimise and sustainably manage waste	-/0	-/0	-/0	Most of the sites do not contain buildings which could be renovated or reused, and therefore do not provide opportunities to reduce waste. The sites that do contain buildings are unlikely to retain or re-use these buildings and would therefore result in production of demolition waste. Mitigation would be provided by WMLP policies.	I	P
13. To make the best use of land available	+	+	+	Only 1 of the sites is recommended to be developed in its entirety (site 46a). All of the other sites suggest developing a portion of the site, with the site allocations covering 18% of the total site area (26ha of 147ha) of the urban fringe sites within the policy. The majority of the sites are likely to result in low density dwellings and are unlikely to achieve CPP1 minimum density targets, however this reflects the need to consider other site constraints and minimise risk of adverse impacts. Overall impacts are considered to be positive, as overall will provide housing whilst still enabling the retention of greenfield functions where relevant.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy suggests that over 850 dwellings could be delivered across the urban fringe allocations. This will make a significant contribution towards local housing need and will include affordable housing. The policy text also makes the specific requirement to deliver 50% family housing (3+ bedroomed) on all but 2 of the sites, helping to meet this housing need. The policy also supports self/custom	D	P

				build. Overall impacts should be significantly positive.		
15. To improve the range, quality and accessibility of services and facilities.	-/+	-/+	-/+	5 of the site allocations are considered to be within walking distance from certain services and facilities, such as local shop, schools and health, however the remaining 9 sites are not. Overall impacts are therefore mixed. The policy includes a specific criteria which requires development to consider the need for community facilities which helps to mitigate against this impacts, in addition to emerging CPP2 policy on Community Facilities.	D	P
16. To improve health and well-being, and reduce inequalities in health	-/+	-/+	-/+	As outlined under objective 15, some of the sites do not have good access to services and facilities, which can impact upon health. As outlined under objective 2, development on some of the sites could result in a net loss in open space, which could impact upon the ability to undertake physical activity. As outlined under objective 6, some of the sites suffer from high noise levels, which can impact upon health, and some of the sites may result in an increase in air pollutants, which can also impact upon health. However, the policy will result in a significant amount of housing, which is one of the wider determinants of health, may result in increased access to publically open space in some areas, and improve links to the SDNP, supporting recreation and physical activity, and many sites do not have or are unlikely to result in any noise or air quality issues. Overall impacts are mixed.	I	T/P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The majority of the sites are not located within an area of high crime deprivation. Sites which are in areas with higher crime deprivation would need to ensure developments include measures to design out crime. Development on the some sites could provide opportunities to increase passive surveillance and increase activity in areas where there is currently little or no activity, which would support community safety.	I	P
18. To increase equality and social inclusion	+	+	+	All sites would provide 10 or more dwellings and would therefore provide on-site affordable housing, which would support people on lower incomes to access housing. Some of the sites are located in close proximity to areas of employment/skills deprivation and may provide opportunity to increase skills, although this would	I	P

				depend on take-up and is not specifically referred to in the policy. In addition, the policy requirement to for consideration of incorporating renewable energy technologies, could result in improved energy efficiency, and can contribute towards addressing the risk of fuel poverty.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	0	0	0	The majority of the sites are in open space uses and do not contribute towards the local economy, however four of the sites have businesses on site (1 farm, 2 horse-stables/livery, 1 ex-farm). Redevelopment on these sites could result in loss of these businesses, although some could potentially relocate elsewhere. Overall, the policy is found to have no impacts on this objective, as would not result in an increase in employment floorspace, would not result in a loss of B employment floorspace, and any losses in economic activity is considered to be off-set by the benefits that house-building brings to the local economy.		

