

Toad's Hole Valley draft SPD

**Strategic Environmental Assessment
Non-Technical Summary**

January 2017

Contents

Section 1	Purpose of this report
Section 2	Consultation
Section 3	What is the SPD seeking to achieve?
Section 4	What is the sustainability context?
Section 5	What is the sustainability baseline?
Section 6	How was the SEA undertaken?
Section 7	What are the appraisal findings at this current stage?
Section 8	What has the SPD process involved up to this point?
Section 9	Proposals for Monitoring

Section 1: Purpose of this report

- 1.1 This report is the non-technical summary of the Strategic Environmental Assessment (SEA) of the draft Toad's Hole Valley Supplementary Planning Document. The Toad's Hole Valley SPD and full SEA report are available on the city council's website <http://www.brighton-hove.gov.uk/content/planning/planning-policy/supplementary-planning-documents-spd>
- 1.2 The requirement for a Non-technical summary is set out in part 10 of Schedule 2 of the Regulations¹ and must include a summary of the following information:
- a. An outline of the contents and main objectives of the SPD
 - b. The relevant aspects of the current state of the environment and likely evolution without implementation of the SPD
 - c. The environmental characteristics of areas likely to be significantly affected
 - d. Any existing environmental problems including those relating to areas of particular importance
 - e. The environmental protection objectives which are relevant to the SPD
 - f. The likely significant effects on the environment
 - g. The measures envisaged to prevent, reduce and offset significant effects
 - h. An outline of why the alternatives were selected and a description of how the assessment was undertaken
 - i. A description of the measures to monitor implementation of the SPD
- 1.3 The purpose of the SEA is to ensure that the environmental, economic and social objectives are considered during the preparation of the SPD. It assesses the effects of the SPD against these objectives.
- 1.4 An SEA has been carried out and published at the following stages:
- Scoping Report (February 2015 and updated February 2016)
 - SEA – Draft THV SPD (January 2017)
- 1.5 In addition there has been one further stage of SEA that has not been published separately; the SEA of Issues and Options which was carried out in May 2016. This stage fed into the Strategic Environmental Assessment, January 2017 and work on the draft SPD, and the findings have been reported in this SEA.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004

Section 2: Consultation

2.1 The SEA, Non-Technical Summary and the draft Toad's Hove Valley SPD (January 2017) will be now published for consultation under the Town & Country Planning (Local Planning) (England) Regulations 2012. Formal representations can be made on any aspect of the draft SPD and this SEA.

2.2 Representations should be sent to:

Email: planning.projects@brighton-hove.gov.uk

Post: Planning Policy, Projects, Heritage and Design
1st floor, Hove Town Hall
Norton Road
Hove
BN3 3BQ

Section 3: What is the SPD seeking to achieve?

The SEA NTS must include:

- *An outline of the contents, main objectives of the SPD*

Contents of the SPD

- 3.1 The principles and aspirations for development on the Toad's Hole Valley site are established in City Plan policy DA7 Toad's Hole Valley.
- 3.2 The SPD supplements City Plan policy DA7 Toad's Hole Valley and provides guidance on implementation of this policy. The purpose of the SPD is to facilitate delivery of this policy's vision for a "modern, high quality and sustainable mixed use development (that helps to) meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods".
- 3.3 Once adopted it is expected that planning applications relating to this site will follow the guidance set out in the SPD and ensure recommendations are considered through the planning application process.
- 3.4 An outline of the contents of the SPD is as follows:

Section 1:	About this SPD
Section 2:	The site
Section 3:	Planning policy context
Section 4:	Development Response: Submitting a planning application Amounts of development Masterplanning and landscape-led design Place making Housing Office Education Community and retail Environment Transport and travel Public realm and green-blue infrastructure
Section 4	Development phasing and infrastructure delivery

Section 4: What is the sustainability context?

The SEA NTS must include:

- *The environmental protection objectives which are relevant to the SPD*

Relevant objectives

4.1 Plans, programmes and policies of relevance to the SPD have been reviewed and must be taken into account during the preparation of the SPD and by the SEA process. This includes European legislation as well as national legislation including the National Planning Policy Framework, regional policy and local strategies. Key messages and objectives that the SPD must support include:

- Protection and enhancement of biodiversity and ecological networks
- Protection of important landscapes
- Avoidance of flood risk
- Movement of waste up the waste hierarchy
- Protection and enhancement of water quality and quantity
- Promotion of energy efficiency and renewable energy
- Enable adaptation to future climate changes
- Improvement in air quality
- Management of environmental noise
- Minimise travel and improve access to sustainable forms of transport
- Improve access to services
- Protection of soils and prevention of soil pollution
- Protection of heritage assets and character of defined neighbourhoods
- Delivery of a wide choice of quality homes
- Ensure ongoing sustainable economic growth
- Promote social inclusion and reduce inequalities
- Improve health and reduce health inequalities including providing opportunities to lead healthy and active lifestyles
- Improve safety

4.2 The SEA Report Appendix A contains the full list of all relevant plans, policies and guidance reviewed as part of the SEA process.

Section 5: What is the sustainability baseline?

