

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

# **Proposed Submission City Plan Part Two**

## **Sustainability Appraisal**

April 2020



Brighton & Hove  
City Council

## Contents

Section 1 Introduction and background .....	4
1.1 Purpose of this report.....	4
1.2 Requirement for Sustainability Appraisal and Strategic Environmental Assessment .....	4
1.3 Local Development Plan .....	6
1.4 SA Scoping Report - 2016 .....	6
1.5 Sustainability Appraisal Report – 2018.....	7
1.6 Sustainability Appraisal Report - 2019/2020.....	8
1.7 Outline of Contents of the City Plan Part Two .....	8
Section 2 Methodology .....	11
2.1 Introduction .....	11
2.2 Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.....	11
2.3 Stage B Developing and refining the options and testing the effects .....	12
2.4 Difficulties encountered .....	14
Section 3 Sustainability Context, Issues and Sustainability Framework .....	15
3.1 Introduction.....	15
3.2 Biodiversity & geodiversity.....	15
3.3 Water quality and resources .....	17
3.4 Soil, waste and land resources .....	18
3.5 Air quality and transport .....	19
3.6 Climate change and flooding.....	21
3.7 Cultural heritage, landscape and open space .....	23
3.8 Population, human health and inequalities .....	25
3.9 Housing and community.....	27
3.10 Economy, employment, skills and education.....	29
3.11 Developing the SA Framework .....	31
3.12 Areas of Particular Environmental Importance.....	42
3.13 Habitats Regulations Assessment (HRA) .....	43
Section 4 Testing the Objectives of City Plan Part 1 against the Sustainability Appraisal Objectives .....	45
4.1 Introduction.....	45
4.2 Testing the City Plan Strategic Objectives against the Sustainability Appraisal Framework .....	45
4.3 Compatibility of sustainability objectives with City Plan Strategic Objectives.....	48
Section 5 Options and Policy Appraisals.....	49
5.1 Introduction.....	49
5.2 Assessment of Reasonable Alternatives and Policies, SA 2018.....	49
5.3 Assessment of Policies, SA 2019/2020 .....	49
5.4 Summary of Options and Policy Assessments.....	49
5.5 Development Management Policies .....	50

5.6	Special Areas policies.....	86
5.7	Strategic Site Allocations .....	88
5.8	Housing Sites .....	95
	H1 Housing & Mixed Use Sites .....	95
	H2 Urban Fringe Housing Sites .....	97
	H3 PBSA sites .....	99
5.9	Other Site Allocations .....	100
	E1 New Business and Warehouse Uses .....	100
Section 6 Site Appraisals of Site Allocations.....		102
6.1	Introduction .....	102
6.2	Housing and mixed use sites in the built-up-area (H1) .....	102
	Draft stage City Plan Part 2.....	102
	Proposed Submission stage City Plan Part 2 .....	104
6.3	Housing sites in the urban fringe (H2).....	105
	Draft stage City Plan Part 2.....	105
	Proposed Submission stage City Plan Part 2 .....	106
6.4	Purpose Built Student Accommodation (H3) .....	107
	Draft stage City Plan Part 2.....	107
	Proposed Submission stage City Plan Part 2 .....	108
6.5	Strategic Site Allocations (SSA1-SSA7).....	108
	Draft stage City Plan Part 2.....	108
	Proposed Submission stage City Plan Part 2 .....	109
6.6	Opportunity area for new business and warehouse uses (E1).....	109
	Draft Stage City Plan Part 2 .....	109
	Proposed Submission Stage City Plan Part 2 .....	110
Section 7 Mitigation .....		111
7.1	Introduction .....	111
7.2	Mitigation .....	111
Section 8 Cumulative and Synergistic Effects.....		116
8.1	Introduction.....	116
8.2	Cumulative Effects and Synergistic Effects.....	116
8.3	Discussion of Effects .....	118
8.4	Overall Summary .....	128
Section 9 How the SA has influenced CPP2.....		129
9.1	Introduction .....	129
9.2	Options Stage .....	129
9.3	Policy Stage.....	129
Section 10 Monitoring.....		136
10.1	Proposals for monitoring.....	136

<b>Appendix A Review of Plans, Programmes and Guidance .....</b>	<b>140</b>
<b>Appendix B SA Framework, Indicators and Baseline Information .....</b>	<b>144</b>
<b>Appendix C Consultation – Summary of representations and full transcripts .....</b>	<b>160</b>
<b>Appendix D The Selection and Rejection of Alternatives .....</b>	<b>173</b>
<b>Appendix E Likely effects without implementation of the plan .....</b>	<b>223</b>
<b>Appendix F1 SA Site Assessments – H1 Allocated Sites .....</b>	<b>226</b>
<b>Appendix F2 SA Site Assessments - H2 Allocated Sites .....</b>	<b>344</b>
<b>Appendix F3 SA Site Assessments - H3 Allocated Sites .....</b>	<b>396</b>
<b>Appendix F4 SA Site Assessments - Strategic Site Allocations .....</b>	<b>405</b>
<b>Appendix F5 SA Site Assessments - E1 Allocated Site .....</b>	<b>426</b>
<b>Appendix F6 SA Site Assessments of rejected sites / sites no longer being allocated .....</b>	<b>429</b>
<b>Sites rejected prior to draft stage .....</b>	<b>431</b>
<b>Sites rejected or not allocating at Proposed Submission Stage .....</b>	<b>446</b>
<b>Omission Sites – not allocating .....</b>	<b>471</b>
<b>Appendix G CPP2 Policy Appraisals.....</b>	<b>480</b>
<b>Housing, Accommodation and Community Policies.....</b>	<b>480</b>
<b>Employment, Tourism and Retail Policies.....</b>	<b>511</b>
<b>Design &amp; Heritage Policies.....</b>	<b>532</b>
<b>Transport &amp; Travel Policies.....</b>	<b>567</b>
<b>Environment &amp; Energy Policies .....</b>	<b>583</b>
<b>Special Area policy .....</b>	<b>616</b>
<b>Strategic Mixed Use Sites Policies .....</b>	<b>623</b>
<b>Housing Allocations Policies .....</b>	<b>666</b>
<b>Employment Allocation Policy.....</b>	<b>699</b>
<b>Appendix H Maps .....</b>	<b>705</b>

## 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<sup>2</sup> (SEA Regulations), of the Proposed Submission Stage City Plan Part Two (CPP2) Development Plan Document. This SA reflects the Proposed Submission CPP2, updated following amendments agreed at Full Council, 23.04.20.

This document will:

- State why an integrated SEA / SA is required
- Describe the SEA / SA process
- Summarise previous stages undertaken at Scoping Stage and draft City Plan Part 2 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.

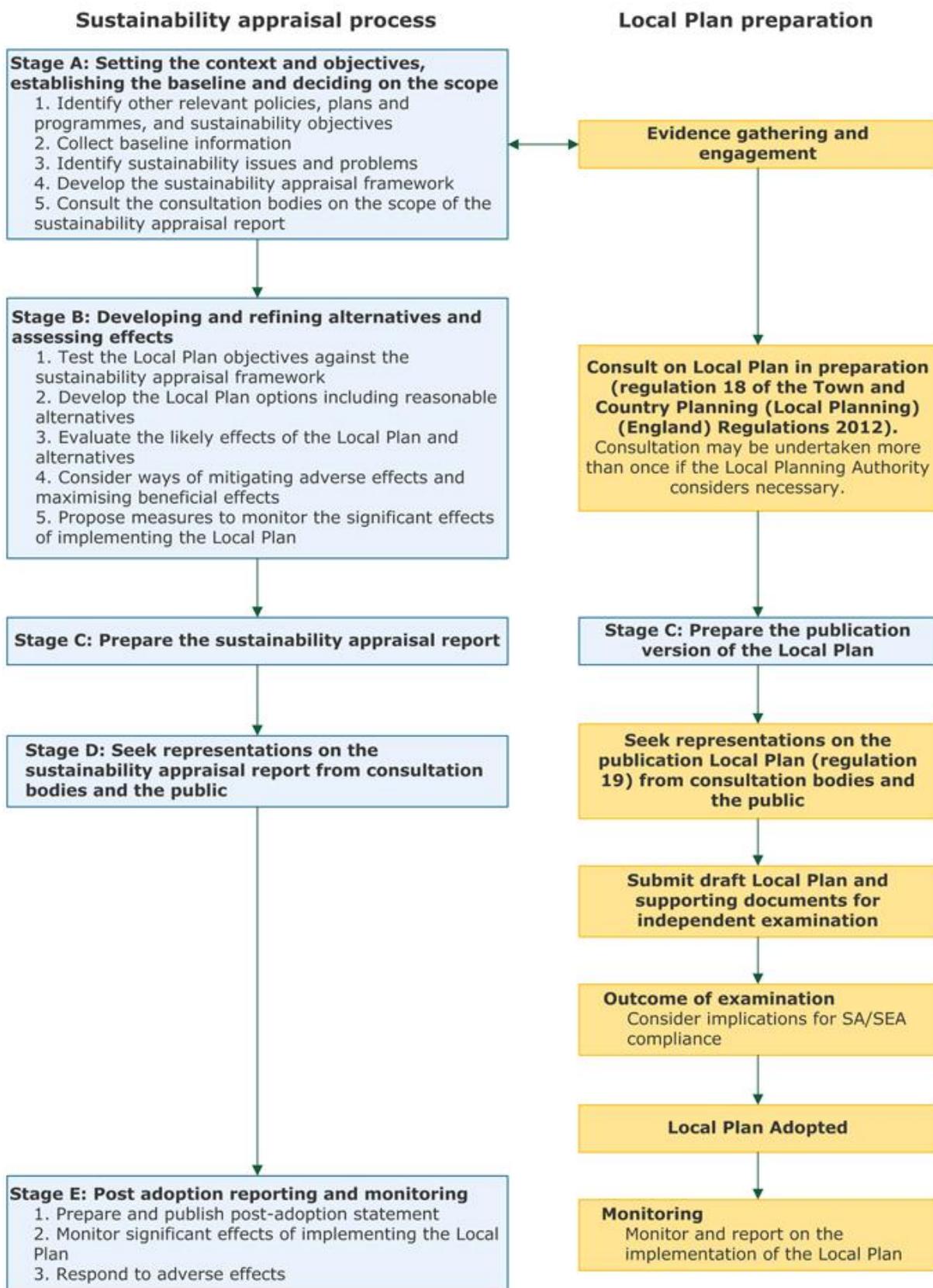
Although the requirements of SA and SEA are distinct, a single joint appraisal incorporating SA and SEA requirements can be carried out, in accordance with National Planning Practice Guidance, ensuring that all issues are considered. From herein, the combined document will be referred to solely as the Sustainability Appraisal (SA). The stages of SA/SEA and relevant stages of plan-making are illustrated in Figure 1.

---

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

<sup>2</sup> [SEA Regulations](#)

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>3</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>4</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 points (1) to (5) of Schedule 2 of the SEA Regulations. Scoping 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 (3)	The environmental characteristics of areas likely to be significantly affected	
Schedule 2	Any existing environmental problems which are	A3 – Sustainability Problems &

<sup>3</sup> [City Plan Part 1](#)

<sup>4</sup> [City Plan examination documents](#)

(4)	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)	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 were published in the SA of the draft City Plan Part 2 2018, Appendix C<sup>5</sup>.

### 1.5 Sustainability Appraisal Report – 2018

The sustainability appraisal of the draft City Plan Part 2 took place in 2018 and was published in June 2018 for a period of consultation. The SA, 2018, presented the findings of stage B in the SA process as shown in Figure 1 and in itself was stage C. The SA Report also met the requirements of the SEA Regulations Schedule 2 (6-9) as shown in Table 1.2

**Table 1.2 SEA/SA tasks undertaken in SA of draft City Plan Part 2, 2018**

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 programme.	B4 – Consider ways of mitigating adverse effects and maximising beneficial effects

<sup>5</sup> [SA of draft City Plan Part 2, 2018](#)

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 were carried out between January 2017 and May 2018, and included appraisals of policy options, appraisals of sites and appraisals of draft policies.

### 1.6 Sustainability Appraisal Report - 2019/2020

Following consultation on the draft City Plan Part 2 in 2018, revisions to some policies have taken place. As SA is an iterative process, further appraisal of revised policies has been undertaken to ensure the effects of the revised plan have been considered. This includes subsequent SA of any policies revised following amendments agreed at Full Council, 23.04.20. This stage of SA has not involved the consideration of alternative options, as this was considered at earlier stages and does not need to be repeated at each stage unless new options or circumstances require it. A summary of the options considered at options stage is provided within Section 5 and within Appendix D Selection & Rejection of Alternatives.

This SA therefore includes the tasks as shown in Table 1.3

**Table 1.3 SEA/SA tasks undertaken in SA of City Plan Part 2, 2019/2020**

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 – not undertaken at this stage (options assessed during SA 2018).
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
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 programme.	B4 – Consider ways of mitigating adverse effects and maximising beneficial effects
Schedule 2 (9)	A description of the measures envisaged concerning monitoring.	B5 – Propose measures to monitor the effects of the City Plan

This SA also includes a summary of the consultation comments and responses to them, submitted on the SA of the draft City Plan Part 2, 2018 in Appendix C.

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

The 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 and Residential Accommodation (C3)
- 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 Floorspace
- DM12 – Changes of Use within Regional, Town, District and Local Centres
- DM13 - Important Local Parades, Neighbourhood Parades and Individual Shop Units
- DM14 – Commercial and Leisure Uses at Brighton Marina
- DM15 - Commercial and Leisure Uses on the Seafront
- DM16 – Markets
- DM17 - Opportunity 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
- 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 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, Elm Grove
- 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 Madeira 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. This section also summarises what was undertaken within the SA 2018 and within the SA 2019.

### **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<sup>6</sup>. This stage has incorporated a review of relevant plans and policies with Appendix A providing an updated list. A summary of further relevant policy and guidance 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 baseline with regards to each topic section within the Scoping Report. This data has been updated as far as possible for this stage to ensure any new issues can be identified. A summary of the updated 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<sup>7</sup>. Maps have been updated where relevant for this stage and can be found in Appendix H.

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

Through the examination of the plans and policies, together with the findings of the updated 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 which has been updated at this stage to reflect any new policy as well as the updated baseline.

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

From the issues that were identified at scoping stage, a number of sustainability appraisal objectives were identified that formed the Sustainability Appraisal Framework. This 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 and have been used to assess the potential impacts of CPP1 Strategic Objectives, CPP2 policy options at draft stage as well as the policies. A separate framework, using the same Sustainability Appraisal Objectives but with different guiding criteria, 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 full the Scoping Report 2016.

---

<sup>6</sup> [SA Scoping Report 2016](#)

<sup>7</sup> [SA Scoping Report maps](#)

## 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 1 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 were again tested against this new framework at draft City Plan Part 2 stage in 2018. The full comparison can be found in Section 4 for information.

### 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. This assessment was carried out in 2018 and the results of these options appraisals were published in in Section 5 and Appendix D of the SA Report 2018.<sup>8</sup>

The general method used to assess each of the policy options was 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

Section 5 of this report includes a description of the options considered in the SA 2018 and a written summary of the preferred option.

No further options have been considered at this stage.

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

#### Site Assessments

Prior to sites being assessed through the SA framework in 2018, all sites underwent a sieving process which discounted sites on the following grounds in accordance with consideration of options considered for site allocations:

- sites not capable of being delivered within the plan period

---

<sup>8</sup> [SA Report 2018](#)

- site capacity (e.g. sites likely to deliver 9 or less housing units)
- sites with planning consent where development had commenced
- sites considered inappropriate for allocation based on policy constraints or existing allocations or uses
- findings from the Housing and Employment Land Study 2018<sup>9</sup>

All of the remaining sites were then 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. The SA process also was not 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 some criteria of the sustainability appraisal framework due to the need to accommodate development and meet local targets.

The site assessment process therefore 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 of all site allocations can be found in Appendices F1-F5. These have been updated in 2019 to take into consideration any further evidence, designations or results from studies. In addition, site assessments have been undertaken on any omission sites that have been identified through consultation or planning applications, these are included within Appendix F1 if allocated.

Appendix F6 includes sites which initially fitted the preferred options for allocation, but have since been rejected, for example, sites that have now commenced or sites that are no longer considered suitable for other reasons, e.g. availability of deliverability within the plan period. Appendix F6 also includes any omission sites that were put forward during consultation, that are not being allocated. Further information on how sites were identified for allocation can be found in the Site Allocations Topic Paper.<sup>10</sup>

### **Policy Assessment**

Following the options appraisals in 2018, the policies were drafted. Each policy was assessed against the SA Framework using the methodology as described under B2. The results of the policy appraisals at draft stage were published in the SA Report, 2018.<sup>11</sup>

The policies within City Plan Part 2 have since been revised to take into consideration any comments received during consultation at draft stage as well as any other emerging evidence or information from background studies. As SA is an iterative process, all of the policies have again been assessed at this stage against the SA Framework to ensure the effects of each policy and the plan as a whole have been identified. The SA has also been updated to consider all amendments approved at Full Council, 23.04.20.