### Overall Summary

- The policy was found to have potential for significant positive impacts for housing as should result in more than 850 dwellings, including a proportion of affordable housing and family (3+ bedroomed) dwellings.
- The policy was found to have potential for positive impacts for the objectives for reducing greenhouse gas emissions, through the requirement for development to consider incorporating renewable energy technologies; making the best use of land as will help to deliver housing and make good use of the sites whilst retaining greenfield functions across non-developed parts of the sites; community safety, through the potential to increase activity and passive surveillance; and equalities, through the delivery of affordable housing, and also through the potential to address the risks of fuel poverty.
- The policy was found to have potential for adverse impacts for transport/travel, as some of the sites had poor access to public transport and other services and their location on the fringes of the city may influence car ownership and travel choice. Although the policy was amended following initial SA on an earlier draft to incorporate a requirement to incorporate green infrastructure, the policy is still considered to have potential for adverse impacts for climate change adaptation as development will result in partial loss of sites that provide natural functions, such as temperature regulation and water absorption, which will become increasingly important with climate changes.
- The policy was found to have mixed impacts (positive/adverse) for access and health, as some sites have poor access to services and facilities, although some have good access; some sites suffer from high road noise, whereas others do not; some sites may worsen local air quality, whereas others are unlikely to; and development will result in delivery of housing which is a wider determinant of health however may result in loss of space to carry out physical activity having different health impacts.
- The policy was found to have mixed impacts (positive/adverse) for biodiversity, as some sites contain nature conservation designations and ecological interest and could result in losses, whereas others do not and offer potential for nature conservation enhancement.

- The policy was found to have mixed impacts (positive/adverse) for open space, as some sites contain publically accessible open space and would result in a net loss, whereas others are privately owned and may result in a net gain in accessible open space through the policy requirements to secure additional or improvements to open space.
- The policy was found to have mixed impacts (adverse/neutral) for SDNP, as all sites are within the setting of the SDNP and have landscape sensitivities, becoming more neutral in the longer term as mitigation measures become more effective.
- The policy was found to have mixed impacts (adverse/neutral) for heritage/archaeology, as some sites have heritage/archaeological constraints and could result in adverse impacts, whereas some do not and would have neutral impacts.
- The policy was found to have mixed impacts (adverse/positive) for air/noise quality, as although none of the sites are within the AQMA reducing the risk of a worsening of air quality where it is particularly poor, some of the sites delivering more than 100 dwellings could worsen localised air quality; and some of sites suffer from high levels of road noise which could impact upon occupier amenity, although some do not.
- The policy was found to have mixed impacts (adverse/neutral) for water quality, as some of the sites are within a groundwater source protection zone and could impact upon water quality, whereas some are not, having a neutral effect.
- The policy was found to have mixed impacts (adverse/neutral) for flood risk, as some of the sites have a risk of flooding, whereas some do not, having a neutral effect.
- The policy was found to have mixed impacts (adverse, neutral, positive) for soil quality, as some of sites are classified as grade 3 agricultural land and would result in loss of this resource, most are considered to have low potential for contaminated land having neutral impacts, and some are considered to have potential for contamination and would provide the opportunity to improve soil quality.
- The policy was found to have neutral impacts for economic development, as will not result in any gains of employment land and the potential impacts of loss of some businesses are considered to be outweighed by the economic benefits of housebuilding.

## Recommendations

Following SA on an earlier draft the following key site considerations were added to the table:

- Archaeology: site 50
- Surface water flood risk: site 50
- Aquifer: sites 17, 42, 46a, 48 cluster and 50

Policy point c) was also amended as follows, which helps to support climate change adaptation as well as contributes to achieving biodiversity objectives:

- c. Green infrastructure and local food growing opportunities are incorporated within the proposed scheme



## Mitigation

The following CPP1 and emerging CPP2 policies would provide mitigation for the various impacts:

- CPP1 CP10 Biodiversity, as well as emerging CPP2 policy Green Infrastructure and Nature Conservation.
- CPP1 SA5 SDNP and SA4 Urban Fringe policy which requires the protection and enhancement of the landscape role of the urban fringe.
- CPP1 CP15 Heritage and emerging CPP2 policies on heritage and archaeology.
- CPP1 CP9 Sustainable Transport policy and emerging CPP2 policy on Transport and Travel and Protection of the Environment & Health.
- CPP1 SA4 Urban Fringe policy which requires protection of GSPZ and emerging CPP2 policy Protection of the Water Environment.
- CPP1 CP8 Sustainable Buildings, CP11 Flood Risk and emerging CPP2 policy on SUDs.
- Waste & Minerals Local Plan policies that support management of demolition and construction waste
- Emerging CPP2 policy on Community Facilities.