The SEA NTS must include:

- *The relevant aspects of the current state of the environment*
- *The environmental characteristics of areas likely to be effected*
- *Any existing environmental problems, particular those relating to an area of importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.*
- *The likely evolution without implementation of the Plan*

The relevant aspects of the current state of the environment and the environmental characteristics of areas likely to be effected

5.1 The SEA scoping report and analysis of baseline data identified the following sustainability challenges and issues of relevance to the local area and wider city in general:

5.2 Environmental

- Brighton & Hove's ecological footprint is higher than the regional and national average.
- The city contains various internationally, nationally and locally designated sites for biodiversity including an SNCI on the western bank of the Toad's Hole Valley site. However the SNCI is considered to be degraded.
- The SDNP covers approximately 40% of Brighton & Hove and is adjacent to the Toad's Hole Valley site, separated by the A27. The SDNP has recently been awarded Dark Skies Reserve status.
- There is a shortfall in certain typologies of open space across the city. The Hangleton & Knoll ward is deficient in children's play and allotments.
- Climate change is likely to result in more extreme weather events including flooding and droughts.
- Parts of the Toad's Hole Valley site are at higher risk of surface water flooding.
- The site overlies the Brighton Chalk Aquifer and is within a Groundwater Source Protection Zone. The current status of the groundwater resource is poor.
- The South East is within an area of high water stress.
- In Brighton & Hove, carbon emissions generated by energy consumption from domestic buildings make up the greatest proportion of total carbon emissions. The domestic proportion of carbon emissions is higher in Brighton & Hove when compared with the England and regional averages.
- Traffic congestion, volume and speed can be a problem within the local area.
- Despite the volume of traffic on adjacent roads, air quality is generally good within the wider area and the site is not located within close proximity to the AQMA. Road-related noise is an issue.

- The city contains a number of Public Rights of Way and Cycle Routes, some of which connect to the national network. There are no public rights of way or bridleways within the site, although a National Cycle Route is adjacent to the site although separated by the steep bank of the SNCI.
- The city has an attractive historic urban environment including numerous Listed Buildings and 34 Conservation Areas. The Woodland Drive Conservation Area is adjacent to the north-east edge of the site.
- The site has been identified as having potential for undesignated archaeological remains.
- Local Authority Collected Waste makes up around 21% of waste in the East Sussex and Brighton & Hove area. The amount of waste being sent to landfill has reduced in recent years, however recycling rates remained fairly static.

5.3 Socio-Economic Issues

- The city's population is growing. The latest estimate for the city's population is 281, 076 (ONS 2014)
- There is a high housing need across the city, including the need for affordable housing, with the average house price in the city costing over 10 times the average income.
- In 2015, out of 326 authorities, Brighton & Hove was ranked 102nd most deprived authority in England.
- Two Super Output Areas within the Hangleton & Knoll ward are within the 10% most deprived in England. This includes the SOA that covers the THV site. In this SOA the following domains contribute the most towards this high level of deprivation: income, employment, education, and income deprivation for older people.
- Child poverty varies greatly across the city. In Hangleton & Knoll 22% of children are defined as living in poverty (living in households in receipt of out of work benefits)
- In the Hangleton & Knoll ward, the proportion of the population whose activities are limited a lot by a health issue is higher than the Brighton & Hove and England average. The proportion of children at year 6 in this ward who are obese is also higher than the Brighton & Hove and England average.
- There is a need for different types of employment floorspace across the city.
- The proportion of people in employment in the Hangleton & Knoll ward is similar to the Brighton & Hove average.
- The proportion of over 16s in the Hangleton & Knoll ward with no formal qualifications is higher than the Brighton & Hove average. GCSE attainment is also lower than the Brighton & Hove average.
- Additional school places will be required across the city in order to meet the needs of an increasing population

Any existing environmental problems, particular those relating to an area of importance

5.4 There are no Special Areas of Conservation (SAC) or Special Protected Areas (SPA) within the THV site. The approximate distances to SACs or SPAs within 20km of Brighton & Hove are shown on the following table. Consideration of impacts on SACs and SPAs has been through the Habitats Regulations Screening Assessments undertaken for the Brighton & Hove City Plan. This screening discounted the likelihood of significant impacts arising from the City Plan, which includes Policy DA7 Toads Hole Valley.

Castle Hill SAC	Within BH boundary, approx 8km from site
Lewes Downs SAC	6km
Ashdown Forest SAC/SPA	19.5km
Arun Valley SAC/SPA	20km

The likely evolution within implementation of the SPD

5.5 The no SPD scenario was assessed as part of the Issues and Options Assessment as “Option 1 – City Plan only”. This is documented in detail in Section 3 of the SEA report and is summarised as follows:

- Mixed impacts on air quality, noise and transport
- Increased likelihood of piecemeal development that does not contribute towards a comprehensive regeneration scheme
- Less certainty regarding measures which increase land use efficiency
- Less certainty regarding the creation of a neighbourhood centre
- Less certainty regarding opportunities for ensuring and improving community and road safety
- Less certainty regarding improving access

Section 6: How was the sustainability appraisal undertaken?

The SEA NTS must include:

- A description of how the assessment was undertaken

Methodology

6.1 At this stage, the SEA has identified and evaluated the likely effects of the Toad's Hole Valley SPD against the SEA Framework. In addition, a cumulative analysis of the effects of the SPD sections has also been undertaken to determine the overall effect on each of the sustainability objectives.