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. Appendix G also includes a brief summary of the key changes to policy between draft and this stage.

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

---

<sup>9</sup> [Housing and Employment Land Study, 2018](#)

<sup>10</sup> [Site Allocations Topic Paper, 2019](#)

<sup>11</sup> [Sustainability Appraisal Report, 2018](#)

## **B5 - Mitigation and Limitations**

The SA appraisal process identifies where adverse impacts could be expected. In this case, mitigation is identified. 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 generic 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 for full details. In addition, a further review of new and emerging guidance, and additional analysis of baseline information was undertaken in spring 2019 to ensure that any new information has been considered. These are highlighted in this section where relevant.

The full list of documents reviewed as part of the context review can be found in Appendix A and the updated baseline information can be found in Appendix B.

This section summarises this information by topic.

### 3.2 Biodiversity & geodiversity

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019), with chapter 15 in particular dealing with conservation and enhancement of the natural environment, including biodiversity; the 25 Year Environment Plan (Defra, 2018) which seeks to achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife and for planning intends to embed an “environmental net gain” approach for development including for biodiversity; the Environment Bill (2019) which provides for the enhancement or improvement of biodiversity not just its maintenance in its current state, emphasises restoring spaces for nature and requires Biodiversity Net Gain as condition of planning permission; Local Wildlife Sites Study (BHCC 2018) which sets out the process undertaken for identifying new LWS and recommends a suite of LWS to be designated through CPP2; updated Habitats Regulations Assessment screening and Ashdown Forest Air Quality Assessment (2018) which both clarify that growth from Brighton & Hove will not affect the integrity of European sites within or in proximity to the city.

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

- Protect and enhance biodiversity
- Minimise impacts on existing and provide net gains in biodiversity
- Conserve, restore and enhance local spaces including local priority species and habitats
- Guide development to locations with least environmental value
- Recognise the wider benefits from natural capital and ecosystem services
- Enable development to enhance and link to natural networks, including the green network and Nature Improvement Area
- 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 although HRA assessments have discounted significant adverse effects.<sup>12</sup>
- The city’s SSSIs sites are in 100% favourable or unfavourable/recovering condition.<sup>13</sup> There is a need to avoid any detrimental impacts upon SSSI sites and seek to improve the condition of the unfavourable/recovering units further.

---

<sup>12</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20City%20Plan%20Part%202%20HRA%2028%20August%202018.pdf>

<sup>13</sup> <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

- The city contains other locally designated sites as well as BAP priority habitats and species which require protection and sympathetic management in order to maintain their special qualities.<sup>14</sup>
- Not all sites that support priority species have a formal designation and therefore could be at risk.
- Nature conservation sites provide a number of ecosystem services and 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.<sup>15</sup> 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, avoided and mitigated.
- There is a need to ensure any new habitats link into the existing Green Network/Nature Improvement Area.<sup>16</sup> The Nature Improvement Area, or similar landscape scale approach should be retained and enhanced.
- Human use and climate change are a threat to the city's biodiversity.<sup>17</sup>

#### 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.<sup>18</sup>
- Although some recent deterioration, the SSSIs should remain in 100% favourable, unfavourable/recovering condition with management.
- There are a number of species that require conservation action locally, and without practical intervention or management, these could decline.
- LNRs that are locally protected have management plans or management controls in place to seek to maintain the special qualities of the sites.<sup>19</sup>
- Additional sites designated as LWS should provide greater protection of the biodiversity found on these sites<sup>20</sup> however without positive management these could decline<sup>21</sup>
- Actions and projects arising from the BAP and the Biosphere programme have the potential to benefit local biodiversity, however there is a risk if these are not implemented.
- The effects of climate change could be a threat to some sites/species and could result in significant changes to habitat dynamics and species interactions.
- There is a risk of loss of habitats and species arising from development, particularly on urban fringe sites, however local policy that requires net gain should avoid this.
- There will be greater deficiencies of all typologies of open space, including 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.<sup>22</sup>
- The lack of data and monitoring for some sites means that it is difficult to identify trends.

<sup>14</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20LBAP%20-%20ADOPTED%20VERSION%20-%20TABLE%202.pdf>

<sup>15</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Open\\_Space\\_Sport\\_and\\_Recreation\\_Study\\_-\\_Final\\_Report\\_Mar\\_2009\\_3.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Open_Space_Sport_and_Recreation_Study_-_Final_Report_Mar_2009_3.pdf)

<sup>16</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Green\\_Network\\_for\\_Brighton\\_Hove\\_final\\_report.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Green_Network_for_Brighton_Hove_final_report.pdf)

<sup>17</sup> [http://jncc.defra.gov.uk/PDF/Pub10\\_Bio\\_&\\_CC\\_IACCF\\_2010\\_Web.pdf](http://jncc.defra.gov.uk/PDF/Pub10_Bio_&_CC_IACCF_2010_Web.pdf)

<sup>18</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20LBAP%20ADOPTED%20VERSION.pdf>

<sup>19</sup> <https://www.brighton-hove.gov.uk/content/leisure-and-libraries/parks-and-green-spaces/nature-reserves>

<sup>20</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Local%20Wildlife%20Sites%20Study%20Nov%202018.pdf>

<sup>21</sup> <https://www.gov.uk/government/statistical-data-sets/env10-local-sites-in-positive-conservation-management>

<sup>22</sup> City Plan Part 1 policy CP16 identifies that an additional 167ha of open space will be required by 2030.

### 3.3 Water quality and resources

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019), with chapters 14 and 15 of relevance dealing with conservation and enhancement of the natural environment, including consideration of water resources; the 25 Year Environment Plan (Defra, 2018) which seeks to improve water quality and for planning intends to embed an “environmental net gain” approach for development which includes wider natural capital benefits, such as flood protection and improved water quality; Environment Bill (2019) which seeks to protect water quality and requires improved water resources planning including drainage and wastewater planning; South East River Basin Management Plan (2016) which sets out the current state of the local water environment and sets objectives for protecting and improving waters; and Water for Life 2020-2025 (Southern Water, 2018) which acknowledges the potential future loss of resources through climate change and the challenge to meeting the needs of the future increased population.

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

- Avoid the pollution of water resources
- Protect and improve water quality with local groundwater to meet overall “good” status by 2027
- Reduce pressure on water resources
- Ensure the sustainable use of water
- Encourage water efficiency measures
- 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:

- The region is currently classified as an area of serious water stress due to the pressure on water resources.<sup>23</sup>
- Groundwater relies on recharge from rainwater. Lower than average periods of rainfall can result in short-term drought conditions.
- Future climate change related impacts, such as higher average temperatures and lower rainfalls will have an impact on groundwater recharge.<sup>24</sup>
- Increased demand for water due to population growth, in combination with impacts of climate change could lead to a water supply and demand deficit unless action is taken to conserve resources.<sup>25</sup>
- The overall current status of the Brighton Chalk Aquifer is poor (2016 data)<sup>26</sup>.
- The aquifer is susceptible to pollution<sup>27</sup> and the chemical quality is currently poor. 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 aquifer resource is under pressure and the quantity status is also poor due to abstraction rates.<sup>28</sup> 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.

---

<sup>23</sup> <https://www.southernwater.co.uk/our-drought-plan>

<sup>24</sup> <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

<sup>25</sup> <https://www.southernwater.co.uk/our-business-plan-2020-25>

<sup>26</sup> <http://environment.data.gov.uk/catchment-planning/WaterBody/GB40701G502500>

<sup>27</sup> <http://adurandousecatchment.org.uk/index.php/sub-catchments/brighton-chalk-block/brighton-chalk-block-projects/120-brighton-integrated-catchment-management-partnership>

- 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.<sup>29</sup> 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, through requirements set out in the River Basin Management Plan and with measures in place such as the Nitrate Protection Zone and Source Protection Zones.<sup>30</sup> Southern Water Management Plan also includes measures to remove nitrates further.
- Targets and actions set out in the Southern Water Management Plan should help to reduce demand and increase the resilience of water supply, and this could improve the “quantity” status by reducing abstraction rates.<sup>31</sup>
- Impacts from climate change, such as higher temperatures and lower rainfalls could impact on recharge.<sup>32</sup>
- Baseline data suggested that amount of water consumed per person should decrease due to metering programmes and local targets set in City Plan Part 1 for new houses. However, overall there is likely to be an increase in total water consumption due to the target to deliver 13,200 new homes.

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

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019), with chapter 11 supporting remediation of degraded, derelict and contaminated land, chapter 14 encouraging the reuse of existing resources, and chapter 15 dealing with conservation and enhancement of the natural environment, including consideration of soils and prevention of soil pollution; and the 25 Year Environment Plan (Defra, 2018) which seeks to use resources more sustainably and efficiently and sets a target of zero avoidable waste by 2050; Environment Bill (2019) which supports the move towards a circular economy.

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

- Protect and enhance valued 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, including derelict sites
- Promote the remediation of contaminated sites
- Prevent the creation of waste
- 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

---

<sup>28</sup> <http://adurandousecatchment.org.uk/index.php/sub-catchments/brighton-chalk-block/brighton-chalk-block-issues>

<sup>29</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/R001%20-%20LFRMS%20draft%20-%20Rev%204%20FINAL%20DRAFT.pdf>

<sup>30</sup> <https://www.gov.uk/government/Proposed-Submissions/south-east-river-basin-district-river-basin-management-plan>

<sup>31</sup> <https://www.southernwater.co.uk/our-business-plan-2020-25>

<sup>32</sup> <https://www.metoffice.gov.uk/research/collaboration/ukcp>

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 e.g. through environmental stewardship schemes<sup>33</sup> and nitrate vulnerable zones.<sup>34</sup> This 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.<sup>35</sup>
- 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.<sup>36</sup> 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.<sup>37</sup> There is a need to increase opportunities that facilitate reuse and recycling.

Likely future baseline:

- The inclusion of the city within the Nitrate Vulnerable Zone should improve nitrate deposition within soils.
- The proportion of housing development situated on brownfield land is likely to decrease in the medium-term, as development on the city's greenfield urban fringe sites comes forward, although should increase in the longer-term.
- 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**

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019) with chapter 15 dealing with conservation and enhancement of the natural environment, including improvement of air quality, particularly to ensure compliance with air quality objectives, and chapter 11 dealing with the promotion of sustainable transport and requires due consideration of transport issues; the 25 Year Environment Plan (Defra, 2018) which seeks to ensure air pollutant reduction targets are met and that health impacts are halved by 2030; the Environment Bill (2019) which commits to setting targets for fine particulate matter; the Clean Air Strategy (Defra, 2019) which seeks improvements to public health, protection of the environment, supports clean growth, sets out how to meet targets on UK emissions of air pollutants; the Clean Growth Strategy (DBEIS, 2017) which sets out proposals to decarbonise all sectors of the UK economy through the 2020s resulting in decreased carbon emissions and

---

<sup>33</sup> [http://Proposed Submissions.naturalengland.org.uk/file/116007](http://Proposed%20Submissions.naturalengland.org.uk/file/116007)

<sup>34</sup> <http://environment.data.gov.uk/catchment-planning/WaterBody/GB40701G502500>

<sup>35</sup> <https://www.brighton-hove.gov.uk/content/environment/noise-pollution-and-air-quality/contaminated-land>

<sup>36</sup> <https://www.eastsussex.gov.uk/environment/planning/development/amr1/>

<sup>37</sup> <https://www.eastsussex.gov.uk/environment/planning/development/amr1/>

increased economic growth, including increasing the shift to low-carbon transport. This will contribute towards achieving the government's revised target of achieving net zero carbon by 2050, with revisions to the Climate Change Act in order to set this target, rather than the previous target of achieving an 80% reduction by 2050, being progressed through parliament.

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

- Maintain and improve 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 do 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.
- Significantly 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.
- Ensure noise does not give rise to significant adverse impacts on health

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.<sup>38</sup>
- 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.<sup>39</sup>
- Transport-based carbon emissions form a quarter of all local carbon emissions.<sup>40</sup>
- Air quality continues to exceed the air quality objective in Brighton, Portslade and Rottingdean High Street, particularly in confined roads where the streetscape prohibits the dispersal of air pollutants.<sup>41</sup>
- Air quality monitoring suggests current levels are similar to 2002, although there have been improvements since 2010.<sup>42</sup>
- Traffic related noise is an issue at many roads and junctions.<sup>43</sup>
- 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.<sup>44</sup>

---

<sup>38</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/BHCC%20Local%20Transport%20Plan%204%20Document%20v260515.pdf>

<sup>39</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/BHCC%20Local%20Transport%20Plan%204%20Document%20v260515.pdf>

<sup>40</sup> <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

<sup>41</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2018%20air%20quality%20status%20report%20%28PDF%204MB%29.pdf>

<sup>42</sup> <https://www.brighton-hove.gov.uk/content/environment/noise-pollution-and-air-quality/air-quality-management-city>

<sup>43</sup> <https://data.gov.uk/dataset/environmental-noise-directive-end-noise-mapping-noise-mapping-agglomerations-england-round-2>

- There is conflict between different road-users, with cyclists, pedestrians and people using powered scooters being particularly vulnerable to road traffic accidents.<sup>45</sup>
- 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

#### Likely future baseline:

- Long term trends indicate that air quality in lower density areas and suburban areas will continue to improve and government strategies and local measures such as low-emission buses should support this trend.<sup>46</sup>
- Although trends suggest that NO2 concentrations in some city centre locations are improving, it is unknown whether air quality in these locations, particularly those which have a confined or narrow streetscape, will improve enough to meet the air quality objective.<sup>47</sup>
- National trends indicate an increase in car ownership however 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.<sup>48</sup>
- The overall amount of cars owned in the city is likely to increase, due to the anticipated increase in population associated with CPP1 housing targets.
- Congestion may worsen in some places in the long-term, based on an increase in population and associated car ownership.<sup>49</sup>
- Recent analysis suggests 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.<sup>50</sup>
- Local investment in cycling infrastructure, as well as local trends, suggest that travel by bike is likely to increase.<sup>51</sup>
- 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.<sup>52</sup>
- It is likely that road-traffic related noise will also increase, based on the likelihood that transport movements will continue to increase, although any significant shift to electric vehicles may help minimise this.

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

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019) with chapter 14 which deals with the challenge of climate change, flooding and coastal change, supports transition to a low carbon future and requires plans to take a positive approach to mitigating and adapting to climate change; the 25 Year Environment Plan (Defra, 2018) which states that all

---

<sup>44</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/BHCC%20Local%20Transport%20Plan%204%20Document%20v260515.pdf>

<sup>45</sup> <https://www.brighton-hove.gov.uk/content/parking-and-travel/travel-transport-and-road-safety/road-collision-and-casualty-data>

<sup>46</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2018%20air%20quality%20status%20report%20%28PDF%204MB%29.pdf>

<sup>47</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2018%20air%20quality%20status%20report%20%28PDF%204MB%29.pdf>

<sup>48</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/2011%20Census%20Briefing%20-%20Transport.pdf>

<sup>49</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Transport%20Assessment%20Addendum%20Report%20%28June%202014%29%20FINAL\\_0.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Transport%20Assessment%20Addendum%20Report%20%28June%202014%29%20FINAL_0.pdf)

<sup>50</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/2011%20Census%20Briefing%20-%20Transport.pdf>

<sup>51</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/2011%20Census%20Briefing%20-%20Transport.pdf>

<sup>52</sup> <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

possible action should be taken to mitigate to climate change, including continuing to cut greenhouse gases and ensure all decisions take into account the future extent of climate change; the Clean Growth Strategy (DBEIS, 2017) which sets out proposals to decarbonise all sectors of the UK economy through the 2020s resulting in decreased carbon emissions and increased economic growth, including improving business, industrial and domestic energy efficiency and accelerating the shift to clean power; the SFRA has also been updated, and Sequential and Exceptions tests undertaken which provide evidence for the City Plan Part 2 allocations and relevant policies. In addition, UK Climate Projections 2018 have been released providing an update on climate change trends and amendments to the Climate Change Act being progressed through parliament seeks to achieve the net zero carbon target by 2050 rather than achieving the 80% reduction from 1990s levels.

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 to help achieve the long-term goal of zero net carbon emissions from energy consumption
- Increase resilience to future climate change impacts through incorporation of climate adaptation techniques such as green infrastructure, permeable surfacing and shading as well as through physical protection
- Avoid inappropriate development in areas at risk of flooding by directing development away from areas of high flood risk where possible
- Ensure development does not increase flood risk 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:

- Climate change will increase the chance of milder, wetter winters and hotter drier summers with an increase in the frequency and intensity of extremes rain and heat events.<sup>53</sup>
- The proportion of carbon emissions from domestic sources per capita in the city is higher than the UK average (42% compared with 30% nationally).<sup>54</sup>
- The city has a substantial housing target; this could result in a net increase in carbon emissions from domestic sources despite higher standards for energy efficiency.<sup>55</sup>
- The city has a challenging carbon emissions reduction target to achieve. The city council has recently committed to achieving zero carbon by 2030. 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, to improve energy efficiency and support the transition to zero carbon, however the city has various constraints that may limit this, such as heritage and air quality issues.<sup>56</sup>
- Increased temperatures may result in higher demands for cooling and air conditioning within buildings, particularly existing buildings which are have not been built to be adaptable to climate change.