**Policy H2: Urban Fringe Housing Allocations**

SA Objective / UF site number	1 & 2	4-6	11-12	16	17	21-21a	30	32-32a	33	38-39	42	46a	48-48c	50	Overall
1. Biodiversity	-	+ 0	-	-	-	-	-	+	?		0/-	+	+	+	Mixed
2. Open space	--	++ 0	--	--	--	-	--	0	--	0	-	0	++	++	Mixed
3.SDNP	-	0 0	--	-	-	-	-	-	-	-	0/-	+	+	+	Largely adverse
4. Historic built environment	0	- -	--	--	--	--	--	-	0	--	0	0	0	-	Largely adverse
5. Transport	-	-	--	+	+	-	-/+	--	--	--	--	--	--	-	Largely adverse
6. Air and noise pollution	++	--	--	-/+	-/+	--	--/+	++	++	+	+	++	++	++	Mixed
7. Water quality	++	--	++	--	-	--	++	++	++	++	-	--	-	-	Mixed
8. Flood risk	+	-	+	-	+	+	+	+	+	-	-	-	-	+	Mixed
9. Greenhouse gas emissions	-	-	-	-	-	-	+?	-	-	-	-	-	-	+	Largely adverse
10. Climate change adaptation	-	-	-	-	-	-	-	-	-	++	-	-	+	-	Largely adverse
11. Soil quality	0	0	0	0	0	0	0	0	0	--/+	--/0	--/0	+	0	Largely neutral
12. Waste	0	0	0	0	0	0	0	-	-	--	0	0	--	-	Largely neutral
13. Best use of land	+	+	+	+	+	+	++	+	+	+	+	-	+	+	Positive
14. Housing	++	++	++	++	++	++	++	+	++	++	++	++	++	++	Positive
15. Accessibility	+	++	-	+	++	+	-	-	-	-	-	--	--	-	Mixed
16. Health	+	++	-	+	+	+	-	-	-	-	-	-	-	-	Mixed
17. Community safety	++	++	+	++	++	++	--	-	++	++	++	++	++	++	Largely positive
18. Equalities & inclusion	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
19. Economic dev.	0	0	0	0	0	0	0	-	-	-	0	0	-	0	Largely neutral
<b>Overall Summary and Policy Considerations</b>	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	

### H3 Purpose Built Student Accommodation sites

#### Options Stage

Option 1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA

Option 2) Criteria based policy with no preferred sites identified

Option 3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.

**This policy is reflective of option 3, with two sites identified as allocation**

#### Assumptions

- The policy will not repeat anything of a strategic nature that is already included in CPP1 and CPP1 policy requirements will be implemented, particularly those relating to CP21 Student Accommodation, as well as emerging policy CPP2 on PBSA
- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts, however assumes generic impacts arising from development would be addressed.

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There are no additional policy requirements relating to biodiversity within the policy. There are no sites of nature conservation importance on or adjacent to the sites and development is unlikely to have any effect on those nearest to the site as they are located some distance away. The sites are both entirely PDL and are not considered to have much potential for biodiversity. Therefore there are no direct impacts on this objective by the policy itself. Net gains in biodiversity could be achieved on site through implemented of CPP1 CP10.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	0	There are no additional policy requirements relating to open space within the policy. There are no open spaces on the sites currently and therefore development of the sites will not result in any losses of open space, however it is considered unlikely that the development of sites will result in any increases in open space, due to the nature of the sites both being above existing developments.		

				There are no direct impacts on this objective by the policy itself.		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There are no additional policy requirements relating to landscape within the policy. The sites are both within an existing urban area and separated from the SDNP by existing development. There are no direct impacts on this objective by the policy itself.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-	-	-	There are no additional policy requirements relating to heritage assets or townscape. One of the sites does not contain any heritage assets and is not adjacent or in close proximity to any. The other site may have some heritage constraints due to proximity to Conservation Area and Listed Building. Therefore impacts could be adverse. Mitigation: CP21 permits high density development in locations where they are compatible with the existing townscape. Other heritage policies would apply.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	The policy does not have any additional requirements relating to this objective. However the sites are located on sustainable transport corridors and both have good existing access to public transport which can help promote sustainable travel choice. Development of the sites should therefore have positive impacts on this objective due to the location. Emerging policy on PBSA also requires development to include measures to promote sustainable transport use, including management arrangements to prevent students from keeping cars, which will also impact positively on this objective.	I	P
6. To improve air and noise quality	+	+	+	The policy itself does not have any additional requirements relating to air or noise quality. Although it is recognised that both sites are within the AQMA, the sites' locations on a sustainable transport corridor, as well as other policy requirements relating to sustainable transport and vehicle management should ensure that the number of average daily vehicle movements resulting from the development is not over the amount above which air quality would be effected (100 per day). The policy and site allocations are therefore considered to have positive impacts for air quality. The sites both suffers from high levels of road noise, which can effect occupier amenity, and could itself be a generator of noise. The supporting text does require development to be designed to minimise any negative effects on surrounding residential areas, which is also repeated in the emerging policy on PBSA. Overall impacts are considered to be positive.	I	T/P