6.2 The SEA Objectives used in this assessment were based on those used to assess the City Plan Part 1 and are as follows:

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy...
1. To prevent harm to and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.	<ul style="list-style-type: none"> • Protect and enhance locally designated sites (LNR, LWS) and LBAP priority habitats and species. • Increase access to biodiversity/nature for local people. • Provide opportunities to achieve a net gain in biodiversity • Recognise the multi-functional benefits of ecosystem services provided by green infrastructure • Improve links between existing and/or new green infrastructure <p>NB: there is not considered to be any risk to nationally or internationally designated sites from development in this location, therefore, a criteria which determines this is not considered to be relevant.</p>
2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning.	<ul style="list-style-type: none"> • Minimise the causes of air pollution • Support the development of cleaner technologies (e.g. low-emission vehicles) • Consider the potential for impacts from existing sources of air pollution • Take account of Air Quality Management Areas
3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes,	<ul style="list-style-type: none"> • Conserve the historic environment and its settings. • Respect, maintain and strengthen local character and distinctiveness • Promote high quality design that establishes a strong sense of place

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy...
townscapes, parks, buildings and their settings and archaeological sites effectively.	<ul style="list-style-type: none"> • Contributes to meeting the city's open space, sports and recreation requirements • Improve the quality or make better use of existing open space • Improve sustainable access to existing or new open space • Encourage the incorporation/creation of green/public/food-growing space within development
4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.	<ul style="list-style-type: none"> • Protect the landscape character and special characteristics of the SDNP and its setting, including its Dark Skies status • Protect and enhance important views to and from the SDNP • Encourage sustainable access to the SDNP • Promote sustainable tourism to the SDNP
5. To meet the need for decent housing, particularly affordable housing.	<ul style="list-style-type: none"> • Increase the availability of affordable housing • Provide a mix of housing types, sizes and tenures. • Address the housing needs for all sections of the community such as students, older people, disabled people, families, gypsies and travellers, and smaller households as appropriate to the location.
6. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed use, car-free and higher-density development.	<ul style="list-style-type: none"> • Encourage mixed-use development and delivery of sustainable communities that reduce the need to travel • Encourage the location of development close to where use of sustainable transport can be maximised • Improve public and sustainable transport infrastructure • Encourage health-beneficial forms of transport including cycling and walking • Improve road safety to encourage cycling and walking • Discourage car-ownership through car-free/low-car developments, or other techniques, in appropriate locations • Protect and enhance public rights of way
7. Minimise the risk of pollution to water resources in all development.	<ul style="list-style-type: none"> • Encourage remediation of despoiled, degraded or contaminated land • Improve water quality, including groundwater • Direct more vulnerable forms of development to areas of lower flood risk (all sources of flooding) • Incorporates measures to reduce flood risk including sustainable drainage solutions • Ensure development does not increase the risk of flooding elsewhere

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy...
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.	<ul style="list-style-type: none"> • Reduce water consumption • Maximise re-use of waste-water • Conserve and maintain water resources • Encourage development to meet environmental standards
9. To promote the sustainable development of land affected by contamination.	<ul style="list-style-type: none"> • Encourage remediation of despoiled, degraded or contaminated land • Encourage implementation of sustainable drainage solutions • Reduce the risk of surface water run-off
10. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment.	<ul style="list-style-type: none"> • Increase the quantity and quality of employment opportunities in a range of different sectors. • Provide employment opportunities for local people • Provide opportunities for local people to learn new skills
11. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors.	<ul style="list-style-type: none"> • Contribute towards meeting the development needs of various employment sectors, including requirements such as workspace • Support existing, new and emerging sectors • Enable the growth of high value, low carbon business • Promote sustainable tourism of all types including heritage-based tourism and tourism related to the natural environment.
12. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap	<ul style="list-style-type: none"> • Encourage and facilitate walking and cycling • Improve access to open space, the countryside and other opportunities for physical activity • Improve environmental quality and therefore minimise adverse impacts on health from various forms of pollution

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy...
between those with the poorest health and the rest of the city.	<ul style="list-style-type: none"> • Improve access to health facilities • Reduce health inequalities • Consider the needs of all members of the community, particularly the needs of those with protected characteristics
13. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.	<ul style="list-style-type: none"> • Facilitate improvements in community safety • Promote design that seeks to minimise crime • Promote design that seeks to improve road safety
14. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.	<ul style="list-style-type: none"> • Improve access to education, life-long learning and training opportunities, • Improve access to open space and opportunities for health-promoting forms of recreation • Improve access to employment opportunities and contribute towards a reduction in unemployment • Encourage the development of mixed communities
15. To engage local communities into the planning process	<ul style="list-style-type: none"> • Provide opportunities for local communities to be involved • Take into consideration ideas put forward by the community
16. To make the best use of land available	<ul style="list-style-type: none"> • Maximise efficient use of the site through high density development where appropriate • Maximise efficient use of the site through innovative design • Maximise efficient use of the site through multi-functional uses, such as SUDS/biodiversity/green-space; multi-functional buildings/space etc. • Promotes the retention of some ecosystem services provided by Greenfield sites
17. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and	<ul style="list-style-type: none"> • Encourage renewable energy generation • Encourage low/zero carbon development • Encourage energy efficient design • Facilitate development of decentralised energy networks • Encourage development to meet environmental standards