---

<sup>53</sup> <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

<sup>54</sup> <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

<sup>55</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20version%20cityplan%20March%202016compreswith%20forward\\_0.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20version%20cityplan%20March%202016compreswith%20forward_0.pdf)

<sup>56</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/060218-BHCC-CPP2%20Energy%20Study%20%28FINAL%20ISSUED%29.pdf>

- 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.<sup>57</sup> Development in other areas may also need to be situated in areas of higher flood risk, including flood risk from surface water, due to limited land availability.
- There is a significant amount of basement properties in the city which are at increased risk of flooding, particularly from groundwater flooding.<sup>58</sup>

#### Likely future baseline:

- It is anticipated that locally total carbon emissions from domestic sources will increase in the short term, based on the amount of new residential development that will come forward.
- Trends suggest that carbon emissions per capita are reducing from all sources and this should continue long-term due to local energy efficiency targets and government policy for decarbonisation and the net zero target, including carbon emissions from transport.<sup>59</sup>
- 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.<sup>60</sup>
- 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.<sup>61</sup> The risk of tidal flooding at Brighton Marina remains the same, and could increase based on climate change impacts.<sup>62</sup>
- The number of properties and people at risk from groundwater and surface flooding may increase due to predicted increases in periods of heavy precipitation resulting from climate change and the likelihood that new developments may be built in areas of higher flood risk, due to limited land availability.

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

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019) with chapter 16 deals with conservation and enhancement of the historic environment and requires policies to conserve assets in an appropriate manner and gives great weight to the asset's conservation; NPPF chapter 15 deals with the conservation and enhancement of the natural environment and requires policies to protect and enhance valued landscapes and gives great weight to conserving and enhancing beauty of National Parks; NPPF chapter 8 deals with promotion of healthy and safe communities and requires policies to be based on up-to-date assessments of open space needs and requires the protection of existing open space, sports and recreational buildings unless shown to be surplus to

<sup>57</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Strategic\\_Flood\\_Risk\\_Assessment\\_Jan\\_2012.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Strategic_Flood_Risk_Assessment_Jan_2012.pdf)

<sup>58</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/BHCC%20-Section%2019%20Report-%20Groundwater%20flooding%20v3%200.pdf>

<sup>59</sup> <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016>

<sup>60</sup> <https://www.metoffice.gov.uk/binaries/content/assets/mohippo/pdf/ukcp18/ukcp18-headline-findings.pdf>

<sup>61</sup> <https://www.coast2capital.org.uk/projects/shoreham-harbour-flood-defences-wha.html>

<sup>62</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Strategic\\_Flood\\_Risk\\_Assessment\\_Jan\\_2012.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Strategic_Flood_Risk_Assessment_Jan_2012.pdf)

requirements. The 25 Year Environment Plan (Defra, 2018) refers to enhancing natural beauty, heritage and engagement with the natural environment; The Heritage Statement (DCMS, 2017) recognises that heritage is an essential part of our culture and sets out how government will support heritage in order to maximise economic and social gains; Health & Wellbeing Strategy (BHCCG & BHCC 2019) recognises the importance of open space to support active living and contact with arts and culture to support good health.

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

- Preserve and enhance 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 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 qualities of the SDNP
- Identify opportunities for provision of new open space/sports facilities where required and ensure need is based on up to date assessment
- Improve links to all types of open spaces
- Maximise opportunities to provide green infrastructure and links to the existing green network/Nature Improvement Area
- Recognise the contribution that open space, sports, recreation, and culture make to health and well-being
- Increase opportunities to facilitate active lifestyles
- Ensure sufficient availability of good quality, accessible land for allotments.

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

- The city contains a wealth of heritage assets which need preserving.
- New development can be of detrimental impact on heritage assets; change and growth needs to be managed in a way that conserves and enhances heritage assets.<sup>63</sup>
- Heritage assets are at risk from vacancy, neglect and decay.
- The elevated and open nature of the Downs makes them visually sensitive to development located outside the National Park boundary and sensitive to loss of tranquillity from proximate urban areas.<sup>64</sup>
- The open space and outdoor sports 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.<sup>65</sup>
- There will be a need to retain and improve existing open space on sites wherever possible.
- Allotment provision varies across the city and waiting lists are in existence for most sites.<sup>66</sup>

Likely future baseline:

---

<sup>63</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Conservation%20Strategy%202015.pdf>

<sup>64</sup> <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

<sup>65</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Open\\_Space\\_Study\\_Update\\_Main\\_Report\\_11\\_04.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Open_Space_Study_Update_Main_Report_11_04.pdf)

<sup>66</sup> <https://new.brighton-hove.gov.uk/allotments/get-allotment/waiting-lists-allotments>

- Restrictions imposed by heritage designations together with planning controls should help to protect heritage assets from harm. However, permitted development could pose a risk to some heritage assets, unless further Article 4 Directions are introduced.
- The production of Character Statements and Management Plans for 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 recent funding or schemes including Stanmer Park, Valley Gardens and Old Town area. 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 design review of development proposals should continue 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.<sup>67</sup>
- Increasing traffic, urban development and light pollution may have an impact on the tranquillity and remoteness experienced in the South Downs National Park.<sup>68</sup>
- 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.
- Without new provision, 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.<sup>69</sup>

### 3.8 Population, human health and inequalities

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019) with chapter 8 dealing with the promotion of healthy, inclusive and safe communities, and requires policies and development to promote social interaction, to be safe and accessible, support healthy, active lifestyles with access to various facilities to meet needs; Prevention is Better than Cure (DoH, 2018) and the Health & Wellbeing Strategy (BHCCG & BHCC 2019) both seek to improve health and wellbeing and reduce health inequalities and recognises that various factors influence health including housing, neighbourhoods, education, safety, transport, food, leisure, greenspace and social networks; Annual Reports of the Director of Public Health (BH) and Joint Strategic Needs Assessments which provide information on local population change and highlights the need to prioritise prevention; and updated Food Strategy Action Plan (2018) which seeks to embed healthy and sustainable food in policy and planning.

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

- Avoid, prevent or reduce the likelihood of harmful effects on human health
- Reduce health inequalities and deprivation 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 and reduce crime and the fear of crime

<sup>67</sup> <https://www.brighton-hove.gov.uk/content/planning/planning-applications/designplace-review>

<sup>68</sup> <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf>

<sup>69</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Urban%20Fringe%20Assessment%20-%20Report%20%28June%202014%29%20FINAL\\_0.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Urban%20Fringe%20Assessment%20-%20Report%20%28June%202014%29%20FINAL_0.pdf)

- 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:

- 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. In addition, although life expectancy has increased, healthy life expectancy has decreased which will impact on health services.<sup>70</sup>
- 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.<sup>71</sup> 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.
- 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.<sup>72</sup>
- 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.<sup>73</sup>
- 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 and to prevent obesity-related poor health.<sup>74</sup>
- 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 and community safety concerns can prevent people from travelling in this way.

Likely future baseline:

- ONS predicts that by 2030 the population will have increased to 311,500 with an increase to 326,000 by 2040.<sup>75</sup> 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 2026 there will be an increase in the numbers of 0-15 year olds, a reduction in the number of 20-29 year olds, and increase in 30-44 year olds, a decrease in 45-54 year olds and 30-49 year olds, and significant increases in the over 55 years population.<sup>76</sup>
- The diversity of the city's population is anticipated to increase, particularly with people who are born in a different country.<sup>77</sup> Migration to the UK – by those seeking asylum and others – is

<sup>70</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Director%20of%20Public%20Health%20AR%202017%20%28PDF%209MB%29.pdf>

<sup>71</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Director%20of%20Public%20Health%20AR%202017%20%28PDF%209MB%29.pdf>

<sup>72</sup> <http://www.bhconnected.org.uk/content/needs-assessments>

<sup>73</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/Brighton%20%26%20Hove%20Equalities%20-%20Report%20Final.pdf>

<sup>74</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Director%20of%20Public%20Health%20AR%202017%20%28PDF%209MB%29.pdf>

<sup>75</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>76</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/4.1.1%20Our%20population%20JSNA%202016.pdf>

<sup>77</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/4.1.1%20Our%20population%20JSNA%202016.pdf>

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. However trends in healthy life expectancy suggest this will continue to fall. The gap between life expectancy between the least and most deprived areas appears to be widening.<sup>78</sup>
- Government and local strategies around healthier eating and activity should help to ensure the proportion of children who are obese continues to decrease and remain below national averages.<sup>79</sup>
- Although rates of obesity are lower in the city than the national average, nationally the picture suggests that fewer people year are being classified as a healthy weight and everyone is getting bigger.<sup>80</sup>
- Improvements in mortality rates from coronary heart disease are anticipated to improve, however the risk could increase again due to increased life expectancy.<sup>81</sup>
- The incidence of some cancers is increasing, including those related to people's lifestyle choices.<sup>82</sup>
- Educational attainment is likely to improve in the long-term, and the gap between attainment in disadvantaged pupils and others is anticipated to narrow<sup>83</sup>, although it is likely that this gap will still be significant.<sup>84</sup>
- 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 Brighton & Hove still suffers from significant deprivation compared to the rest of the south east, and 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

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019) with chapter 5 dealing with delivering sufficient supply of homes and requires policies to be informed by an assessment of local housing needs, to take into account unmet needs of neighbouring authorities, and ensure the size, type and tenure required for various groups is provided; Clean Growth Strategy (DBEIS, 2017) sets out proposals for decarbonising all sectors of the economy including improving homes through energy efficiency and low carbon heating; Build to Rent Study 2019 which tested the viability of various proportions of affordable rented accommodation concluding that viability may impact upon achieving the desired proportion of affordable rented, with 20% affordable rented still likely to be difficult to achieve and unlikely to provide a rent that is affordable in real-terms; Student Housing Study which found that the number of students in the city is likely to increase, that the amount of PBSA is anticipated to increase which may result in a reduction in students requiring accommodation from the private rented sector; Gypsies and Travellers Accommodation Assessment 2018, which found the future need for 11 pitches are within the area of BH that falls within the SDNP.

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

---

<sup>78</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/Life%20and%20death%20in%20Brighton%20and%20Hove%20-%20topic%20summary%202018.pdf>

<sup>79</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/7.2.4%20Healthy%20weight%20%28Children%20%20young%20people%29%20FINAL.pdf>

<sup>80</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/7.3.2%20Healthy%20weight%20%28Adults%29%20FINAL.pdf>

<sup>81</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/jsna/jsna-7.5.5-Coronary-heart-disease1.pdf>

<sup>82</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/260717%20Cancer%20combined%202017%20FINAL.pdf>

<sup>83</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/676596/SFR01\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/676596/SFR01_2018.pdf)

<sup>84</sup> <https://www.gov.uk/government/statistics/revised-gcse-and-equivalent-results-in-england-2016-to-2017>

- 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 at truly affordable levels to help meet identified needs
- Ensure that the future accommodation requirements of Gypsies & Travellers are met within the wider area
- 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.<sup>85</sup>
- The affordable housing need for the city is greater than the total housing target for the period to 2030.<sup>86</sup>
- 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.<sup>87</sup>
- There is a limited supply of land in the city; the good and efficient use of the land available 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, based on demographic projections, with demand exceeding supply even if the CPP1 annual housing target is reached.<sup>88</sup>
- 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.<sup>89</sup>
- 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 due to high purchase costs. The private rented market is likely to continue to be the greatest source of rented accommodation in the city.<sup>90</sup>
- The amount of affordable housing should increase, particularly on smaller sites through implementation of local policy, and through the New Homes for Neighbourhoods Programme, however will not meet local need.<sup>91</sup>
- 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.<sup>92</sup>

<sup>85</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2018%20%283%29%20Housing%20Market%20Report%20%28Jul-Sep%29.pdf>

<sup>86</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Assessment\\_of\\_Affordable\\_Housing\\_Need.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/Assessment_of_Affordable_Housing_Need.pdf)

<sup>87</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/GL%20Hearn%20HSG%20OAN%20Rprt%20%20Jun%202015.pdf>

<sup>88</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>89</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2017%20Housing%20Market%20Report.pdf>

<sup>90</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/2011%20Census%20Briefing%20-%20Housing.pdf>

<sup>91</sup> <https://www.brighton-hove.gov.uk/content/council-housing/new-homes-neighbourhoods>

- The number of people on the housing register is likely to increase due to in-affordable housing, although changes to the Housing Allocations scheme may mean this reduces in the longer-term.<sup>93</sup>

### 3.10 Economy, employment, skills and education

Further relevant policy and guidance that has been reviewed since the Scoping Stage 2016 includes the NPPF (2019) with chapter 6 supporting the growth of a strong, competitive economy and requires policies to create conditions in which business can invest, expand and adapt, puts significant weight on the need to support and encourage economic growth, and to address barriers to investment, including infrastructure; the Clean Growth Strategy (DBEIS, 2017) proposes to de-carbonise the UK economy and includes policies on accelerating clean growth and improving business and industry energy efficiency; the Industrial Strategy (DBEIS, 2017) which seeks to help businesses create better, higher paying jobs and boost productivity by encouraging innovation, providing good jobs, upgrading the UKs infrastructure and creating prosperous communities; the Coast to Capital Strategic Economic Plan (2018) which sets out priorities including delivering prosperous urban centres, develop business infrastructure, invest in sustainable growth, create skills for the future, promote better transport, improve digital connections and build a strong identify; Economic Strategy (2019) which seeks to develop the city into a productive and inclusive economy with four themes including delivering the space needed to grow, having a thriving visitor, retail and leisure offer, increasing skills to match the city's future needs, ensuring the benefits of growth are invested to support inclusion and supporting a circular economy approach.

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 affordable and available commercial space and quality transport infrastructure
- Encourage higher value jobs
- Provide a thriving 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 the regional and other retail centres
- Reduce unemployment and the number of people in poverty
- Improve education and skills so that all local residents are equipped to enter the labour market
- Provide sufficient school places across the city in locations where they are required

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, for instance those in the retail and tourism sectors.<sup>94</sup>
- There is a need to ensure the continuing growth of higher value sectors, such as those win the CDIT sector, whilst recognising the contribution that lower paid service sector jobs make to the local economy.<sup>95</sup>

---

<sup>92</sup> <http://www.bhconnected.org.uk/sites/bhconnected/files/2011%20Census%20Briefing%20-%20Housing.pdf>

<sup>93</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Allocations%20policy%20final%202016.pdf>

<sup>94</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20and%20Hove%20Economic%20Strategy%20-%20Full%20Evidence%20Base%20Report%20-%20FINAL.pdf>

<sup>95</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20and%20Hove%20Economic%20Strategy%20-%20Full%20Evidence%20Base%20Report%20-%20FINAL.pdf>

- Land in employment uses is being lost to residential development through permitted development rights. This will increase the pressure on remaining floorspace.<sup>96</sup>
- 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.<sup>97</sup>
- 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.<sup>98</sup>
- There will be an increasing need for school places, to meet future requirements.<sup>99</sup> 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.<sup>100</sup> 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.
- Housing in-affordability poses a risk to recruitment of workforce and workforce retention.

#### Likely future baseline:

- The proportion of high skilled jobs is expected to increase and low to mid skilled jobs are expected to decrease.<sup>101</sup> This will play a role in helping to increase average wages locally.
- Brighton & Hove is likely to continue to provide a large proportion of the jobs (c.35%) available within the wider sub-region and be strategically important economically.<sup>102</sup>
- The local economy is likely to continue to grow and new jobs are likely to be created.<sup>103</sup>
- Growing industries, such as green and low-carbon industries and digital industries are likely to continue to grow, through ongoing investment and support.<sup>104</sup>

<sup>96</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20AMR%20Commercial%201617.pdf>

<sup>97</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/BH\\_Employment\\_Land\\_Study\\_Review\\_Final\\_Report.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/BH_Employment_Land_Study_Review_Final_Report.pdf)

<sup>98</sup> <https://www.gov.uk/government/statistics/revised-gcse-and-equivalent-results-in-england-2016-to-2017>

<sup>99</sup> [https://present.brighton-hove.gov.uk/Published/C00000701/M00004660/AI00038426/\\$20140304101533\\_005427\\_0022559\\_SOP20132017v14250214.doc.pdf](https://present.brighton-hove.gov.uk/Published/C00000701/M00004660/AI00038426/$20140304101533_005427_0022559_SOP20132017v14250214.doc.pdf)

<sup>100</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20and%20Hove%20Economic%20Strategy%20-%20Full%20Evidence%20Base%20Report%20-%20FINAL.pdf>

<sup>101</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/City%20Employment%20%26%20Skills%20Plan%202016-2020.pdf>

<sup>102</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20and%20Hove%20Economic%20Strategy%20-%20Full%20Evidence%20Base%20Report%20-%20FINAL.pdf>

<sup>103</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20and%20Hove%20Economic%20Strategy%20-%20Full%20Evidence%20Base%20Report%20-%20FINAL.pdf>

<sup>104</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%26%20Hove%20Economic%20Strategy%20-%20Working%20Evidence%20Base%20-%20Executive%20Summary%20-%20October%2026th%202017.pdf>

- Public administration, education and health are likely to remain the highest employment sectors in the city and 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.<sup>105</sup>
- 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 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.<sup>106</sup>
- 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 to be lower than the Brighton & Hove and national average, and will be much lower than those living in the least deprived areas.<sup>107</sup>

### 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 (2016). 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.

Two separate SA Frameworks exist; one for the assessment of policies and one for the assessment of sites. Both use the same SA Objectives.