7. To improve water quality (ecological, chemical and quantity status)	-	-	-	<p>The policy itself has no requirements relating to water consumption or water quality. One of the sites (Lewes Road) is within GSPZ1 and therefore development in this location could present a risk of pollution to groundwater resources e.g. through dispersal of pollutants. There could be a risk with regards to the bus garage site as the site could have potential for contamination. Impacts considered to be negative.</p> <p>Mitigation: CPP1 CP8 sets the standards relating to water quality and consumption for both new build residential and non-residential development which would be applied and also requires development to safeguard water supplies if within a GSPZ.</p>	I	T/P
8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>The policy itself has no requirements relating to flood risk. Both sites have a risk of surface water flooding and therefore development in this location could be at risk of flooding. Both sites also have groundwater levels between 0.5m and 5m which could mean the sites are at risk of groundwater emergence. However, the entire site is PDL and of a completely urbanised form and development on the site will therefore not result in an increased in urbanised environment and is unlikely to increase the risk of flooding.</p> <p>Mitigation: CPP1 CP8 requires development to reduce surface water flood risk and emerging CPP2 policy on SUDS requires development to incorporate SUDS to ensure there is a reduction in surface water leaving the site.</p>	I	T
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	<p>The policy itself has no requirement relating to reducing greenhouse gas emissions. One of the sites is not within a Heat Network Cluster Opportunity Area, although is in fairly close proximity, the other is within an Opportunity Area. The requirements of CPP1 CP8 relating to energy efficiency would apply. In addition, delivery of student accommodation may provide opportunities to support energy efficiency, e.g. through communal heating systems. Impacts are therefore positive representing the opportunity this type of development presents.</p>	I	P
10. To increase the city's resilience and ability to adapt to climate change	0	0	0	<p>The policy itself has no requirements relating to measures which may support climate change adaptation. Both sites have a risk of surface water flooding, which could worsen with climate change, however as a PDL site of an entirely</p>		

				urbanised form, it is considered unlikely that development itself will increase the risk of climate change impacts. Therefore there are no direct impacts on this objective by the policy itself. CPP1 CP8, CPP1 CP10 and emerging policy on SUDS should result in measures which support climate change mitigation, such as green infrastructure and flood prevention.		
11. To improve soil quality	0	0	0	One of the sites may have potential for contamination based on current uses, however this is unknown at this stage. Any contaminated land would require remediation in accordance with other CPP1 policy. The policy itself does not include any additional specific policy requirements relating to land contamination and remediation. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
12. To minimise and sustainably manage waste	0	0	0	Redevelopment of the sites would not present the opportunity to convert any of the existing buildings and therefore will result in production of waste. Requirements relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan, and therefore the policy itself does not include any additional specific policy requirements relating to waste reduction. Overall the policy itself is considered unlikely to have any additional impacts on this objective.		
13. To make the best use of land available	+	+	+	The policy indicates that if PBSA is delivered on Lewes Road site, it is likely to be in the form of a development above a reconstructed bus depot shed, or on redundant land within the site. The London Road site specifies that requirements of emerging retail policy would need to be met, which should mean that retail is retained at ground floor level. A development over a bus depot shed, or over retail units would help to make the best use of land in the city, as would not involve any additional land take, having positive impacts. Alternatively, if delivered on redundant land within the Lewes Road site, this would also presumably make good use of land available, if otherwise redundant.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The allocations would provide accommodation for 400 students, making a significant contribution to student housing needs. The policy would also indirectly have a positive impact on the local housing market, as may reduce the need to provide accommodation for students in HMOs, and could potentially result in some HMOs being converted back into C3 housing.	I/D	P