Sustainability Objective	Potential Sub-objectives / Decision Making Criteria Will the option or policy...
existing buildings.	
18. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.	<ul style="list-style-type: none"> • Considers the potential risks and consequences of flood risk and does not increase flood risk elsewhere • Incorporates sustainable drainage techniques, including those that have benefits for biodiversity. • Incorporates features that may help to maintain temperatures, such as green roofs, tree-planting and so on and recognise the services provided by ecosystems and green infrastructure. • Incorporates features to maximise efficient use of water resources.
19. To encourage new developments to meet adopted sustainable building standards.	<ul style="list-style-type: none"> • Encourage development to meet sustainable building standards <p>Also, see Objectives 8 and 18</p>
20. To promote and improve integrated transport links and accessibility to health services, education, jobs and food stores.	<ul style="list-style-type: none"> • Increase provision of key local services, including health, education, retail and community facilities. • Improve access to existing local services. • Enable communities to meet their day-to-day needs locally
21. To reduce waste generation and increase material efficiency and reuse of discarded material by supporting and encouraging development, business and initiatives that promote these and other sustainability issues.	<ul style="list-style-type: none"> • Promote building design that is resource efficient • Promote the use of secondary and recycled materials • Promote waste reduction, re-use, recycling and recovery • Facilitate improved accessibility to recycling and other waste management facilities

6.3 The following key was used throughout the appraisals with multiple symbols used to express greater significance.

+	Positive impacts / consistent with sustainability objective
+/-	Mixed impacts / potential for conflict with sustainability objective
-	Negative impacts / conflict with sustainability objective
?	Uncertain impacts / dependent on implementation
	No impact

Section 7: What are the appraisal findings at this current stage?

The SA NTS must include:

- *The likely significant effects on the environment.*
- *The measures envisaged to prevent, reduce and offset adverse effects*

The Appraisal

7.1 The SEA undertook appraisals of the topics within the section of the SPD entitled “Development Response” as these topics provided the main guidance for delivery. In order for the appraisals to consider and reflect the impacts of individual sections of the SPD, the appraisal did not assume that any other policy requirements would be met (e.g. City Plan policies), nor those of other sections of the SPD. Meeting City Plan policy requirements has been referred to in mitigation where appropriate. Therefore the following effects, particularly the adverse effects can be considered to be worst case scenario.

Amounts of Development

- 7.2 Overall, this section of the SPD performed well against the social and economic objectives by providing a mix of uses, helping to meet various housing, employment and education needs. The delivery of various uses should help to create a distinct neighbourhood within which residents can access their day to day needs. The amounts of development to be delivered will ensure the site’s capacity is utilised fully, making the most of the space available.
- 7.3 In terms of environmental objectives, this section of the SPD had largely adverse effects. This is based on the amount of development proposed and the additional population arising which has potential to increase consumption of resources. It is also based on the change in landform from a greenfield site, which provides various natural functions, to one of an urbanised form, which has potential for various adverse effects such as increased flood risk. Journeys made by car are considered to increase in this location, potentially with air quality impacts, although it is noted the area is not near to an AQMA. The site is also in close proximity to the SDNP and could have visual impacts.
- 7.4 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 (Toad’s Hole Valley), CP8 (Sustainable Buildings), and CP10 (Biodiversity), and through the SPD itself including the sections on Public Realm & blue-green infrastructure, Transport & travel, Master-planning & landscape-led design, Environment and Housing. In addition, it is recommended that the SPD refers to the need to undertake an ecological assessment, refers to opportunities to reduce/minimise light pollution impacts on the SDNP, and includes examples of measures that could reduce demand for water.

Masterplanning and landscape-led design

- 7.5 Overall, this section of the SPD performed well against most objectives. The consideration of issues such as the protection of landscape character in order to identify suitable locations for certain types of uses, including higher density buildings and clusters of uses, should help to minimise impacts on the SDNP and should also help to ensure the most efficient use of the site is made. The guidance should help create a vibrant, distinctive and viable neighbourhood centre that is well connected to the rest of the site, facilitating access to services and uses within the site, providing opportunities for social interaction and helping support good community safety.
- 7.6 This section of the SPD has potential for adverse impacts against the objectives relating to water pollution/flooding and climate change adaptation mainly based on the suggested location for higher density development within the area of the site which has the highest risk of surface water flooding. In addition, the massing of development that will be required may exacerbate the urban heat island effect in this location.
- 7.7 The impacts for Health & Safety were considered to be mixed, as although the creation of a neighbourhood centre and clustering of uses would have positive effects due to passive surveillance, there is potential for adverse impacts based on the potential for road safety issues associated with pupils accessing the school.
- 7.8 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8, and through the SPD itself including the sections on Public Realm & blue-green infrastructure and Environment. In addition, it is recommended that the SPD refers to the need to maximise road safety for pupils travelling to the site for school.