**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</li> </ul>

<sup>105</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/BH\\_Employment\\_Land\\_Study\\_Review\\_Final\\_Report.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/ldf/BH_Employment_Land_Study_Review_Final_Report.pdf)

<sup>106</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%26%20Hove%20Economic%20Strategy%20-%20Working%20Evidence%20Base%20-%20Executive%20Summary%20-%20October%2026th%202017.pdf>

<sup>107</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Director%20of%20Public%20Health%20AR%202017%20%28PDF%209MB%29.pdf>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
	biodiversity and green infrastructure <ul style="list-style-type: none"> <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 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>
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> </ul>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
	<ul style="list-style-type: none"> <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 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>
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>

Proposed SA Objective	Proposed Decision Making Criteria (Will the objective/option/policy...)
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 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>
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	<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> </ul>

<b>Proposed SA Objective</b>	<b>Proposed Decision Making Criteria (Will the objective/option/policy...)</b>
meet local employment needs.	<ul style="list-style-type: none"> <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 was added after the Scoping Report and prior to the draft Plan stage and was published to help guide a more accurate assessment and in order to better reflect available data. In addition, text that is double-underlined> (under objective 8) was added to better reflect the results of the SFRA and sequential/exception tests.

<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. <u>None of site has any risk of groundwater flooding (no risk on SFRA maps.)</u>
	+	Site is PDL: 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 (dark green on SFRA maps).</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 (dark green on SFRA maps).</u>
	0	
	-	Site is PDL: Site is situated within Flood Zone 1 or 2. <u>Site has a risk of SW flooding and/or has groundwater levels less than 5m below ground surface (pale green/yellow/red on SFRA maps), but the SFRA did not consider the site to require consideration by the sequential test</u> <sup>108</sup> Site is Greenfield: Site is situated within Flood Zone 1 or 2. <u>Site has a risk of SW flooding and/or has groundwater levels less than 5m below ground surface (pale green/yellow/red on SFRA maps), but the SFRA did not consider the site to require consideration by the sequential test.</u>
	--	PDL site located partially or wholly situated within Flood Zone 3a or 3b. Or, <u>site is larger than 1,000m<sup>2</sup></u> , is a PDL or Greenfield site in Flood zone 1 or 2 <u>and SFRA considered to be at higher risk of flooding from other sources and requires consideration by sequential/exception tests as: &gt;50% of site in surface water accumulation zone; or/and &gt;50% of site has groundwater levels between the surface and 0.5m (yellow/red on SFRA maps)</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.

<sup>108</sup> Although site has some risk of flooding, overall the SFRA considered this to be “lower risk” based on:

- Site is less than 1000m<sup>2</sup> and less than 50% of site in a surface water accumulation zone (e.g having a risk of SW flooding)
- Site is less than 1000m<sup>2</sup> and less than 50% of site has groundwater levels between the surface and 0.5m below surface.

Sites that did not meet these above criteria underwent the sequential/exceptions test and were considered to be at higher risk.

	--	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 (not derelict or vacant). 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</u>

		not result in loss of open space.
	+	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>109</sup> and the Habitats Directive<sup>110</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
------	------------------------------	------------------------	---------------------

<sup>109</sup> EC Directive 79/409/EEC

<sup>110</sup> EC Directive 92/43/EEC

Castle Hill SAC	Within boundary	Calcareous grassland and nationally scarce species	Undergrazing Fertiliser Use Air pollution – atmospheric nitrogen deposition <sup>111</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>112</sup>
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>113</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>114</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<sup>115</sup>. 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<sup>116</sup>. This screening concludes that there are no likely

<sup>111</sup> [http://Proposed Submissions.naturalengland.org.uk/file/6520392904605696](http://Proposed%20Submissions.naturalengland.org.uk/file/6520392904605696)

<sup>112</sup> [http://Proposed Submissions.naturalengland.org.uk/file/5534055007256576](http://Proposed%20Submissions.naturalengland.org.uk/file/5534055007256576)

<sup>113</sup> [http://Proposed Submissions.naturalengland.org.uk/file/5185212862431232](http://Proposed%20Submissions.naturalengland.org.uk/file/5185212862431232)

<sup>114</sup> [http://Proposed Submissions.naturalengland.org.uk/file/6679502935556096](http://Proposed%20Submissions.naturalengland.org.uk/file/6679502935556096)

<sup>115</sup> [https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Appropriate%20Assessment%20Update%20\(July%202014\)%20FINAL.pdf](https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Appropriate%20Assessment%20Update%20(July%202014)%20FINAL.pdf)

<sup>116</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/Brighton%20%20Hove%20City%20Plan%20Part%202%20HRA%2028%20August%202018.pdf>

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. A full Appropriate Assessment was therefore undertaken to assess the potential for air quality impacts on Ashdown Forest. This assessment confirmed that growth resulting from City Plan Part 1 and City Plan Part 2, with an increased trajectory to 2032, would not result in adverse effects that would affect the integrity of the Ashdown Forest SAC/SPA, either alone or in combination with growth from other areas<sup>117</sup>.

---

<sup>117</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/BH%20AQ%20Impact%20Assessment%20Final%20Aug%202018.pdf>

## **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 Strategic 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 travel.
- 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 Appraisals

### 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 at both draft and Proposed Submission stage.

### 5.2 Assessment of Reasonable Alternatives and Policies, SA 2018

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 were considered for each policy and assessed during the SA 2018 with each appraised against the SA framework to help guide the most sustainable approach. Following the appraisal, the policy was drafted informed by the SA results.

Section 5.5 onwards contains a summary of options considered for each policy. The full options assessments, which also describe the “no plan” option, were presented in the SA 2018.<sup>118</sup>

### 5.3 Assessment of Policies, SA 2019/2020

Some policies have been revised following consultation on the draft plan or as a result of emerging evidence. This SA therefore assesses the revised policies to enable the likely effects of each policy and the cumulative effects of implementing the plan to be determined. The entire policy has been re-assessed, rather than just the changes to it. No further consideration of options has occurred at this stage. In addition, any amendments approved at Full Council, 23.04.20 have also been reassessed through the SA process.

Section 5.5 onwards contains a summary of the findings of each policy assessment. The full policy assessments for this stage can be found in Appendix G, which includes an outline of key changes made to the policy/supporting text. 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 allocated can be found as follows:

- Appendix F1 – H1 site allocations
- Appendix F2 – H2 site allocations
- Appendix F3 – H3 site allocations
- Appendix F4 – SSA site allocations
- Appendix F5 – E1 site allocation
- Appendix F6 – rejected sites/sites not being allocated

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.

### 5.4 Summary of Options and Policy Assessments

Each table within this section contains:

- a description of the options considered for each policy at options stage,
- a summary of key findings of the preferred option,
- the predicted short-term SA scores for the draft policy (2018), and
- the predicted short-term scores and a description of the SA findings for the Proposed Submission stage policy (2019).

The preferred option which formed the basis of the policy is shown in bold text.

---

<sup>118</sup> [Sustainability Appraisal 2018](#)

## 5.5 Development Management Policies

DM1 - Housing Quality, Choice and Mix																			
Options	<p>(nb: 2 sets of options were considered as this final policy incorporated the policy on amenity, which was originally a stand-alone policy.)</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 of preferred options	<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 housing and space needs of people with certain protected characteristics are met.</p> <p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+?	0	0	0	0	0	0	0	0	0	0	0	-	++	0	++	0	+	+
Final Policy Appraisal	+?	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.</p> <p>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.</p> <p>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. The policy is also considered to be flexible in its approach, which should ensure that house-building is not inhibited through</p>																		

	<p>requirements.</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 of preferred options	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+	0	0	0	0	0	0	0	0	+	++	+	+	0	0	0
Final Policy Appraisal	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> <p>The policy is considered to have <u>negligible impacts</u> 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.</p>																		

<b>DM3 - Residential Conversions and Retention of Smaller Dwellings</b>	
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 polices, namely that which refer to National Space Standards (Housing Quality, Choice and Mix)</p>
Summary of preferred options	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																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+	0	0	0	0	0	0	0	0	++	++	0	+	0	+	0
Final Policy Appraisal	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>																		

<b>DM4 - Housing and Accommodation for Older Persons</b>																			
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 of preferred options	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	+	0	0	+	+	0	0	0	0	0	0	0	++	+	++	+	++	0
Final Policy Appraisal	0	+	0	0	+	+	0	0	0	0	0	0	0	++	+	++	+	++	0
Summary	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 met through support for a range of different types of housing and affordable housing																		

	<p>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.</p> <p>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 may lead to delivery of outdoor 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>
--	--

<b>DM5 - Supported Accommodation (Specialist and Vulnerable Needs)</b>																			
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 of preferred options	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	0	+	0	0	0	0	0	0	0	0	++	+	++	0	++	0
Final Policy Appraisal	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><b>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).</b></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>																		
Summary	<p><u>Options/Draft stage:</u> Although all options should result in positive impacts across all relevant objectives, at options/draft stage, option 3 had 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.</p> <p><u>Proposed Submission stage:</u> Amendments to policy made to reflect viability evidence. Policy now considered to be more reflective of option 2.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	0	+	0	0	0	0	0	0	0	0	++	0	++	0	++	+
Final Policy Appraisal	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. Although the policy now seeks a lower proportion of affordable housing than at draft stage, reflecting viability evidence, the policy is still found to be significantly positive for housing, particularly through the requirements for rents to be genuinely affordable, and is more likely to allow for delivery of BTR developments to come forward, compared to the draft version which could jeopardise delivery based on viability.</p> <p>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, particularly genuinely affordable 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 (HMOs)</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	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	- /+?	+	+	- /+	0	- /+	0	0	- /+	+	+?	+	++	0	+?	?
Final Policy Appraisal	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 different 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 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>																		

<b>DM8 - Purpose Built Student Accommodation</b>	
Options	<p>1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA</p> <p>2) Criteria based policy with no preferred sites identified</p> <p><b>3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.</b></p>
Summary	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 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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	-	-	0/-	+	++	++	0	-	0	-	0	0	+	++	+	+	+	0	+
Final Policy Appraisal	-	-	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 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 <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>																		

<b>DM9 - Community Facilities</b>	
Options	<p>1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)</p> <p>2) General policy to protect all community facilities (including pubs)</p> <p><b>3) Specific policy to protect community facilities and additional specific policy to protect pubs</b></p>
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.

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+?	++	+	0	0	0	0	0	0	+	0	++	++	+?	+	+
Final Policy Appraisal	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	<p>1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)</p> <p>2) General policy to protect all community facilities (including pubs)</p> <p><b>3) Specific policy to protect community facilities and additional specific policy to protect pubs</b></p>																		
Summary	<p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+?	+	0	0	0	0	0	0	0	+	0	++	++	+	+?	+
Final Policy Appraisal	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</p>																		

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.

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.

DM11 - New Employment / Business Floorspace																			
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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	Cc adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	- /+?	0	- /+	- /+	0	0	0	0	-?	+	++	0	0	+	0	+	++
Final Policy Appraisal	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 wider determinants of health and could help to reduce employment based deprivation. The policy could also have <u>positive impacts</u> on waste 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</p>																		

	<p>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 zero-exhaust emission infrastructure may reduce this, and the reference to insulation may help to reduce the risk of any noise nuisance.</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>
--	--

<b>DM12 - Changes of Use within Regional, Town, District and Local Shopping Centres</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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+	+	+	0	0	0	0	0	0	- /+	0	++	+	- /+	+	++
Final Policy Appraisal	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, as well as reflects and should maintain unique aspects of other retail areas. 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, best use of land, housing, health, community safety 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 flexibility of the policy allowing change of use to other non A uses should help to reduce vacancy in the longer-term and helps to make the best use of land. The policy allows some change of use to housing, having benefits for housing provision. 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 non-A use which may increase access to health</p>																		

for example. The policy should result in a good mix of uses, 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, particularly as the length of time that marketing evidence must be demonstrated has been reduced. 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.

<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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+	+	+	0	0	0	0	0	0	+	0	++	+	+	+	+
Final Policy Appraisal	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, housing, 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 allows change of use to housing in certain circumstances. 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 - DM14 Commercial and Leisure Uses at 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>

	3) Have a single general policy in CPP2 covering retail frontage and changes of use																		
Summary	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	0	+	0	0	0	0	0	0	0	+	0	++	+	+	0	++
Final Policy Appraisal	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, housing, 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 support provision of housing; 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 - Commercial and Leisure Uses on the Seafront</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	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	-	+	0	+	-	-	0	+	0	0	0	0	+	0	+	+	+	0	++
Final Policy Appraisal	-	+	0	+	-	-	0	+	0	0	0	0	+	0	+	+	+	0	++



	<p>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.</p> <p>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.</p>
--	--

<b>DM17 - Opportunity Areas for New Hotels and Safeguarding Conference Facilities</b>																			
Options	<p>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).</p> <p>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</p> <p><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></p>																		
Summary	<p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	-	0	0	-	+	+	-	-	0	0	?	-	+	0	0	0	+	0	++
Final Policy Appraisal	-	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>
--	---

DM18 - High Quality Design and Places																			
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	<p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	+	+	++	+	0	0	0	0	0	0	0	0	0	0	+	+	0	0
Final Policy Appraisal	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, reducing greenhouse gas emissions, reducing waste, 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; should reduce greenhouse gas emissions and reduce waste through encouraging reusing/recycling materials where possible in line with the circular economy principles; 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>																		

DM19 - Maximising Development Potential	
Options	1) No specific policy framework to ensure that new development maximises site potential and

	<p>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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	- /+?	+	- /+?	- /+?	0	0	0	0	0	0	0	+	++	++	+	- /+	0	0	++
Final Policy Appraisal	- /+?	+	+	- /+?	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, SDNP, 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, whilst ensuring the impacts on landscape are considered. 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 biodiversity 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.</p>																		

<b>DM20 - Protection of Amenity</b>	
Options	<p>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).</p> <p><b>2) Progress Local Plan Policy QD27 into city-wide criteria-based policy.</b></p> <p>3) Amenity issues incorporated into other policies, including those for allocated</p>

	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	0	0	0	0	0	0	0	0	0	-	0	0	++	+	0	0
Final Policy Appraisal	0	0	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 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.</p> <p>The policy refers to situations whereby over-looking could provide natural surveillance, potentially having <u>positive benefits</u> for community safety.</p> <p>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.</p>																		

<b>DM21 - Extensions and Alterations</b>																			
Options	<p>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.</p> <p><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></p> <p>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).</p>																		
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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	+	+	0	0	+	0	+	0	0	0	+	+	0	+	0	0	+
Final Policy Appraisal	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, equalities 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; should result in design that is accessible and inclusive 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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	++	+	+	+	0	+	+	++	0	++	0	0	+	0	0	++	0	0	0
Final Policy 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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	++	0	0	0	0	0	0	0	0	0	0	+	0	+	+	+
Final Policy Appraisal	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Draft Policy Appraisal	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	+
Final Policy Appraisal	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+
Summary	<p>The policy should result in <u>positive impacts</u> for the objectives relating to SDNP, heritage/townscape, health, 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, requires consideration of amenity impacts such as those caused by lighting and noise, and should help to bring forward successful applications, which will help to promote economic activity.</p>																		

<b>DM25 - Communications Infrastructure</b>																			
Options	<p>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.</p> <p><b>2) Criteria based telecommunications policy</b></p>																		
Summary	<p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	0	+	++	0	0	0	0	0	0	0	0	+	0	+	0	0	0	+
Final Policy Appraisal	+	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 and the built environment as should ensure heritage assets are conserved or enhanced.</p> <p>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.</p> <p>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.</p>																		

<b>DM26 - Conservation Areas</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 Conservation Areas</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 Conservation Areas to be addressed, and also has the added benefit of addressing any local issues specific to these assets.</p>

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
Final Policy Appraisal	+	+	+	++	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 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.</p>																		