15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy would not result in delivery of any services or facilities as such. The policy has no additional requirements relating to improving access. However the site is accessibly located in close proximity to public transport, and existing services such as healthcare and shops. Overall the policy itself is considered to have positive impacts on this objective.	I	P
16. To improve health and well-being, and reduce inequalities in health	-/+	-/+	-/+	The policy itself has no additional policy requirements relating to health. The sites both suffer from high levels of road noise, which could impact upon occupier's health. The sites are both within the AQMA. The sites' locations along sustainable transport corridors, including cycle paths, could facilitate active travel, which would have health benefits. Both sites have good access to various services, which promotes health access. In addition, emerging policy on PBSA requires bedrooms and communal space to be of a sufficient size, as well as to have adequate access to daylight, which should ensure accommodation is of a good standard, having health benefits. Overall, impacts are mixed. Mitigation for noise would be addressed through emerging CPP2 policy on Protection of the Environment, Pollution and Nuisance which should both protect occupier amenity, as well as prevent against any noise nuisance arising from the development.	I	P
17. To improve community safety, and reduce crime and fear of crime	0	0	0	One of the sites is located within a SOA which does not have a high level of crime deprivation, however the other is within the 10% most deprived SOA (crime domain) . The policy itself has no additional policy requirements relating to crime or safety. Therefore there are no direct impacts on this objective by the policy itself. Emerging policy on DM7 PBSA requires development to have an onsite 24hour security presence, which should help to minimise any risk of crime.		
18. To increase equality and social inclusion	0	0	0	The policy has no additional policy requirements relating to this objective and therefore has no impacts.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	0	0	0	The policy will not result in any gains in employment floorspace, nor should it result in any losses, as the bus depot is in sui generis uses. In addition, retail uses would need to be retained at ground floor level on London Road to ensure policy compliance. Policy not considered to have any impacts on this objective.		

**Overall Summary**

- The policy was found to have potential for significant positive effects for the housing objective. The policy should lead to delivery of student accommodation, directly helping to meet their housing needs, and may also have positive effects on the local housing market, as could reduce the need to provide student accommodation in HMOs, thus potentially freeing up family-type housing or reducing the amount of housing that is changed to this use.
- The policy was found to have potential for positive effects for the objectives for travel, air/noise quality, greenhouse gas emissions, best use of land, and access. The location of the sites along a sustainable transport corridor should help to minimise the need to travel by car, also having air quality benefits, and it is anticipated that any increase in daily vehicle flow would be lower than the amount above which air quality can be significantly affected, due to other policy requirements that prevent car ownership. The type of development could provide opportunities to maximise energy efficient heating, such as communal heating, helping to minimise any increases in greenhouse gas emissions, particular for the site within a heat network cluster area. The developments could help to make the best use of land, through minimising the need for additional land-take, or through redeveloping redundant land. The sites help to facilitate good access to various services and public transport due to their locations.
- The policy was found to have potential for mixed impacts on the health objective. The delivery of PBSA on both sites could help to promote active travel and the accommodation provided should be a good quality in accordance with other policy requirements, benefiting health, however it is recognised that the sites suffer from high levels of road noise which could impact upon occupier amenity, as well as being a producer of noise issues and both are within the AQMA.
- The policy was found to have potential for adverse impacts on the water quality and flood risk objectives. One of the sites is within a Groundwater Source Protection Zone 1 and therefore development poses a risk to water quality. Both sites have a risk of surface water flooding and development could be at risk or increase the risk of flooding elsewhere.

### **Mitigation**

- CPP1 CP21 should ensure that PBSA that high density development is compatible with the existing townscape. Other heritage policies should ensure development does not detract from the character of the heritage assets.
- CPP1 CP8 sets the standards relating to water quality and consumption for both new build residential and non-residential development which would be applied and also requires development to safeguard water supplies if within a GSPZ.
- CPP1 CP8 requires development to reduce surface water flood risk and emerging CPP2 policy on SUDS requires development to incorporate SUDS to ensure there is a reduction in surface water leaving the site.
- Emerging CPP2 policy on Protection of the Environment, Pollution and Nuisance should protect both occupier amenity, as well as prevent against any noise nuisance arising from the development. In addition, the emerging policy on PBSA refers to the need to minimise adverse impacts on surrounding areas.

### **Recommendation**

There are no further recommendations.



## E1 Opportunity site for business and warehouse uses

### Options Stage

- Option 1) Do not allocate new sites for employment uses. Allow market to decide.
- Option 2) Allocate new sites for employment uses
- Option 3) Bring forward employment allocations as part of Strategic Mixed Use sites

This policy is considered to be reflective of option 2, however it is noted that employment will also be brought forward in strategic mixed use sites.