Place-making

- 7.9 This section of the SPD performed positively against all relevant objectives. In particular, the guidance provided should help to ensure the creation of a well-connected, identifiable neighbourhood centre through the clustering of certain uses including a public transport hub to facilitate access to sustainable transport. This section of the SPD was also found to be particularly beneficial for health, through facilitating active travel and access to health but also by ensuring the neighbourhood centre is socially inclusive. The creation of a vibrant and active neighbourhood centre will be essential in helping to deliver a sustainable and cohesive community.
- 7.10 There were no adverse or mixed effects resulting from this section of the SPD and therefore no further mitigation or recommendations are required.

Housing

- 7.11 This section of the SPD performed positively against all of the social and economic objectives and some of the environmental objectives including making the best use of land available and local distinctiveness. In particular, the guidance provided should help to maximise the amount of housing, including affordable housing on the site, with housing being one of the wider

determinants of health, therefore having benefits for health and reducing deprivation. Delivery of housing is intrinsically linked to economic growth and will create construction and service sector jobs.

- 7.12 In terms of most of the environmental objectives, this section of the SPD had largely adverse effects. This is based on the amount of development proposed and the additional population arising which has potential to increase consumption of resources and production of waste, although it is recognised that this section of the SPD refers to the achievement of high standards of sustainable building design. It is also based on the change in landform from a greenfield site, which provides various natural functions including a biodiverse resource, to one of an urbanised form, which has potential for various adverse effects such as increasing surface water flood risk. Journeys made by car are considered to increase in this location due to the increased population, potentially with air quality impacts, although it is noted the area is not near to an AQMA. The site is also in close proximity to the SDNP and development could have visual impacts.
- 7.13 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7, CP8 and CP10 and through other sections of the SPD including Public Realm, Environment, Transport, and Master-planning sections. In addition, it is recommended that the SPD refers to the need to carry out an ecological assessment, and refers to opportunities to reduce/minimise light pollution impacts on the SDNP.

Office

- 7.14 This section of the SPD performed particularly positively against the economic objectives. In particular, the guidance should help to ensure that a variety of business needs are met. This section of the SPD also performed positively against some of the social objectives, mainly due to link between employment and health, and also the possibility that it may help to reduce deprivation. The guidance suggests inclusion of employment uses within the neighbourhood centre which would help increase footfall, benefit community safety and contribute towards creating a distinctive local neighbourhood centre.
- 7.15 This section of the SPD had potential for adverse effects on some of the environmental objectives, some of which are linked to the resources used by new development and some which are linked to the change in landform from a greenfield site to one of an urbanised form, which has potential for various adverse effects as already described. Journeys made by car are considered to increase as a result of the office development and are considered likely to increase journeys made to the area, potentially with air quality impacts.
- 7.16 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8 and through other sections of the SPD including Transport, Master-planning, Public Realm, and Environment sections. In addition, it is recommended that the SPD refers to opportunities to reduce/minimise light pollution impacts on the SDNP.

Education

- 7.17 This section of the SPD performed positively against the social and economic objectives. It provides opportunities for employment and will provide access to education, training and employment, all of which are wider determinants of health. This section of the SPD also had potential to increase access to education and lifelong learning for adjacent communities, having positive impacts on reducing deprivation, although this is also considered to be uncertain and will depend on take-up. Although largely positive for health & safety, there were also uncertain impacts against this objective arising due to potential road safety issues, particularly for pupils traveling from outside the site. It also performed positively against some of the environmental objectives, including local distinctiveness, through the potential role of the school as a focal point in the neighbourhood centre, making the best use of land, and increasing access.
- 7.18 This section of the SPD has potential for adverse impacts on some of the environmental objectives, resulting from the resources used to create and sustain a 1,300 pupil intake school. In addition, as the school will be serving the wider Hove community, it has potential to increase the number of journeys made by car to the area, potentially having air quality impacts.
- 7.19 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8 and through other sections of the SPD including Transport, Master-planning, Public Realm, and Environment sections. In addition, it is recommended that the SPD refers to the need to maximise road safety for pupils traveling to the site for school.

Community and Retail

- 7.20 This section of the SPD performed positively against the social and economic objectives. It provides opportunities for employment and will provide opportunities for residents to meet their various day to day needs on site, including access to community uses, health and retail, all of which will help to reduce the need to travel having benefits for air quality. It also performed positively against some of the other environmental objectives, particularly the objective relating to local distinctiveness, through the role that community and retail uses would have in helping to create a neighbourhood centre, also having beneficial health and social impacts.
- 7.21 This section of the SPD had potential for adverse effects against some of the environmental objectives, particularly those relating to resource consumption and waste production, and also the objectives associated with transforming of a greenfield site into one of an urbanised form, including the risks of increased surface water flood risk and climate change adaptation.
- 7.22 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8, and through other sections of the SPD including Environment and Public Realm sections.
- 7.23 There were no recommendations resulting from the appraisal of this section SPD.

Environment

- 7.24 Overall, this section of the SPD performed positively against all of the environmental objectives. It provides guidance on delivering sustainable buildings, which will help reduce resource consumption and provides guidance on water management solutions which will help to reduce the risk of surface water flooding as well as having benefits for biodiversity and climate change adaptation. It also provides guidance on using biodiversity to help minimise visual impacts.
- 7.25 It also performed positively against health, mainly due to the delivery of energy efficient homes which can reduce the risk of fuel poverty for residents, and also due to the health and well-being benefits that can arise from access to biodiversity and open space.
- 7.26 No mitigation is required however it is recommended that the SPD could be strengthened by including examples of measures which could reduce water consumption.