<b>DM27 - Listed Buildings</b>																			
Options	<p>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></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 listed buildings to be addressed, and also has the added benefit of addressing any local issues specific to these assets.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	++	0	0	0	0	0	0	0	+	+	+	0	0	0	0	+
Final Policy Appraisal	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 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</p>																		

	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	++	0	++	0	0	0	+	0	+	0	+	+	0	0	+	0	0	0
Final Policy Appraisal	+	++	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 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.</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 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.</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>																		

<b>DM29 - The Setting of 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 The Setting of 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 the setting of heritage assets to be addressed, and also has the added

benefit of addressing any local issues specific to these assets.																			
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+?	+?	+	++	0	0	0	+?	0	+?	0	0	0	0	0	+?	0	0	+
Final Policy Appraisal	+?	+?	+	++	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.</p> <p>The policy also has <u>potential for 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	<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 the registered parks and gardens to be addressed, and also has the added benefit of addressing any local issues specific to these assets.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	+	++	0	0	0	+	0	+	0	0	+	0	0	+	0	0	+
Final Policy 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</p>																		

	<p>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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	+	+	++	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+
Final Policy Appraisal	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

	<p>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</p> <p>3) No site specific policy but rely on a combination of other policies in CPP2 covering the different types of heritage asset.</p> <p><b>4) Have a specific policy in CPP2 on The Royal Pavilion Estate</b></p>																		
Summary	<p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	0	++	+	0	0	0	0	0	0	0	0	0	+	+	+	+	+
Final Policy Appraisal	+	+	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 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 &amp; Garden, through the various measures which would be supported, and result in a more unified historic estate.</p> <p>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.</p>																		

<b>DM33 - Safe, Sustainable and Active Travel</b>																			
Options	<p>1) No additional policy – rely on CPP1 Policy CP9</p> <p><b>2) Policy setting more detailed requirements regarding safe and sustainable/active travel</b></p>																		
Summary	<p>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.</p> <p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	?	?	0	++	++	0	0	+	0	0	0	0	0	+	++	++	++	+
Final Policy	0	?	?	0	++	++	0	0	+	0	0	0	0	0	+	++	++	++	+

Appraisal																				
Summary	<p>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.</p> <p>The policy has potential for <u>positive impacts</u> 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.</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>																			

<b>DM34 - Transport Interchanges</b>																			
Options	<b>1) General criteria based policy in support of developments</b> 2) Specific site allocations 3) No policy																		
Summary	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal		0	+	+	- /+ ?	+?	-?	-?	+	-?	?	0	0	0	+	+	+	+	+
Final Policy Appraisal	+	+	+	+	- /+ ?	+?	-?	-?	+	-?	?	0	0	0	+	+	+	+	+
Summary	The policy has potential to have <u>positive impacts</u> for the objectives relating to the biodiversity, opens space, 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 biodiversity, open space and SDNP through the requirement to evaluate any impacts and to minimise visual impacts; should protect the historic built environment and through the requirement to minimise visual impacts and 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																		

	<p>remediation of contaminated sites, depending on the site developed, therefore improving soil quality. 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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	0	++	++	0	0	+	0	0	0	+	0	+	++	+	+	+
Final Policy Appraisal	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.</p> <p>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</p>																		

	<p>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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	0	++	++	0	0	+	0	0	0	+	0	+	+	+	+	+
Final Policy Appraisal	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 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.</p>																		

<b>DM37 - Green Infrastructure and Nature Conservation</b>	
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>
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.

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	++	++	+	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	0
Final Policy Appraisal	++	- /+	+	0	0	+	+	+	+	+	0	0	+	0	0	+	0	0	0
Summary	<p>The policy is considered to have <u>significant positive impacts</u> on the biodiversity objective. This reflects the overall positive aspirations of the policy, which should result in safeguarding of existing, and incorporation of new, green infrastructure, also having wider biodiversity benefits; the fact that the policy should enhance various nature conservation features, such as protected species and habitats, and ancient woodland. It also reflects the strong criteria based approach which sets out the requirements that proposals must meet in order for development on designated sites to be approved; this should ensure the objectives of the designations are not undermined, should secure long-term enhancement through management, and should achieve net gains in biodiversity. Additional wording added as a result of the SA at Proposed Submission stage should ensure that the requirements for mitigation and net gains apply to all sites, including those allocated.</p> <p>The policy should also have a range of <u>positive impacts</u> on objectives that relate to the natural capital 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, through references in the supporting text for developments to achieve greater reductions in CO2 emissions; contributes to make good use of land available, through multi-functional nature of green infrastructure; and could positively impact upon the SDNP through the protection of sites of nature conservation importance located at the boundary which may also contribute to its landscape value.</p> <p>The policy should also have <u>positive impacts</u> for health, through protection of green infrastructure that provides opportunities for physical activity, through the improvement in environmental quality and ensuring resilience to climate change that is delivered through natural capital, and due to the link between accessing the natural environment and good mental health and well-being.</p> <p>The policy is considered to have <u>mixed impacts</u> on the objective for open space. This reflects the positive aspirations of the policy in relation to safeguarding the green infrastructure network and integration of green infrastructure into schemes; however also reflects the nature of the policy and the losses in open space that would result from development on protected sites, the majority of which also have an open space designation, which is not required to be mitigated within the policy.</p>																		

DM38 - Local Green Spaces	
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	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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	++	+	+	0	0	0	+	0	+	0	0	0	?	0	+	0	0	0
Final Policy Appraisal	+	++	+	+	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, access 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. Policy should help maintain or improve access to sites as a form of outdoor sports space. Access to open space contributes towards good physical health and mental wellbeing.</p> <p>The policy also has <u>positive impacts</u> on the objective for housing delivery, as although the sites will be protected as a green space through the LGS designation, some areas adjacent to the sites have been identified as having potential for housing and access may be required through it.</p>																		

<b>DM39 - Development within the Seafront</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.

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	0	-	0	0	0	++	0	++	0	0	+	0	+	+	0	+	+
Final Policy Appraisal	+	+	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><i>Light pollution:</i></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><i>Pollution and nuisance:</i></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</p>

	<p>delivers.</p> <p>Both options C2 and C4 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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	0	+	0	0	+	+	0	0	0	+	0	0	0	0	+	+	0	0
Final Policy Appraisal	+	0	+	0	0	++	+	0	0	0	+	0	0	0	0	+	+	0	0
Summary	<p>The policy should have <u>significant positive impacts</u> for air quality, as should ensure that new development does not give rise to air pollution, and has various requirements that should help to meet Air Quality Action Plan targets, improve air quality and ensure the impacts on sensitive receptors is considered.</p> <p>Policy should have <u>positive impacts</u> on the following objectives: biodiversity, SDNP, water quality, soil quality, health and safety. The policy should ensure that new development does not give rise to various forms of pollution such as noise and light pollution, that can cause harm to various receptors, including people and the various aspects of the natural environment, such as biodiversity, water and land, and 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>																		

<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 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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	0	0	0	0	0	+	0	0	0	++	0	++	+	0	+	0	0	0
Final Policy Appraisal	+	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>

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	0	0	0	0	0	++	+	0	+	0	0	0	0	0	+	0	0	0
Final Policy Appraisal	+	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 improvement of water resources that supply drinking water.</p>																		

<b>DM43 - Sustainable 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	<p>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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	+	+	0	0	++	++	0	++	+	0	+	0	0	+	0	+	0
Final Policy Appraisal	+	+	+	+	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</p>																		

	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.
--	--

<b>DM44 - Energy Efficiency and Renewables</b>																			
Options	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). <b>2) Development management policy on Energy Efficiency and Renewables to guide application of energy policy for development.</b>																		
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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	-?	0	-?	-?	0	-	0	0	++	0	0	0	0	0	0	++	0	+	0
Final Policy Appraisal	-?	0	-?	-?	0	-	0	0	++	0	0	0	0	0	0	++	0	+	0
Summary	<p>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 also actively encourages incorporation of renewables in certain areas as well as encourages all development to achieve greater reductions from fabric efficiency. This should lead to greater reductions in CO2 emissions from energy consumption.</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>																		

<b>DM45 - Community Energy</b>	
Options	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 <b>2) Development management policy on Community Energy to guide application of energy policy for development.</b>																		
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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	-?	0	-?	-?	0	-?	0	0	++	0	0	0	+	0	0	-/+?	0	+	+
Final Policy Appraisal	-?	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 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 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 not considered to have any adverse impacts on these objectives.</p>																		

<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	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.																			
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	+	0	-?	0	0	++	0	0	+	0	0	0	+	0	0	0
Final Policy Appraisal	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>																		

## 5.6 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 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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	-	+	-	-	0	0	0	-	0	+	+	++	+	+	+	+	+

Final Policy Appraisal	-	+	--	+	-	--	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 as well as housing for older people.</p> <p>Although the policy was found to have potential for <u>adverse effects</u> for biodiversity in the short term, it was found to have <u>positive effects</u> for biodiversity and open space in the longer term, as 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>119</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>120</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, 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>																		

<sup>119</sup> Urban Fringe Assessment 2015

<sup>120</sup> Urban Fringe Assessment 2015

## 5.7 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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	+	0	+	- /+	- /+	0	+	0	+	0	+	+	++	+	++	+	+	+
Final Policy Appraisal	+	+	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 biodiversity, open space, heritage, flood risk, water quality, soil quality, climate change adaptation, waste, best use of land, access to services, community safety, equalities and employment objectives. The policy should lead to protection and enhancement of the swift colony and result in increased ecological value of the site through green infrastructure. The policy should lead to protection and improvement of existing on site open space, improve access to children’s play-space within the area and incorporate green infrastructure. The policy should lead to the preservation and enhancement of on-site heritage assets. Retention of open space as well as addition of green infrastructure 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 ensure protection of water through sewerage and phasing requirements. The policy reflects the potential for contamination on site and should result in appropriate remediation. The policy should lead to protection of areas and inclusion of new 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</p>																		

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 SDNP and energy consumption due to lack of site constraints or policy wording relating to these objectives. Impacts on these objectives are largely addressed through implementation of CPP1 policies.

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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	0	+	-/+	-/+	0	0	0	+	0	0	+	++	+	+	+	+	++
Final Policy Appraisal	+	+	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, water quality, climate change adaptation, best use of land, soil quality, 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. Policy should ensure water quality is protected and that any contamination is remediated appropriately. 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. 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>Policy could have <u>adverse impacts</u> on waste reduction as does not present the opportunity to make use of existing buildings on site.</p>																		

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.																		
Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	+	0	+	- /+	- /+	0	-	0	+	0	0	+	++	++	++	+	+	+
Final Policy Appraisal	+	+	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 biodiversity, open space, heritage (streetscape), flood risk, climate change adaptation, water quality, soil quality, community safety, best use of land, equalities and economic development objectives. The policy requires green infrastructure and achievement of BAP objectives; 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 and also sets principles for development which should ensure impact on heritage assets is considered. Reference to incorporating SUDS helps address flood risk on site, and additionally planting of street-trees could help support climate change adaptation. Sewerage infrastructure should maintain water quality and policy should ensure the potential for contamination is considered. 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 following SA recommendation at draft stage, the policy was amended to include a requirement relating to this.</p> <p>The policy could have <u>adverse impacts</u> on waste reduction as redevelopment of some sites will not present an opportunity to make use of existing buildings on site.</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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	+	0	0	- /+	- /+	+	-	0	0	+?	0	++	++	++	+	+	+	++
Final Policy Appraisal	+	+	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 biodiversity, open space, flood risk, climate change adaptation, water quality, soil quality, health, community safety and equalities objectives. The policy should enhance biodiversity and green infrastructure also helping to adapt to climate change, 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. Supporting text refers to incorporating SUDS which should help address any flood risk, also supporting climate change adaptation. 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, and the policy now refers to the need to connect to wastewater, also helping support water quality. The policy supports remediation of a contaminated site, improve soil quality and also protecting water quality. 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.</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 and cycle access which could influence travel choice and also seeks to improve air quality. Following earlier 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, having associated air quality impacts. 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.</p> <p>The policy could have <u>adverse impacts on</u> waste as redevelopment does not present the opportunity to make use of resources or buildings on site.</p> <p>The policy currently has <u>no impacts</u> on some objectives including SDNP and energy</p>																		

	consumption. Impacts on these objectives are largely addressed through implementation of CPP1 policies.
--	---

SSA5 - Madeira Terraces and Drive																			
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 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.</p>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	0	++	+	+	0	0	0	0	0	+	+	0	++	+	+	+	++
Final Policy Appraisal	++	+	0	++	+	+	0	+	0	+	0	+	+	0	++	+	+	+	++
Summary	<p>The policy was found to have <u>significant positive effects</u> for the biodiversity, heritage, access and economic development objectives. The policy should lead to conservation and enhancement of biodiversity, including locally designated sites and internationally rare habitats. 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 other relevant objectives including access to open space, transport, air/noise quality, flood risk, waste, best use of land, climate change adaptation, health, community safety and equalities. 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 having health benefits; 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 improve green infrastructure and shading which can support climate change adaptation; supporting text seeks incorporation of SUDS which should help reduce flood risk and adapt to climate change; the policy should result in improved public realm including lighting and delivery of a</p>																		

	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.
--	---

<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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	+	0	+	+	+	0	0	0	0	0	0	+	0	+	+	+	0	+
Final Policy Appraisal	++	+	0	+	+	+	0	0	0	0	0	0	+	0	+	+	+	0	++
Summary	<p>The policy was found to have <u>significant positive impacts</u> for biodiversity and economic development. The policy should help to enhance and conserve biodiversity, including the LWS and internationally rare habitats. The policy should help to ensure the seafront continues to be a year-round destination with a wide offer and may help to increase footfall to the area, having wider economic benefits.</p> <p>The policy was found to have <u>positive impacts</u> across all other 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.</p>																		

<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.																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+	0	+	+	+	+	+	-	0	+	0	0	+	0	+	+	0	+	++
Final Policy Appraisal	+	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 amended following Proposed Submission stage SA assessment to incorporate wording that was found to have <u>positive impacts</u> on the flood risk objective, as although there is risk of surface and groundwater flooding across the site, the supporting text should ensure that this risk is reduced through SUDS.</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>
--	---

## 5.8 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 F1.

<b>H1 - Housing and Mixed Use Sites</b>	
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>

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	+/0	0	0	- /+/0	+	-/+	0	-/+	-/+	+	0/+	-	+	++	+	+	+	+	- /+/0
Final Policy Appraisal	+/0	0	0	- /+/0	++	-- /+	+	-/+	-/+	+	0/+	-	+	++	++	+	+	+	
Summary	<p>The policy was found to have <u>potential for significant positive impacts</u> for the housing objective; sites allocated could deliver 1,576 dwellings, including sites which will deliver 100% affordable rented accommodation, and larger sites that should deliver 40% affordable housing.</p> <p>On balance, the policy was found to have <u>significant positive impacts</u> for reducing the need to travel and access, as most of the sites allocated had good access to public transport and are considered to be within walking distance from some essential services such as schools, shops and health facilities which can influence travel choice.</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 sites which are likely to deliver housing for certain people with protected characteristics, including young people and those requiring emergency temporary accommodation, and also allocates sites in areas of employment and skills deprivation where opportunities through the Local Employment Scheme could be sought.</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 <u>positive impacts</u> 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 on some sites, which also supports community safety.</p> <p>On balance, the policy was found to have <u>positive impacts</u> for health, due to proximity to services which could support active travel, and through the delivery of housing and opportunities for employment both of which are wider determinants of health. It is recognised that some sites have either air and/or noise quality 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, would not involve a loss of green infrastructure and most are considered to have an overall low flood risk.</p> <p>The policy was found to have <u>positive impacts</u> for water quality, through new policy and supporting requirements that should protect and improve water quality, as well as through the location of sites, the majority of which are located outside a groundwater source protection zone.</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 nor 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.</p> <p>On balance, the policy was found to have <u>mixed impacts</u> (neutral/positive impact) for the biodiversity objective reflecting the fact that most of the sites are previously developed sites with lower potential for ecological interest and development of these sites could result in net gain in biodiversity. It is recognised that one site has a LWS designation and some sites could have ecological interest due to their natural form, or have TPOs in place on parts of the site which would require adequate mitigation to achieve net gains.</p> <p>The policy was found to have <u>mixed impacts</u> (neutral impact/positive impact) for the soil</p>																		