### Assumptions

- This SA includes an assessment of the impacts of the policy itself as well as considers the wider developmental impacts arising from implementation of the policy, particularly any site based impacts around Hangleton Bottom, however assumes generic impacts arising from development would be addressed (e.g. increased resource use).

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-	-	+	The policy does not contain any additional requirements relating to biodiversity. Although not a designated site of nature conservation importance, the site is partially greenfield in nature consisting of green open space, could have some biodiversity interest and therefore impacts could be adverse. CPP1 CP10 should provide mitigation and ensure any development results in net gains in biodiversity.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-	-	-	The site consists of areas of non-designated open space and small area of designated open space of the natural/semi-natural typology. Development of the site could result in loss of designated open space. Impacts could be adverse. CP16 allows for loss of open space when a site is allocated within a DPD although requires some on-site retention.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-	-	-	The policy does not contain any additional requirements relating to landscape sensitivities. Site is located adjacent to the SDNP and is therefore within the setting and could result in adverse impacts. Mitigation provided by CPP1 SA5 which requires development to be consistent with the purposes of the National Park and avoid significant harm.	I	P

				CP12 Urban Design requires development to have regard to impacts on the SDNP.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	0	0	0	There are no additional policy requirements relating to heritage assets or townscape. The site does not contain any heritage assets and is not adjacent or in close proximity to any. Therefore there are no direct impacts on this objective by the policy itself.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	-	-	The policy does not indicate the amount of floorspace that it would like delivered on the site and it is therefore difficult to predict the transport impacts that a development would have in this location. However as there is no development on the site currently, any new development would increase transport movements in the vicinity of the site. Although the site has reasonable access to a bus service, there is no bus service that directly serves the site and the site is located in very close proximity to the SRN which could influence travel choice. Development could therefore have adverse impacts on this objective. Mitigation: CPP1 CP9 Sustainable Transport should help to mitigate any transport impacts and emerging policy on transport should help to facilitate sustainable travel.	I	P
6. To improve air and noise quality	-/+?	-/+?	-/+?	The policy does not indicate the amount of floorspace that it would like to be delivered on the site, and it is therefore difficult to predict the transport impacts, including impacts on air quality, that employment development would have in this location. However, it is acknowledged that the site is outside the AQMA and therefore would need to produce an average of 500 additional daily vehicle movements to have an adverse effect on air quality. The site is adjacent to the A27 and suffers from high levels of road noise. However, some business uses can often generate significant noise, and therefore this location, which is located away from major residential areas and already suffers from high levels of noise, could be suitable for these purposes. Overall, impacts are mixed and uncertain.	I	T/P
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	The site is not within a GSPZ. There are no additional specific policy requirements relating to water quality or resources within the policy. CPP1 CP8 sets the standards relating to water quality and consumption for		

				<p>both new build residential and non-residential development which would be applied, and conversions would need to demonstrate how water resources are conserved.</p> <p>Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>The site has no risk of surface water flooding and is in floodzone 1. The site has groundwater at levels between 0.5m and 5m and therefore could be at risk of groundwater emergence. The site comprises open spaces which will have a role in absorbing water.</p> <p>There are no additional specific policy requirements relating to flood risk. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area.</p> <p>CPP1 CP8 sets the standards relating to energy consumption for non-residential development which would be applied.</p> <p>Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
10. To increase the city's resilience and ability to adapt to climate change	-	-	-	<p>The site currently comprises areas of open space which perform natural functions in terms of temperature regulation and absorption of water. Development of the site therefore may reduce the city's ability to adapt to climate change through change in form from a natural to urbanised form.</p> <p>Mitigation: CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this. CPP1 CP10 requires net gains in biodiversity to be delivered, which could include green infrastructure.</p>	I	P
11. To improve soil quality	0	0	0	<p>The site is not known to be contaminated.</p> <p>There are no additional specific policy requirements relating to remediation of contaminated land within the policy and overall the policy itself is considered unlikely to have any additional impacts on this objective.</p> <p>Emerging CPP2 policy on Polluted Sites should ensure that any necessary</p>		