Transport and travel

- 7.27 This section of the SPD performed positively against most of the environmental objectives. It provides guidance on measures which could increase active and sustainable travel, and reduce journeys made by car, having associated benefits for air quality. It also provides guidance on measures which may reduce traffic speeds on nearby roads, which would have benefits for road safety although may result in some localised air quality impacts. However, the SPD does suggest that reasonable levels of car-parking should be provided which may not help with discouraging car-use. This section also has positive impacts for access due to the provision of a network of pathways and roads that will link development both within the site and to adjacent communities.
- 7.28 The section of the SPD had potential for adverse impacts against water pollution/flood risk and climate change mitigation due to the delivery of a network of roads and paths that will increase the amount of hard impermeable surfacing throughout the area.
- 7.29 Mitigation for adverse impacts is considered to be provided through policies of the City Plan including DA7 and CP8 and through other sections of the SPD including the Environment and Public Realm sections. In addition, it is recommended that the SPD could refer to the positive effects that vegetation would have in relation to improving/maintaining air quality, and ensures that options for traffic calming do not have any unacceptable effects on air quality.

Public realm and blue-green infrastructure

- 7.30 This section of the SPD performed positively against most of the environmental objectives. It has particular positive benefits for biodiversity through the various suggestions for how to incorporate green infrastructure across the site including through nature-based sustainable drainage systems, opportunities for food growing and through the incorporation of the restored SNCI into the wider public realm network. These measures also have

benefits in terms of reducing the risk of water pollution/flood risk and climate change adaptation. The guidance to deliver an attractive and cohesive public realm would help to create a neighbourhood with its own sense of place, supporting local distinctiveness. This section of the SPD was also found to have particular benefits for making the best use of land available due to the guidance on how spaces can have multiple functions, e.g. open space providing water management.

- 7.31 This section of the SPD also performed positively against some of the social objectives, particularly those relating to health and health & safety through the provision of guidance that will help to deliver opportunities for recreation, activity and social interaction between all sections of the community.
- 7.32 Mitigation for uncertain impacts is considered to be provided through policies CP8 of the City Plan. There were no recommendations for changes resulting from the appraisal of this section of the SPD.

Recommendations

- 7.33 As indicated above, the appraisal suggested a number of recommendations in order to mitigate or reduce the likelihood of adverse effects or strengthen the positive effects of the SPD. The following table summarises the SEA recommendations for changes to the SPD. It also includes how the recommendations were incorporated into the SPD.

Table of Recommendations

Topic Section	Sustainability Objective	Potential Mitigation/Recommendations	Officer Response
Quantum of Development	Biodiversity	An ecological assessment would be required to determine the value of the site prior to any development taking place. This could be referred to in the SPD under paragraph 6.6.	Change made as suggested (see paragraph 5.6 of SPD)
	SDNP	There could be light pollution resulting on impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.	Changes made to page 4, 28, 31 and 32 of SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
	Minimise water use	The SPD does not include any reference to opportunities that may help reduce water demand, e.g. through harvesting rainwater. This could be included in the Environment section.	Incorporated into Environment section as suggested.
Masterplanning & landscape-led design	Air Quality	This section of the SPD refers to need for the siting, massing and form of buildings to seek to minimise exposure to air pollution for residents, although does not provide any examples. Could	Not implemented at this stage. Will liaise further with Environmental Health and

Topic Section	Sustainability Objective	Potential Mitigation/Recommendations	Officer Response
		the SPD provide some examples of design features which could help to minimise exposure to air pollution?	potentially include at next stage.
	Health & Safety	Travel to school for those from outside the site would need to be carefully managed to ensure that road safety of pupils was not compromised. Could the section on Education include a reference to ensuring future road safety? E.g. 6.33 ...with improved links from the south and west <u>that maximise road safety for pupils...</u>	Change made at paragraph 5.36 of SPD.
Place-making	No further recommendations		N/A
Housing	Biodiversity	An ecological assessment would be required to determine the value of the site prior to any development taking place. Although this is likely to form part of an EIA, this could be specifically referred to in the SPD under paragraph 6.6.	Change made (see 5.6 of SPD)
	SDNP	There could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.	See changes made to page 4, 28, 31 and 32 of SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
Office	SDNP	There could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD.	See changes made to page 4, 28, 31 and 32 of SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
Education	SDNP	There could be light pollution resulting in impacts on the SDNP which is now a designated Dark Skies Reserve. Guidance on opportunities to reduce/minimise light pollution could be referred to in SPD e.g. particularly that resulting from floodlighting of sports pitches/school grounds.	See changes made to page 4, 28, 31 and 32 of SPD. Wording in Appendix 5 as per suggested by SDNP Authority as part of I&O consultation.
	Health & Safety	Travel to school for those outside the site would need to be carefully managed to ensure that road safety of pupils was not compromised. Could the	Change made (see 5.36 of SPD).