	<p>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.</p> <p>The policy was found to have <u>mixed impacts</u> (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 or making a more positive contribution to its setting.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/negative) for flood risk, as 22 sites have some risk of either surface or groundwater flooding, although it is recognised that only 5 of these were found to be of significant risk by the SFRA requiring consideration by the sequential and exceptions test.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/negative) for the air quality and noise quality objective; the majority of sites are either within the AQMA or suffer from high levels of road/rail noise, which would require mitigation. However some sites do not have air or noise quality issues, and some, including those within the AQMA are unlikely to worsen air or noise quality due to the amounts of development proposed, having a more positive effect.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/negative) for reducing greenhouse gas emissions. The potential impact was based on whether sites were located within/adjacent to a heat cluster opportunity area. Almost half are located within a cluster area and therefore have greater potential to reduce greenhouse gas emissions when compared with those that are not and would need to secure carbon savings through alternative means.</p> <p>The policy was found to have an overall <u>adverse effect</u> for the waste objective; 2/3 of 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 through adaptive re-use.</p> <p>The policy was found to have <u>neutral impacts</u> for the open space objective, reflecting the fact that the majority of sites have no open space designation and therefore will not result in any losses in open space having no impact, with only small losses in designated open space taking place in total. Impacts may become more positive in the longer term if open space provision is secured or improved through development.</p> <p>The policy was found to have <u>neutral impacts</u> for the SDNP, as the majority of sites are within the central built up area or situated within an existing urban context, having a neutral effect.</p>
--	--

## 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 F2.

H2 - Urban Fringe Housing Sites	
Options	In addition to the options discussed under H1, the following options were also considered: <ul 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> </ul>
Summary	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

	<p>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. 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. 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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
Draft Policy Appraisal	-/+	-/+	-/0	-/0	-/+	-/+	-/0	-/0	+	-	-/+/0	-/0	+	++	-/+	-/+	+	+	0
Final Policy Appraisal	-/+	-/+	-/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 930 dwellings, including a proportion of affordable housing and family sized (3+ bedroomed) dwellings.</p> <p>The policy was found to have potential for <u>positive impacts</u> for the objectives for improving water quality through consideration of GSPZs where required, potential to improve soil quality and requirements for waste water infrastructure and sewerage connections; reducing greenhouse gas emissions, through the requirement for development to consider incorporating renewable energy technologies and achieving higher standards of energy efficiency; making the best use of land as will help to deliver housing and retain greenfield functions across non-developed parts of the sites, making good use 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 through improved sustainability standards.</p> <p>The policy was found to have potential for <u>mixed impacts</u> for transport/travel; some of the sites have poor access to public transport and other services and their location on the fringes of the city may influence car ownership and travel choice, however the policy does require sustainable transport infrastructure which could support sustainable travel.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/adverse) for access and health; 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 loss of open space reducing opportunities for activity, although will result in delivery of housing which is a wider determinant of health.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/adverse, leading to neutral/positive in the long term) for biodiversity; 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. In the long term, policy should result in positive/neutral impacts due to the net gain requirements of the policy and the potential for ecological mitigation to become more effective.</p> <p>The policy was found to have <u>mixed impacts</u> (positive/adverse) for open space; some sites contain publically accessible open space and would result in an overall net loss; 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 positive impact also reflects the policy requirements to incorporate green infrastructure.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/neutral) for SDNP; all sites are within</p>																		

	<p>the setting of the SDNP and have landscape sensitivities, becoming more neutral in the longer term as mitigation measures become more effective. Impacts may also become more positive in the longer term reflecting policy requirements to improve access to for design to reflect the character of SDNP.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/neutral) for heritage/archaeology; some sites have heritage/archaeological constraints and could result in adverse impacts, whereas some do not and would have neutral impacts. In addition, consideration of archaeology/heritage within the policy text should also help achieve a neutral impact.</p> <p>The policy was found to have <u>mixed impacts</u> (adverse/positive) for air/noise quality. 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 could potentially deliver more than 100 dwellings and could generate the number of trips which may worsen localised air quality. In addition, 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/positive) for flood risk; some of the sites have a risk of either surface water or groundwater flooding, potentially having an adverse effect, whereas some have no risk which contributes more positively towards this objective. Noted that overall, the SFRA only categorised one site as being of a risk that required sequential/exception test. In addition the policy was found the have <u>mixed</u> (adverse/positive) impacts for climate change adaptation; adverse impacts reflecting flood risk and the loss of land from a natural to more urbanised form, reducing ecosystem services functions of this land; positive impacts reflecting policy requirements relating to incorporating green infrastructure and that c.75% of the urban fringe sites with allocations will remain undeveloped therefore retaining ecosystem services that will become increasingly important in adapting to climate change.</p> <p>The policy was found to have <u>neutral impacts</u> for soil quality; overall the majority of sites are not of high valued soil, and those that are, are not in productive agricultural use. In addition, there is limited opportunity to improve soil quality, e.g. through potential for remediation as most are greenfield in nature. Policy also has neutral impacts for waste, as most sites do not include buildings that could be renovated or reused; and economic development, as will not result in any gains of employment land nor losses in employment land, although it is recognised that some sites currently have existing businesses on site.</p>
--	--

### H3 PBSA sites

<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>

SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Draft Policy Appraisal	0	0	0	-	+	+	-	-	+	0	0	0	+	++	+	- /+	0	0	0
Final Policy Appraisal	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 and transport objectives. 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 location of the sites along a sustainable transport corridor should help to minimise the need to travel by car.</p> <p>The policy was found to have potential for <u>positive effects</u> for the objectives for air/noise quality, greenhouse gas emissions, best use of land, and access. Any reduction in transport movements should have 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 (negative/positive)</u> on the health and climate change adaptation objective. The delivery of PBSA on all 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. Although development would not result in loss or, and could result in gains in green infrastructure, all sites have risk of flooding which could increase with climate change.</p> <p>The policy was found to have potential for <u>mixed (none/positive)</u> impacts on soil quality, due to the potential for contamination and therefore remediation on some sites.</p> <p>The policy was found to have potential for <u>adverse impacts</u> on the water quality, flood risk and waste objectives. Two sites are within a Groundwater Source Protection Zone 1 and therefore development poses a risk to water quality. All sites have a risk of surface water flooding/groundwater flooding and development could be at risk or increase the risk of flooding elsewhere. Redevelopment would not allow for adaptive reuse of existing buildings. No impacts on biodiversity, open space, SDNP, heritage, equalities or economic development are anticipated, either due to lack of the site constraints, location or existing use on site.</p>																		

## 5.9 Other Site Allocations

### E1 New Business and Warehouse Uses

E1 Opportunity site for new business and warehouse uses	
Options	1) Do not allocate new sites for employment uses. Allow market to decide. 2) Allocate new sites for employment uses 3) Bring forward employment allocations as part of Strategic Mixed Use sites

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>																		
SA Objective	Biodiversity	Open space	SDNP	Heritage	Travel	Air/noise	Water	Flood risk	CC mitigation	CC adaptation	Soil	Waste	Best use land	Housing	Accessibility	Health	Crime	Equality	Economics
Draft Policy Appraisal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Final Policy Appraisal	-/+	-	-	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 ad 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.</p> <p>The policy was found to have potential for <u>adverse impacts</u> for the objectives for open space, SDNP, travel, flood risk and climate change adaptation. The site comprises open space which 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 biodiversity and air/noise quality objectives. The site comprises open space or a greenfield nature, and is adjacent to and includes part of two LWS, which could be adversely affected by development, although noted that the supporting text now acknowledges this. 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>																		

## Section 6 Site Appraisals of Site Allocations

### 6.1 Introduction

This section summarises the methodology relating to identification and appraisals of sites at both draft and Proposed Submission stage. Further detail can be found in the Site Allocations Topic Paper, 2019<sup>121</sup>.

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

#### Draft stage City Plan Part 2

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.

Following production of the long-list the following types of sites were excluded:

- Existing allocations in City Plan Part 1
- Sites which had planning permission which had already commenced

The Sustainability Appraisal of options for housing allocations then led to the following types of sites being excluded:

- Sites with capacity for less than 10 units
- Sites not being capable of being delivered in the plan period

Sites considered inappropriate for housing allocation were also excluded, including sites with potential for other uses, such as those for employment or 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. This is detailed fully in the Site Allocations Topic Paper.

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 appraisals was to assess the likely effects of development identified for each site, mainly assessed against any relevant constraints, 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 has potential for positive effects on SA objectives. To assist this process, the SA made use of the information presented in the site profiles<sup>122</sup> which identified constraints and opportunities, as well as other publically available GIS data or knowledge gained through planning applications.

The SA site appraisals were not used as part of the process to discount or reject sites, for example, where a site was 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. The site appraisals were used to identify any possible mitigation that may be required, as well as to form the basis of the appraisal of policy H1.

**Table 6.1 Proposed H1 site allocations assessed at draft Plan stage**

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

<sup>121</sup> See [Topic Paper on CPP2 Background Studies Page](#)

<sup>122</sup> Site Profiles are located within the Site Allocations Topic Paper

251-253 Preston Road, Brighton, BN1 6SE
Eastergate Road Garages, Moulsecoomb, Brighton, BN2 4PB
Land between Manchester Street/Charles Street, Brighton, BN2 1TF
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 Droveaway, 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, Portslade (Site SP7 in JAAP Policy CA3)

A further stage of review and refinement of sites took place following the SA site appraisals based on available information including the likelihood of sites coming forward within the plan period. This led to three sites being excluded as shown in table 6.2.

**Table 6.2 Rejected sites following further review (draft stage)**

Site name	Reason for rejection
Kings School Site, Portslade	Deliverability within plan period
Land rear of 62-68 Beaconsfield Road, Brighton	Deliverability within plan period
Land west of Homeleigh, Patcham	Availability within plan period due to existing use

## Proposed Submission stage City Plan Part 2

Additional omission sites were put forward as potential housing allocations during the consultation on draft City Plan Part 2, as shown in Table 6.3. These sites underwent the sieving process as per the draft stage in order to determine whether they were suitable as a potential allocation.

**Table 6.3 Omission H1 sites**

Site name	Potential use	Suitable for allocation
Dolphin House, Manchester Street, Brighton	C3 +B1	Sites in active B1 use not put forward for allocation based on the Housing and Employment Land Study.
Royal Sussex County Hospital Outpatients department, Eastern Road, Brighton	C3	Yes.
Royal Mail Sorting Office, 88 Denmark Villas, Hove	C3	Yes.
12 Richmond Parade	C3	Put forward for 7 units by representor. Too small for allocation.

Omission sites considered suitable for allocation then underwent site appraisal against the Sustainability Appraisal Framework.

At Proposed Submission stage, all existing H1 site allocations site profiles and SA site appraisals were reviewed and updated to take into consideration any new or emerging evidence, as well as representations received on the draft City Plan Part 2. This included:

- Progress of planning applications/consents/commencements
- Amendments to site capacity/density
- Amendments to timescale for delivery
- Availability
- Evidence from the SFRA including surface water and groundwater flood risk
- Evidence from the Sequential/Exceptions test
- Information about Groundwater Source Protection Zones
- Proximity to Local Nature Reserves
- Local Wildlife Sites Study including LWS candidate and new sites

Following this review, some sites were no longer considered suitable for H1 allocation, as shown in Table 6.4.

**Table 6.4 Rejected sites following further review (Proposed Submission stage)**

Site name	Reason for rejection
46-54 Old London Road, Patcham	Not available in plan period due to existing use
Baptist Tabernacle, Montpelier Place, Brighton	Development commenced
Selsfield Drive Housing Office, Brighton	Development commenced
The Astoria, Brighton,	Development commenced
270 Old Shoreham Road, Hove	Not available due to proposed employment uses
Downsman Pub, Hangleton	Development commenced
251-253 Preston Road, Brighton	Development commenced
Former Brewery site, South Street, Portslade	Development commenced

The individual SA site assessments for all remaining H1 sites allocated within Tables 5 and Table 6 of Policy H1 formed the basis of the assessment for policy H1, in addition to the policy itself. Site assessments for all allocated H1 sites can be found in Appendix F1. Site assessments for all rejected sites can be found in Appendix F6.

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

### Draft stage City Plan Part 2

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.

As described under 6.2, certain SHLAA sites were excluded as potential urban fringe housing allocations based on the number of units the site could accommodate, in accordance with the Sustainability Appraisal of options which recommended that sites providing less than 10 units should not be allocated:

- Site 36 Lawns Memorial Grounds
- Site 41 Land at Wanderdown Road Open Space
- Site 43 Land to the rear of Longhill Road

Following this stage, site appraisals were carried out using the Sites Sustainability Appraisal Framework on the sites identified in table 6.5 in order to identify issues and opportunities, however was not used as a way of discounting sites, as broad suitability had been determined through the higher level urban fringe assessments.

**Table 6.5 Proposed urban fringe site allocations assessed at draft stage**

*(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	
33	Land north of Warren Road (Ingleside stables)
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,

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

Further consideration 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 6.6. Site assessments for these rejected sites can be found in Appendix F6.

**Table 6.6 Rejected urban fringe sites following further review**

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

### Proposed Submission stage City Plan Part 2

No omission urban fringe sites were put forward for consideration during consultation on the draft stage City Plan Part 2.

At Proposed Submission stage, all H2 site allocations site profiles and SA site appraisals were reviewed and updated to take into consideration any new or emerging evidence, as well as representations received on the draft City Plan Part 2. This included:

- Progress of planning applications/consents/commencements
- Amendments to site capacity/density
- Amendments to timescale for delivery
- Availability
- Technical evidence on viability/deliverability
- Evidence from the SFRA including surface water and groundwater flood risk
- Evidence from the Sequential/Exceptions test
- Information on Groundwater Source Protection Zones
- Proximity to Local Nature Reserves
- Local Wildlife Sites Study including LWS candidate and new sites

All sites were still considered suitable for H2 allocation at Proposed Submission stage. Following this review, some site clusters were amended to reflect any planning consents. Table 6.7 includes the site allocations set out in Policy H2 Table 7.

**Table 6.7 Proposed Submission Stage H2 Site Allocations**

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	Land off Overdown Rise, Mile Oak.
5	
5a	
11	Benfield Valley
12	
16	Land at and adjoining Horsdean Recreation Ground, Patcham

Site number	Site name
17	Land at Ladies Mile, Carden Avenue
21	Land to northeast of Coldean Lane
21a	Land north of Varley Halls, Coldean Lane
30	Land at and Adjoining Brighton Racecourse
32	Land at South Downs Riding School and Reservoir Site
32a	
33	Land north of Warren Road (Ingleside stables)
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	
48b	
48c	
50	Land west of Falmer Avenue, Saltdean

Site 6, previously within site cluster “4, 4a, 4b, 5, 5a, 6: Land at Mile Oak Road” and site 21c, previously within site cluster “21, 21a, 21c: Land to northeast of Coldean Lane/Land north of Varley Halls/Land south of Varley Halls” are no longer included within the site clusters due to their existing use as allotments and the intention to retain them in this use.

The individual site assessments for all H2 sites allocated formed the basis of the assessment for policy H2, in addition to the policy itself, as well as policy SA7 – Benfield Valley. Site assessments for all allocated H2 sites/site clusters can be found in Appendix F2.

## 6.4 Purpose Built Student Accommodation (H3)

### Draft stage City Plan Part 2

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 and the others were not considered to be reasonable alternatives due to:

- Site already allocated in CPP1 for alternative uses
- Site safeguarded for alternative use in Waste & Minerals Local Plan

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. Again, as described under 6.2 and 6.3, this was not used to discount sites on sustainability grounds, but identified the types of impacts and mitigation that would be required.

**Table 6.8 Proposed PBSA sites at draft stage**

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

## Proposed Submission stage City Plan Part 2

Three omission sites were put forward as potential PBSA allocations during the consultation on draft City Plan Part 2 as shown in Table 6.9.

**Table 6.9 Omission H3 sites**

Site name	Potential use	Suitable for allocation
Enterprise Point, Melbourne Street	PBSA	No; contrary to CP3.4; site already allocated for employment-led mixed use development.
27-31 Church Street, Brighton	PBSA	Proposed to be allocated as a residential-led mixed use allocation in H1; however assess for potential against SA Framework.
45-47 Hollingdean Road, Brighton	PBSA	Yes

Omission sites considered suitable for allocation then underwent site appraisal against the Sustainability Appraisal Framework. This included 27-31 Church Street and 45-47 Hollingdean Road; however 27-31 Church Street was subsequently rejected for PBSA due to it being a proposed H1 allocation and existing SHLAA site and therefore falling contrary to CP21.

At Proposed Submission stage, all H3 site profiles and SA site appraisals were reviewed and updated to take into consideration any new or emerging evidence, as well as representations received on the draft City Plan Part 2. This included:

- Progress of planning applications/consents
- Amendments to site capacity/density
- Amendments to timescale for delivery
- Availability
- Evidence from the SFRA including surface water and groundwater flood risk
- Evidence from the Sequential/Exceptions test
- Information on Groundwater Source Protection Zones
- Proximity to Local Nature Reserves
- Local Wildlife Sites Study including LWS candidate and new sites

Following this review, all sites were still considered suitable for H3 allocation.

The individual SA site assessments for H3 sites allocated within Table 8 of Policy H3 formed the basis of the assessment for policy H3, in addition to the policy itself. Site assessments for all allocated H3 sites can be found in Appendix F3. Site assessments for all rejected sites can be found in Appendix F6.