				remediation takes place if required.		
12. To minimise and sustainably manage waste	+	+	+	As the site has no existing buildings on site, development will not be able to re-use any existing buildings or resources on site. The policy refers to the fact that the site is allocated for waste uses within the Waste & Minerals Local Plan and that development will only be permitted provided that the waste allocation is not prejudiced. This is considered to have positive effects for this objective.	D	P
13. To make the best use of land available	+	+	+	The site has been allocated for waste uses for some time however currently remains undeveloped. Delivery of employment uses on the site could help to make good use of an undeveloped site having positive impacts for this objective.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The site is allocated for employment uses. There will be no impacts on this objective.		
15. To improve the range, quality and accessibility of services and facilities.	0	0	0	The site is allocated for employment uses and will not deliver any other types of uses or facilities. There will be no impacts on this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Access to meaningful employment is one of the wider determinants of health. It is recognised that the site may be used for informal recreation currently, and that this may be lost, however as the site is adjacent to the SDNP, which can also be used for recreational purposes and activity, development of this site is not considered to reduce the ability to access open space or take part in physical activity. The policy should therefore have positive impacts on this objective.	I	P
17. To improve community safety, and reduce crime and fear of crime	0	0	0	Development of the site would introduce active uses in a location where there are currently none, which can help support community safety. However it is recognised that the site is within a SOA which does not suffer from high levels of crime deprivation and therefore it is unlikely that development in this location will have any effect on crime levels, or crime based deprivation or community safety. Impacts are negligible.		
18. To increase equality and social inclusion	+?	+?	+?	Provision of employment opportunities can help reduce employment and skills based deprivation, which is relatively high around the site. The policy does not require development to enter in training place agreements, as it is not strategic in nature. However despite this, employment uses on site could	I	P

				help facilitate access to employment and could help reduce employment deprivation. Impacts could be positive depending on take up by deprived communities.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	Policy could lead to an unspecified amount of new employment floorspace of B1 or B8 types. This would increase employment land supply and would contribute towards meeting the development needs of various employment sectors. It could also help support people access meaningful employment. Impacts should be positive.	D	P

### Overall Summary

- The policy was found to have potential for significant positive impacts for the economic development objective as the policy may help to increase employment land supply in the city and thus contributes towards meeting development needs of various employment sectors.
- The policy was found to have potential for positive impacts for the objectives for waste, making the best use of land, health, and equalities. The policy clearly refers to the need to ensure development does not prejudice any future waste development; the policy could help bring forward development on an un-used piece of land and make better use of the site; the policy could help to increase access to meaningful employment which is a wider determinant of health; employment-based development could help to reduce employment-deprivation through increasing access to opportunities, although would be dependent on take-up by deprived communities.
- The policy was found to have potential for adverse impacts for the objectives for biodiversity, open space, SDNP, travel, flood risk and climate change adaptation. The site comprises open space which could have potential for biodiversity. Open space would be lost through development. The site is adjacent to the SDNP and could have landscape sensitivities. The site is likely to be accessed by car due to its location and does not have particularly safe access to public transport. The site could be at risk of groundwater emergence. Development of the site is likely to result in loss of green infrastructure, which would otherwise contribute to adapting to climate change through absorption of water and temperature regulation.
- The policy was found to have mixed impacts for the air/noise quality objective. The site is outside the AQMA, however without knowing the amounts of development to be delivered it is difficult to gauge whether there would be a significant increase in vehicle movements and whether this would adversely affect air quality. The site suffers from high levels of road noise, however this may make it more suitable for some employment uses, which could be noisy and therefore less compatible with other uses, for example housing.

### Mitigation

- Development could result in losses in biodiversity. CPP1 CP10 should provide mitigation and ensure any development results in net gains in biodiversity.
- The site has landscape sensitivities due to proximity to the SDNP. Mitigation provided by CPP1 SA5 and CP15 which requires development to be consistent with the purposes of the National Park and avoid significant harm.

- New development in this location will increase vehicle movements in this location, particularly as public transport access is poor. A Transport Assessment would need to be submitted as part of a planning application to fully assess the impacts of development. Other adopted policy would apply, including CP9 Sustainable Transport and SPD14 Parking Standards which should help to ensure an appropriate amount of parking is provided in relation to the site's location. This should help to minimise any adverse transport impact.
- As above, it is unknown whether the increase in transport movements would exceed the amount over which there could be significant impacts on air quality. In addition to transport mitigation, emerging CPP2 policy should address air quality issues.
- Development could result in loss of land which provides natural functions and may help with climate change adaptation. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this. CPP1 CP10 requires net gains in biodiversity to be delivered, which could include green infrastructure.

### **Recommendations**

- There are no recommended changes. Mitigation to any developmental or site based impacts should be addressed through other policy.