Topic Section	Sustainability Objective	Potential Mitigation/Recommendations	Officer Response
		section on Education include a reference to ensuring future road safety? E.g. 6.33 ...with improved links from the south and west <u>that maximise road safety for pupils...</u>	
Community & Retail	No further recommendations		N/A
Environment	Minimise water consumption	This section of the SPD could be strengthened further, e.g. by incorporating a reference to opportunities to minimise water consumption, such as rain-water harvesting. This could be a measure that becomes more viable to include due to the economies of scale referred to in the SPD under para 6.40.	Change made (see page 27 of SPD).
Transport & travel	Air Quality	<p>This section of the SPD suggests using vegetation to help reduce traffic noise. This would also help with absorbing air pollutants. It is suggested that the SPD could be strengthened by also referring to this benefit.</p> <p>The potential for indirect air quality impacts arising from traffic calming measures would need to be considered. It is recommended that the SPD refer to this under the Noise and Pollution section, or under paragraph 6.45 e.g. “ensuring that options considered for traffic-calming do not have any unacceptable indirect adverse effects for noise or air quality”.</p>	Change made (see page 31 of SPD).
Public realm & blue-green infrastructure	No further recommendations		N/A

Assessment of overall/cumulative effects

7.34 The following table shows the impacts of each section of the SPD against the SEA Objective. The final column of the table indicates whether the overall impact against each of the SEA Objective is considered to be broadly positive, negative, mixed, uncertain or whether there are negligible/no impacts anticipated.

Table of Overall/Cumulative Impacts

	Quantum	Landscape	Place	Housing	Office	Education	Community retail	Environment	Transport	Public Realm	OVERALL IMPACTS
Biodiversity	-?	+?	0	-	0	0	0	++	+	++	-/+
Air Quality	-	+	0	-	-	-	+	+	+	+	-/+
Local dist.	+	++	++	+	+	+	++	0	0	+	++
SDNP	-	++	0	-	?	?	+	+	+	+	-/+
Housing	++	++	+	++	0	0	0	0	0	0	++
Transport	--	+	+	--	-	-	+	+	+	0	--/+
Water poll.	-	-	0	-	-	-/+	-	++	-	+	-/+
Water consump.	-	0	0	-/+	-	-	-	+	0	0	-/+
Contamination	?	0	0	?	?	?	?	0	?	?	?
Employment	++	+	+	+	++	+	+	0	0	0	++
Ec. Dev	++	+	+	+	++	+	+	0	0	0	++
Health	+	+	++	+	+	+	+	+	+	+	+
Safety	0	-/+	+	+	+	+?	+	0	+	+	+
Deprivation	+	0	+	+	+?	+?	0	0	0	0	+?
Engagement	0	0	0	0	0	0	0	0	0	0	0
Best use land	++	++	+	++	+	+	+?	+	+	++	++
Energy	-	0	0	-/+	-/+	-	-	++	0	0	-/+
CC adaptation	-	-	0	-	-	-	-	++	-	+	-/+
Bldg. Standards	0	0	0	+	+	-	-	++	0	0	-/+
Access	+	++	+	0	+	+	++	+	++	+	++
Waste	-	0	0	-	+	-	-	+	0	0	-/+

Discussion of Overall Effects

Positive Effects

7.35 The SPD may result in significant positive effects on housing, economic development and employment through the delivery of a variety of housing types, provision of land for a variety of employment uses, and provision of other wider community uses including shops, health and education, all of which will provide employment.

7.36 The SPD may result in significant positive effects on creating a locally distinctive neighbourhood through suggestions to cluster certain uses together in order to create a vibrant and distinct neighbourhood centre, including play, community, retail and higher density housing. The SPD should also have significant positive effects on increasing access through suggestions to deliver

a network of paths and roads that connect the different uses within the site, as well as connecting the site itself with the wider area.

- 7.37 The SPD may result in significant positive effects on making the best use of land through the amount of development anticipated, through suggestions of suitable locations for higher density housing, and through references to opportunities that combine certain features which would help to use land efficiently, such as open space incorporating for play and food growing, and using nature based sustainable drainage systems that have benefits for health and the environment.
- 7.38 The SPD may result in a range of positive effects for health through delivery of some of the wider determinants of health including housing, education and employment opportunities, the encouragement of activity through delivery of a network of public and open spaces as well as active travel, and through the delivery of a new neighbourhood centre providing opportunities for social interaction.
- 7.39 The SPD may result in positive effects on health & safety through opportunities which provide passive surveillance such as the creation of a neighbourhood centre, and opportunities to improve access particularly to adjacent areas.
- 7.40 The SPD may result in opportunities which reduce deprivation, including provision of housing, employment and education, however will depend on take-up.