## 6.5 Strategic Site Allocations (SSA1-SSA7)

### Draft stage City Plan Part 2

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 the SA assessments for policies SSA1 to SSA7.

**Table 6.10 Proposed Strategic Site Allocations Draft Stage**

Site name and address
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)

**Proposed Submission stage City Plan Part 2**

One omission site was put forward as potential strategic allocation during the consultation on draft City Plan Part 2 as shown in Table 6.11.

**Table 6.11 Omission Strategic Allocation**

Site name	Potential use	Suitable for allocation
Brighton Racecourse	Mixed use strategic allocation including residential, hotel and commercial uses.	Assessment through the site profile procedure found the site not to be suitable due to site constraints, including the Schedule Ancient Monument and uncertainty over the development.

The proposed site allocation was assessed through the SA site assessment process but was subsequently rejected on the grounds of constraints and uncertainties.

At Proposed Submission stage, all strategic site allocation site profiles and SA site appraisals were reviewed and updated to take into consideration any new or emerging evidence, as well as representations received on the draft City Plan Part 2. This included:

- Progress of planning applications
- Amendments to site capacity/density
- Amendments to timescale for delivery
- Availability
- Evidence from the SFRA including surface water and groundwater flood risk
- Evidence from the Sequential/Exceptions test
- Information on Groundwater Source Protection Zones
- Proximity to Local Nature Reserves
- Local Wildlife Sites Study including LWS candidate and new sites

Following this review, all existing sites were still considered suitable as strategic allocations.

The individual SA site assessments for strategic site allocations formed the basis of the assessment for each policy SSA1 to SSA7, in addition to any requirements within the policy itself. Site assessments for all allocated sites can be found in Appendix F4. Site assessment for the rejected site can be found in Appendix F6.

**6.6 Opportunity area for new business and warehouse uses (E1)****Draft Stage City Plan Part 2**

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

The SA of options for employment site allocations found the option of bringing forward employment allocations as part of strategic mixed use sites would be the preferred option; despite this one site was proposed to be allocated as shown in table 6.12.

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 6.12 Proposed employment/warehouse allocation Draft Stage**

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

**Proposed Submission Stage City Plan Part 2**

No further omission sites were put forward for employment and warehouse uses during consultation.

At Proposed Submission stage, the site profile and SA site appraisal for the E1 site was reviewed and updated to take into consideration any new or emerging evidence, as well as representations received on the draft City Plan Part 2. This included:

- Evidence from the SFRA including surface water and groundwater flood risk
- Evidence from the Sequential/Exceptions test
- Information on Groundwater Source Protection Zones
- Proximity to Local Nature Reserves
- Local Wildlife Sites Study including LWS candidate and new sites

Following this review, the site was still considered suitable for E1 allocation.

The individual SA site assessment for the site allocated within policy E1 formed the basis of the assessment for policy E1, in addition to the policy itself. Site assessments for the allocated site can be found in Appendix F4. There were no rejected sites.

Further and more detailed information on the site allocation process can also 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 other CPP2 policies where these are considered to provide mitigation.

### 7.2 Mitigation

The requirement for mitigation is discussed within individual policy assessments within Appendix G. Table 7.1 summarises the mitigation for the Plan as a whole and is not linked to individual policies.

**Table 7.1 Potential impact and mitigation required**

SA Objectives	Impact	Mitigation
Biodiversity	Development on certain sites could lead to ecological losses on sites of nature conservation importance or impact upon their designation.	<ul style="list-style-type: none"> <li>• CPP1 CP10 provides for protection of biodiversity and requires net gains to be achieved.</li> <li>• CPP2 DM37 requires all development to achieve a net gain in biodiversity.</li> <li>• CPP2 DM37 sets clear criteria which must be met by development likely to have effects on sites of nature conservation importance.</li> <li>• CPP2 DM37 only allows development on designated sites provided the objectives of the designation are not affected.</li> <li>• CPP2 DM37 seeks to conserve and enhance biodiversity features.</li> <li>• CPP2 DM37 should ensure that development avoids harm to green infrastructure and nature conservation features.</li> <li>• CPP1 DM37 requires development to enhance protected species, habitats, ancient woodland, trees, marine and coastal biodiversity and geodiversity</li> <li>• H2 requires development on urban fringe sites to mitigate impacts and provide net gains.</li> </ul>
	Development could increase recreational pressure on nearby sites of nature conservation importance.	
	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 retention of some open space on site if losses occur.</li> <li>• CP16 also requires development to provide and improve open space.</li> <li>• H2 requires development on urban fringe sites to secure additional or improved public 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</li> </ul>

SA Objectives	Impact	Mitigation
	<p>New employment floorspace, particularly within existing industrial estates could have landscape impacts.</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 landscape.</p> <p>Development on some urban fringe sites could have adverse landscape impacts.</p>	<p>SDNP contributes towards protecting the special qualities of the landscape.</p> <ul style="list-style-type: none"> <li>• CPP1 CP15 and CPP2 DM18 should ensure design is of a high quality.</li> <li>• CPP2 DM19 requires development to take account of CPP1 SA4 and SA5</li> <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>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>• CPP1 CP15 seeks to conserve and enhance the historic environment</li> <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 assets or settings.</li> <li>• CPP1 CP12 and CP13 should 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> <li>• CPP2 DM34 requires consideration of</li> </ul>

SA Objectives	Impact	Mitigation
		<p>impacts on traffic flows and city centre parking provision.</p> <ul style="list-style-type: none"> <li>• Strategic site allocation policies all require sustainable transport infrastructure improvements.</li> </ul>
Air/noise quality	<p>New employment floorspace could increase transport movements and impact upon air quality.</p> <p>Development within the seafront could increase attractiveness of the area and result in increased traffic and congestions and associated problems.</p> <p>New housing development could increase transport movements having air quality impacts, particularly larger sites or sites within the AQMA.</p> <p>Some sites are situated in areas of high road/rail noise.</p> <p>Certain types of renewable energy technologies can have adverse impacts on noise quality.</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 major developments within AQMAs to submit TA and AQA.</li> <li>• CPP2 DM35 requires larger developments to submit a TA which also considers cumulative impacts from other developments</li> <li>• CPP2 DM35 requires development to help minimise the use of private car.</li> <li>• CPP1 CP8 requires development to address air quality.</li> <li>• CPP2 DM40 should ensure that any noise impacts arising from development are acceptable and seeks to alleviate noise issues through design.</li> </ul>
Water Quality	<p>Conversion of C3 house into HMO could result in increases in resource consumption compared to individual dwellings</p> <p>Development within GSPZ could have adverse impacts upon water quality</p>	<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 and quantity is protected.</li> <li>• Some SSA policies include requirements to protect water quality.</li> <li>• Majority of H1 housing allocations located outside GSPZ.</li> </ul>
Flood Risk	<p>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.</p> <p>Transport interchanges could result in urbanisation of land and increase risk of surface water flooding/run-off.</p>	<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> <li>• Majority of site allocations assessed as having low risk of flooding.</li> </ul>

<b>SA Objectives</b>	<b>Impact</b>	<b>Mitigation</b>
Greenhouse Gas emissions	Conversion of C3 house into HMO could result in increases in resource consumption compared to individual dwellings	<ul style="list-style-type: none"> <li>• CPP2 DM44 requires all development including conversions and changes of use to achieve certain energy efficiency standards</li> <li>• CPP1 CP8 requires certain standards of energy efficiency to be achieved.</li> </ul>
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 safeguards green infrastructure and is included within schemes</li> <li>• CPP2 DM37 requires net gains in biodiversity to be achieved</li> <li>• CPP2 DM22 requires landscaping to be incorporated within the scheme.</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> <li>• Majority of site allocations assessed as having low risk of flooding.</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 DM40 and DM41 should minimise this risk of pollution of the environment.</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> <li>• DM11 requires new employment floorspace to be flexible to allow for changing needs, helping to reduce future waste</li> </ul>
	Redevelopment on certain sites will involve demolition and production waste.	
Best use of land	Protection of amenity could prevent certain types of development from being acceptable including higher density schemes.	<ul style="list-style-type: none"> <li>• CPP1 DA policies indicate locations where higher density development would be acceptable;</li> <li>• CPP12 CP12 Urban Design sets out the 9 areas with potential for taller developments</li> <li>• CP14 Housing Density provides policy guidance on expected densities.</li> </ul>
Access	Housing development on some of the urban fringe sites does not have good access to certain	<ul style="list-style-type: none"> <li>• H2 requires development to consider the need for community facilities.</li> <li>• DM9 sets the framework for provision of</li> </ul>

SA Objectives	Impact	Mitigation
	services.	new facilities and requires these to be close to the community they serve
Health	<p>Maximising development on site to make the most efficient use of land could result in increased amenity impacts.</p> <p>New development within areas of high road/rail noise could result in occupier amenity impacts.</p> <p>Some urban fringe sites may result in loss of open space which could impact upon physical and mental health and well-being.</p>	<ul style="list-style-type: none"> <li>• CPP2 DM20 should ensure that impacts on amenity are acceptable.</li> <li>• CPP2 DM40 should ensure developments are designed to alleviate any existing problems.</li> <li>• SSA sites requirements development to take into consideration and address locational impacts such as noise</li> <li>• CPP2 DM40 should ensure that any noise impacts arising from development are acceptable and seeks to alleviate noise issues through design.</li> <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> <li>• H2 may result in improved access to the SDNP in some locations which could be used for recreation purposes.</li> <li>• DM43 adds further protection to some green spaces</li> </ul>
Community safety	Some sites are located within areas of high crime deprivation	<ul style="list-style-type: none"> <li>• CPP1 CP12 requires development to design out crime</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>• CPP2 E1 allocates land for employment uses.</li> <li>• DM11 requires new employment floorspace to be flexible.</li> <li>• CPP1 CP2 and CP3 provides for protection of some employment uses.</li> </ul>

## **Section 8 Cumulative and Synergistic 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 certain policies reduce the risk of adverse impacts of others.

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 and helps to highlight potential significant effects. This discussion also considers how City Plan Part 1 policies influence the cumulative/synergistic results.

**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	+	+	++	+	+	+	++
DM13	0	0	0	+	+	+	0	0	0	0	0	0	+	+	++	+	+	+	+
DM14	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
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	+	+
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	+
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	+	+	+	+	+
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
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	+
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	+	+	+	+	++	+	++	+	+	+
SSA2	+	+	0	+	-/+	-/+	+	0	0	+	+	-	+	++	+	+	+	+	++
SSA3	+	+	0	+	-/+	-/+	+	+	0	+	+	-	+	++	++	++	+	+	+
SSA4	+	+	0	0	-/+	-/+	+	+	0	+	+	-	++	++	++	+	+	+	++
SSA5	++	+	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
H2	-/+	-/+	-/0	-/0	-/+	-/+	+	-/+	+	-/+	0	0	+	++	-/+	-/+	+	+	0
H3	0	0	0	0	++	+	-	-	+	-/+	0/ +	--	+	++	+	-/+	0	0	0
E1	-/+	-	-	0	-	-/+?	0	-	0	-	0	+	+	0	0	+	0	+?	++
All	-/+	+	-/0	-/+	-/+	-/+	+/0	-/+	+/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	-/+	-/+	-/+	-/0	-/+	+/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 biodiversity. Whilst it is recognised that DM37 sets the framework to enable development on designated ecological sites to be permitted, the criteria is considered to be strong, reflecting the importance of each type of site, and requires an appropriate level of assessment to identify impacts (such as HRA/EIA). In addition, for all sites, development will only be permitted provided the objectives of the designation are not undermined, that funded management plans are in place and that losses can be mitigated to achieve net gains. The other requirements of DM37, in addition to DM22, should ensure existing biodiversity features are enhanced, should ensure developments contribute to the green network and should result in biodiversity net gains. 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 should have positive impacts for biodiversity, such as H1, either due to the lack of biodiversity on the majority of sites and the opportunities for enhancement that redevelopment will present, or through specific policy requirements such as with SSA1, SSA2, SSA3, SSA5, SSA4, SSA5, SSA6 and SSA7. H2 could have mixed impacts for biodiversity, particularly in the short term and will depend on the ecology on-site and how any potential adverse effects are mitigated, although it is recognised the policy identifies this as a specific constraint and consideration.

### 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, protected and enhanced, that any potential adverse effects are appropriately mitigated or compensated, and should lead to net gains overall, particularly in combination with CPP1 policy CP10 Biodiversity. In addition, the full Habitats Regulations Assessment undertaken on CPP2 has concluded that CPP2, either alone or in combination with other plans, would not result in adverse effects that would affect the integrity of the Ashdown Forest SAC/SPA, and the screening undertaken screened out the likelihood of significant effects on other SACs/SPAs within the wider areas.

### 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 some provision of open spaces, such as through DM4 Housing for Older People, as well as protection of existing open space, particularly those which have an ecological designation, through DM37, and those which have heritage designations, through DM28, DM29, DM30 and DM32. DM19 should also help to ensure that any new open space provided is usable across all sites.

### 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 will be some individual on-site losses. Although H2 will result in some losses in open space, not all sites are publicly 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 strategic policy CP16 Open Space. The DM and Site Allocations policy requirements in combination should result in provision of new, usable and publicly 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 DM24, DM25, DM34, and DM40 include specific references to protect the landscape through aspects of design, including the dark skies reserve, 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 more adverse for landscape, where there is an impact. The majority of the strategic mixed use site allocations and H1 and H3 allocations are unlikely to have any impact upon this objective, mainly due to their location within the city, or their existing urban context. However, E1, 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 and in combination with CPP1 policy SA5. 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 through vacancy 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 impacts, including adverse impacts, due to on-site or adjacent heritage constraints and the lack of specific requirements within each individual policy.

#### 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 on some sites. 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 new services, including health, retail or community 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, seeks to reduce private car use through the delivery of infrastructure to support and encourage sustainable modes of transport, and generally allocates sites which predominantly have good access to most services as well as public transport provision. CPP1 policy CP9 also contributes towards this objective through the promotion of sustainable transport. 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 pressure on the water resource.

##### Site allocation policies

Overall, the cumulative impact of the site allocations policies is positive for water quality, where there is an impact. Some of the strategic mixed use site allocations have a positive effect due to requirements relating to water infrastructure; and include a reference to protecting sensitive water

resources where relevant to the allocation. Both H1 and H2 also include specific considerations relating to water infrastructure and GSPZ.

#### 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 zones are protected, through on-site considerations and that development does not lead to the pollution of these resources, and through requirements relating to waste-water infrastructure. 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 to 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 and shading.

##### 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, although the majority of those with a risk have a low risk. 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. The strategic site allocations and H1 sites are considered to have more positive effect for this objective, as overall will provide opportunities to increase provision; when compared with SA7 and H2 as these 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 minimised 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 that contribute towards climate change

##### 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, supporting the council's ambition to become carbon neutral. In addition, DM45 and DM46 should

also help to reduce greenhouse gas emissions through support for community energy and integrated heat networks. References to circular economy principles, such as in DM18 further support carbon savings. The transport policies should also help to minimise transport based carbon emissions.

#### Site allocation policies

Overall the cumulative impacts of the site allocations policies should be positive for reducing carbon emissions where there is an impact. 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, and were therefore found to have no impact. H1 was 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. H2 includes specific requirements relating energy efficiency and renewable energy, linking to DM44 and is therefore positive.

#### 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 all types of development including 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; with strategic sites where this is potentially an issue now referring to this within the policy.

#### 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 a better use of existing resources and prevents production of waste. Policy DM11 New Business Floorspace should help to reduce waste through requirements for development to be flexible and to allow for sub-division. Some adverse impacts are associated with types of development which may result in demolition. References to circular economy principles further support waste minimisation.

### Site allocation policies

Overall the cumulative impacts of the site allocations policies is considered to be mixed. 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. 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; some negative impacts will arise where redevelopment will result in demolition. Impacts for H1 and H3 site allocations are found to be adverse overall, as most will result in demolition and redevelopment of the site.

### 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, and will help bring some vacant sites back into use and help make better use of existing sites. In the majority of cases, the minimum density targets outlined within CPP1 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, and will help make better use of existing land in the city.

## 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 including affordable housing at genuinely affordable rents; 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 stock. In addition, the retail policies DM12 and DM13 both allow change of use to residential within defined shopping centres in certain situations. 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/site clusters 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 Accommodation, 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 air and water quality, with improvements to air quality supporting health in particular. 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 allocation 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, including health provision, 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 particularly in combination with CPP1 policy CP18 A Healthy City. The DM and Site Allocations policy requirements should combine to help deliver numerous health outcomes 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 DM12 to DM15 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 DM33 to DM36 should ensure that developments are safe, in terms of road safety.