Mixed Effects

- 7.41 The SPD may result in mixed impacts on biodiversity. Adverse impacts may arise due to the loss of a greenfield site which provides various ecosystem services as well as having potential ecological value, and due to the risk of increasing recreational pressure on the SNCI from the new community. However the SPD provides mitigation to these effects and may result in positive effects by including examples of opportunities for incorporating biodiversity across the site, such as chalk grassland green roofs, as well as suggestions to incorporate the restored SNCI within the public realm network.
- 7.42 The SPD may result in mixed impacts on air quality and transport. Adverse impacts may arise due to the increase in journeys made to, from and within the area from the increased local population and also due to travel for work and education purposes. The SPD provides some mitigation to these effects and may result in positive effects through measures which promote sustainable and active travel, such as pedestrian and cycle crossing points and extension of bus routes into the site.
- 7.43 The SPD may result in mixed impacts on the SDNP. Adverse impacts may arise resulting from the quantum of development delivered and the risk of adverse visual effects and light pollution. The SPD provides some mitigation to these effects and may result in positive effects through the requirement that the design of the development considers visual impact and strategic views,

suggesting suitable locations for high density development, as well as suggesting that a buffer should be considered.

- 7.44 The SPD may result in mixed impacts on water pollution/flooding and adapting to climate change. Adverse impacts may arise due to the urbanisation of a greenfield site and the increased risk in surface water flooding this may result in, as well as the potential for increased local temperatures due to massing and building form. The SPD provides some mitigation to these effects and may result in positive effects through guidance on delivering opportunities to manage water, such as nature-based sustainable drainage systems, and opportunities which help to regulate temperature, such as biodiverse features incorporated into buildings.
- 7.45 The SPD may result in mixed impacts on water and energy consumption and production of waste. Adverse impacts may arise due to the increased population and the resources consumed and waste generated. The SPD provides some mitigation to these effects and may result in positive effects through the promotion of high standards of building design, through guidance on water management and through guidance on opportunities which would reduce demand for energy.
- 7.56 The combination of implementation of the SPD with the City Plan Part 1 and other adopted policy should help to reduce the likelihood and significance of most of the adverse impacts identified above. Impacts which may be more difficult to mitigate are those related to transport.

Uncertain Impact

- 7.57 It is not known whether any of the land is contaminated or has potential for contamination. This is likely to be ascertained during the planning process. If contaminated land is found to be present on site then development of the site would provide the opportunity for remediation.

Neutral Impacts

- 7.58 There were considered to be neutral impacts against this objective mainly because the sections of the SPD appraised did not refer to community engagement. However it is noted that the section "Submitting a Planning Application" refers to the need to engage with the local community as part of the planning process.

Section 8: What has the SPD process involved up to this point?

The SA NTS must include:

- *An outline of the reasons for selecting the alternatives dealt with*

Consideration of alternatives

8.1 A Toad's Hole Valley SPD Issues and Options paper was produced and made available for consultation in March and April 2016. This set out the various issues that needed to be addressed by the SPD which included:

- Housing
- Office
- Education
- Community and Retail
- Environment
- Transport and Travel
- Public Realm and Blue/green infrastructure

8.2 For each issue, the following options were put forward:

- City Plan only
- Broad brush SPD
- Detailed SPD

8.3 The options were considered to be reasonably distinctive and were drafted to stimulate early stakeholder consultation rather than be reflective of policy.

8.4 An assessment was carried out to appraise each of the options against the Framework. Each option was assessed against the Sustainability Objectives and recommendations were made on how each option may improve in sustainability. Each option was appraised by examining the effects on the current baseline or its contribution towards meeting targets or statutory requirements. The appraisal attempted to identify the most sustainable options for each of the issues. The full results of this assessment are presented in the full SEA Report in Appendix D and in Section 3.

Preferred Option

8.5 Although there was not considered to be any consistent preferred approach, either of the options 2 and 3 seemed to provide greater potential for more significant positive impact than option 1 alone, as both provide greater details on measures which could result in greater positive effects if implemented.

8.6 Some of the positive effects associated with Option 3 seemed to be dependent on the production of various studies and it was unknown at the time of the appraisal whether these will be carried out in order to inform the SPD.

Draft SPD

8.7 The draft SPD has been produced, taking into account the results of early stakeholder consultation held in April-May 2016 on the Issues and Options paper and the results of the SEA of the Issues and Options. The draft SPD will now be published for city-wide consultation.

Section 9: Proposals for Monitoring

The SA NTS must include:

- *A description of measures envisaged concerning monitoring*

9.1 The indicators to be used to measure progress and impacts of the THV SPD will be finalised in the SEA post adoption statement. At this stage, monitoring indicators are still being defined. The following table presents some of the monitoring indicators that are being considered at this stage.

Table of proposed monitoring indicators

Effect/SE A objective	Proposed Monitoring Indicators
Delivery of housing	<ul style="list-style-type: none"> • Total amount of dwellings delivered • Amount and proportion of total dwellings of affordable dwellings delivered
Delivery of employment/economic development	<ul style="list-style-type: none"> • Amount (sqm) of B1 office space delivered
Local distinctiveness	<ul style="list-style-type: none"> • Amount (sqm) of A3 and D1 floorspace delivered • Amount (sqm) of open space provided
Water consumption	<ul style="list-style-type: none"> • Amount (percentage) of residential development achieving CP8 policy target of 110l/p/day
Energy consumption	<ul style="list-style-type: none"> • Amount (percentage) of residential development achieving CP8 policy target of 19% energy reduction over Part L standards
Building standards	<ul style="list-style-type: none"> • Amount of non-residential development achieving CP8 policy requirement of BREEAM excellent
Transport	<ul style="list-style-type: none"> • Amount (proportion) of car-free residential development delivered