### Site allocation policies

Overall, the cumulative impact of the site allocations policies 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 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, particularly in combination with the requirements of CPP1 CP12 Urban Design. 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, including a proportion which is genuinely affordable. 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. Policies DM9 and DM10 both provide employment opportunities and can support vitality and vibrancy in neighbourhoods and other areas. The retail policies DM12, DM13, DM14, and DM15 should ensure there is a balanced mix of uses in retail centres or other special areas, 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, 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 allocation policies 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, 11 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 any significant effects on the local economy.

#### CPP2 overall

Overall, the cumulative effect of CPP2 should be **significantly positive** for economic development, particularly in combination with CPP1 policies CP2 and CP3 which protects certain areas and uses in the city. 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 are more mixed overall particularly for some of the environmental objectives. Some sites have the potential to have multiple site-based environmental 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 avoids, reduces and addressed the likelihood of potential adverse effects arising from development on individual sites allocated across the site allocation policies, or from development coming forward on unallocated sites within the city, having a combined cumulative positive or neutral effect overall. In addition, when considered against the wider planning framework of City Plan Part 1, effects should be more positive overall.

## Section 9 How the SA has influenced CPP2

### 9.1 Introduction

This section summarises how the SA process has fed into the preparation of the CPP2 at both draft and Proposed Submission stages.

### 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 can be found in Section 5.

### 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 tables indicate where the SA made a recommendation to amend the policy at draft and Proposed Submission stages, and the officer response. All policies were reappraised following any changes and the SA revised where relevant.

**Table 9.1 Recommended Changes to Policies at Draft City Plan Part 2 Stage**

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 people with protected characteristics as defined by the Equalities Act 2010.</u> "	Additional text added as recommended (nb: deleted at Proposed Submission stage)

Policy	SA Recommendation	Officer Response
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 and quantity status.” Or “ <u>There is a need to improve groundwater status</u> ”.	Additional text added as recommended.
DM43 Sustainable Drainage	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> ... This would further strengthen the positive impacts on SA objective 4.	Policy text amended as suggested.

Policy	SA Recommendation	Officer Response
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 “The developer will enter into a training place agreement to secure training for local people”.</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
SSA2 Combined Engineering Depot	<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>	Added as suggested
SSA3 Land at Lyon Close	<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>	Added as suggested
SSA4 Sackville Trading Estate & Coalyard	<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 implementation of the council’s Air Quality Action Plan. Ensure new development proposals take into</p>	<p>Added as suggested.</p> <p>Change not implemented. Requirements of emerging CPP2 policy on pollution control, as well as CPP1 CP9 Sustainable Transport should address air quality issues.</p>

Policy	SA Recommendation	Officer Response
	<p>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>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>
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> </ul>	All added as suggested.

Policy	SA Recommendation	Officer Response
	<ul style="list-style-type: none"> <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>	Amended as suggested.

**Table 9.2 Recommended Changes to Policies at Proposed Submission Stage**

Policy	SA Recommendation	Officer Response
DM37 Green Infrastructure	Final paragraph could be amended to ensure that the requirements relating to mitigation and achieving net gains applies to all sites.	Added as suggested.
SSA3 Land at Lyon Close	The supporting text could refer to opportunities to incorporate SUDS within the landscaping improvements to help reduce existing flood risk on site, also supporting climate change adaptation. Also, supporting text could include a link to DM43. SFRA Level 2 suggested SUDS such as swales and other green infrastructure such as green roofs would support drainage control.	Added as suggested.  Added as suggested
SSA4 Sackville Trading Estate & Coalyard	The supporting text could refer to opportunities to incorporate SUDS, such as within the public square and public realm, to help reduce existing flood risk on site, also supporting climate change adaptation. Also, supporting text could include a link to DM43. SFRA Level 2 suggested SUDS such as swales and other green infrastructure such as green roofs would support drainage control although would need to be compatible with the GSPZ.	Added as suggested.  Added as suggested.
SSA5 Madeira Terraces and Drive	Supporting text could include references to adjacent LWS to strengthen requirements.  Supporting text could refer to opportunities to incorporate SUDS, such as within the landscaping solutions, which would help reduce existing flood risk across the site, also supporting climate change adaptation. Also, supporting text could include a link to DM43.	Added as suggested  Added as suggested
SSA7 Land adjacent to AMEX stadium	The supporting text could refer to opportunities to incorporate SUDS, such as within part of landscaping solutions, to help reduce existing flood risk on site, also supporting climate change adaptation.	Added as suggested.

<b>Policy</b>	<b>SA Recommendation</b>	<b>Officer Response</b>
	Also, supporting text could include a link to DM43. SUDS such as swales and other green infrastructure such as green roofs would support drainage control although would need to be compatible with the GSPZ.	Added as suggested.
H2 Housing on Urban Fringe	Table should be updated to reflect any new designations.  Suggested to include a link to DM44, with regards to carbon emissions reductions sought on urban fringe sites.	Amended as suggested  Added as suggested

## 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 indicators were proposed to monitor the effects of CPP1, and as CPP2 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 plan documents.

An Annual Monitoring Report will be produced to monitor the implementation of the City Plan which will include monitoring 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.
	Percentage of residential units delivered that are car-free
	CO2 emissions per capita from road transport (kt)
	6) Air/noise quality
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

<b>SA Objective / Topic Area</b>	<b>Indicator</b>
changing climate	such as green walls/roofs.
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

SA Objective / Topic Area	Indicator
	income 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

## Appendix A Review of Plans, Programmes and Guidance

A full review of Plans, Policies and Guidance documents were reviewed at Scoping Stage 2016. This has been updated in December 2018 with any additional and emerging relevant guidance. Some documents cut across several themes and so are listed more than once. Documents added since draft stage are underlined.

<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)
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)
<u>NPPF (2019)</u>
<u>25 Year Environment Plan (DEFRA) 2018</u>
<u>Local Wildlife Sites Review 2018</u>
<u>CPP2 HRA 2018 (screening)</u>
<u>CPP2 HRA 2018 (Ashdown Forest Air Quality Impact Assessment)</u>
<u>Environment Bill (2019)</u>

<b>Water Quality &amp; Resources</b>
Water Framework Directive (2000/60/EC)
A Blueprint to safeguard Europe’s Water Resources (EC, 2012)
Bathing Water Directive (2006/7/EC) 2006
Water for Life (White Paper) DEFRA Dec 2011
Future water: the Government's water strategy for England DEFRA 2011
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
<u>River Basin Management Plan for the South East. Environment Agency 2016</u>
<u>Water Resources Management Plan 2020-2025 (2018) Southern Water</u>
<u>NPPF (2019)</u>
<u>25 Year Environment Plan (DEFRA) 2018</u>
<u>Environment Bill (2019)</u>

<b>Soil, Waste and Land Resources</b>
Waste Framework Directive (2008/98/EC)
European Thematic Strategy for Soil Protection 2006
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 and Addendum 2015
East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan – Sites Plan (2017)
<u>NPPF (2019)</u>
<u>25 Year Environment Plan (DEFRA) 2018</u>
<u>Environment Bill (2019)</u>

<b>Air and Noise Quality</b>
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)
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
<u>Clean Growth Strategy (DBEIS) 2017</u>
<u>NPPF (2019)</u>
<u>25 Year Environment Plan (DEFRA) 2018</u>
<u>Air Quality: Clean Air Strategy (DEFRA) 2019</u>
<u>Environment Bill (2019)</u>

<b>Climate Change and Flooding</b>
Kyoto Protocol to the United Nations Framework Convention on Climate Change Dec-97
Renewable Energy Directive 2009/28/ec
Energy Efficiency Directive (2012/27/EU)
EU Flood Risk Directive (2007/60/EC)
Energy Act 2011
Renewable Energy Strategy DECC 2009
Climate Change Act HMSO 2008
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)
The Flood and Water Management Act: 2010 HMSO 2010
The National Flood and Coastal Erosion Risk Management Strategy for England (Defra and Environment Agency, 2011)
City Sustainability Action Plan (2015)
Sustainable Community Strategy (2014)
Climate Change Strategy BHCC 2011
Renewable & Sustainable Energy Study AECOM 2012
Shoreline Management Plan – Beachy Head to Selsey Bill First Review South Downs Coastal Group 2006
Brighton Marina to River Adur Strategy 2012

Brighton Marina to Saltdean Strategy 2001
Brighton & Hove Strategic Flood Risk Assessment update JBA Consulting 2012
BH Surface Water Management Plan (2013)
BHCC Flood Risk Management Strategy 2015
<u>Clean Growth Strategy (DBEIS) 2017</u>
<u>NPPF (2019)</u>
<u>25 Year Environment Plan (DEFRA) 2018</u>
<u>SFRA 2018</u>
<u>UK Climate Projections 2018</u>
<u>Sequential and Exceptions Test 2019</u>
<u>Environment Bill (2019)</u>

<b>Cultural Heritage, Landscape and Open Space</b>
European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)
The European Landscape Convention (2000)
National Parks & Countryside Act 1949 and Environment Act 1990
Government's Statement on the Historic Environment for England (HM Gov, 2010)
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
Green Network for Brighton & Hove 2009
Public Rights of Way Improvement Plan 2007-2017
Indoor Sports Facilities Plan 2012-2022
<u>Food Strategy &amp; Action Plan (2018-2023)</u>
<u>The Heritage Statement DCMS (2017)</u>
<u>NPPF (2019)</u>
<u>25 Year Environment Plan (DEFRA) 2018</u>
<u>Joint Health &amp; Wellbeing Strategy 2019</u>

<b>Population, Health and Inequalities</b>
European Health Strategy 'Together for Health: A Strategic Approach for the EU 2008- 2013' (2007)
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
Children & Young People's Plan 2009-2012 BHCC 2009
Reducing Inequality Review OCSI and Educe Ltd for BHCC 2008
<u>Annual Report of the Director of Public Health: Look Inequality (2015) (and updates 2016, 2017, 2018)</u>
<u>Joint Strategic Needs Assessment 2017 and updates</u>
<u>Prevention is Better than Cure: our vision to help you all live well for longer (DH) (2018)</u>

<u>NPPF 2019</u>
<u>Food Strategy and Action Plan 2018-2023 Brighton &amp; Hove Food Partnership</u>
<u>Joint Health &amp; Wellbeing Strategy 2019</u>

<b>Housing</b>
Housing & Planning Act 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)
<u>Clean Growth Strategy (DBEIS) 2017</u>
<u>Fixing our broken housing market (white paper) 2017</u>
<u>NPPF 2019</u>
<u>Older People's Accommodation Study 2019</u>
<u>Build to Rent Study 2019</u>

<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)
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
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
<u>Industrial Strategy (DBEIS) 2017</u>
<u>Clean Growth Strategy (DBEIS) 2017</u>
<u>NPPF 2019</u>
<u>Visitor Accommodation Update Study 2017</u>
<u>Shoreham Harbour Joint Area Action Plan 2019</u>
<u>Coast to Capital Strategic Economic Plan 2018-2030</u>
<u>Economic Strategy for Brighton &amp; Hove (2019)</u>

## Appendix B SA Framework, Indicators and Baseline Information

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
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> <li>• Improve links between existing and/or new biodiversity and the</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</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Castle Hill SAC</a>: 33% favourable, 65% unfavourable recovering (2009-2017)</li> <li>• <a href="#">Marina to Newhaven Cliffs</a>: 91% favourable, 9% unfavourable recovering (2009-2014)</li> <li>• <a href="#">SAC/SSSI</a>: 71.2ha (2 sites)</li> <li>• <a href="#">LNR</a>: 690ha (6 sites within City Plan area)</li> <li>• <a href="#">LWS</a>: 52 designated sites and 1 candidate site within City Plan area</li> <li>• New build in 2017/18 resulted in loss of 0.05ha deciduous woodland.</li> <li>• New build development in 2017/18 provided: 472m2 Chalk/flower rich grassland.</li> <li>• <a href="#">32% of local sites were in positive conservation management (2017/18)</a></li> </ul>	<ul style="list-style-type: none"> <li>• % units in favourable condition has declined at Castle Hill.</li> <li>• No change at Marina to Newhaven Cliffs.</li> <li>• No change to SSSI ha</li> <li>• LNR: no change to numbers however some areas of proposed LNRs not within designated LNR boundaries.</li> <li>• Number of LWS in BH administrative area (not SDNP) has increased from 26 to 52 therefore improved. Area unknown.</li> <li>• No discernible</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	Green Network/Nature Improvement Area			<p>trend in either losses or gains.</p> <ul style="list-style-type: none"> <li>Reduction in proportion of sites in positive management, decreased from 50% in 2013/14.</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>	<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 secured towards open space enhancement/improvement</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">2.8ha/1,000 natural/semi-natural</a></li> <li><a href="#">0.047ha/1,000 children's &amp; YP</a></li> <li><a href="#">0.92ha/1,000 parks &amp; gardens</a></li> <li><a href="#">0.59ha/1,000 amenity</a></li> <li><a href="#">0.23ha/1,000 allotments (all 2009)</a></li> <li>New residential developments submitting a SC in 2017/18 resulted in net gain of 2,886m<sup>2</sup> open space</li> <li><a href="#">1,186 people on waiting list for an allotment (2019)</a></li> <li>£831,517 secured towards open space improvements in 2017/18</li> </ul>	<ul style="list-style-type: none"> <li>No change in open space standards</li> <li>Increase in open space from previous year.</li> <li>Small reduction (c.5%) in number of people on waiting list therefore improving</li> <li>No relevant trend can be identified from S106 contributions as this depends on various factors including the amount and types of development</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
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>	<ul style="list-style-type: none"> <li>• Number of applications permitted contrary to comments received by the SDNPA</li> <li>• Number of sustainable routes available to access the SDNP</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">No consents granted contrary to comments (2017/2018)</a></li> <li>• <a href="#">There are 33 bus routes that run from Brighton &amp; Hove covering access to various points and towns in the Downs</a></li> </ul>	<p>approved.</p> <ul style="list-style-type: none"> <li>• No change</li> <li>• No change</li> </ul>
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> </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> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">479 Grade I and II* Listed Buildings (2017/18)</a></li> <li>• <a href="#">8 LB (1.6%) on at risk register (Dec 2018)</a></li> <li>• <a href="#">7 CA (17%) on at risk register (2018)</a></li> <li>• <a href="#">No CA de-designated (2017/18)</a></li> <li>• <a href="#">18% of CA: loss of detail significant/very significant (2017/2018)</a></li> </ul>	<ul style="list-style-type: none"> <li>• No change in number of LBs</li> <li>• Number of LBs at risk has reduced from 9 to 8.</li> <li>• Number of CAs at risk has increased from 6 to 7.</li> <li>• No CA de-designated – no change</li> <li>• Increased; based on CA at risk.</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	<ul style="list-style-type: none"> <li>Take into account the existing character of adjacent communities and neighbourhoods.</li> </ul>	<ul style="list-style-type: none"> <li>% of Conservation Areas where the loss of historic detail is considered to be significant or very significant</li> </ul>		
<p>5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice</p>	<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>	<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 within 500m of local facilities</li> <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>	<ul style="list-style-type: none"> <li><a href="#">0.86 cars/household (2011)</a></li> <li><a href="#">38% households have no car (2011)</a></li> <li><a href="#">1.1 tonnes/capita (2016)</a></li> <li>New build residential developments approved in 2017/2018 stated: 36% within 500m of doctors, 44% open space, 60% bus stop/rail station, 35% infant junior or primary school, 42% retail.</li> <li>100% of the new build residential applications approved and completed in 2017/2018 with a sustainability checklist provided cycle parking</li> <li><a href="#">Census 2011: 24% bus/train; 37% car; 5% bike; 20% on foot</a></li> <li>19% (46) new build resi development approved &amp; completed 17/18 included car free units.</li> </ul>	<ul style="list-style-type: none"> <li>No update</li> <li>No update</li> <li>No change to transport carbon emissions per capita since 2013</li> <li>No measurable trend in accessibility.</li> <li>Increase from previous year.</li> <li>No update</li> <li>No data from previous year.</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse																																																
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> <li>Annual mean concentrations (<math>\mu\text{g}/\text{m}^3</math>) of NO2 at Rottingdean monitoring sites.</li> <li>Annual mean concentrations</li> </ul>	<ul style="list-style-type: none"> <li>2013 AQMA designation unchanged.</li> <li><a href="#">Beaconsfield Road PM10: 27.7 (2012)</a></li> <li><a href="#">North Street PM10: 26<math>\mu\text{g}/\text{m}^3</math> (2014)</a></li> <li><a href="#">North Street PM2.5: 10.6 <math>\mu\text{g}/\text{m}^3</math> (2017)</a></li> <li><a href="#">Lewes Road PM2.5: 6.4 <math>\mu\text{g}/\text{m}^3</math> (2017)</a></li> </ul> <table border="1" data-bbox="1406 671 1850 1428"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> <th><a href="#">2017</a></th> </tr> </thead> <tbody> <tr> <td>North Street</td> <td></td> <td></td> <td></td> </tr> <tr> <td>C11-12 (clock tower)</td> <td>91.9</td> <td>100.3</td> <td>77.9</td> </tr> <tr> <td>C11 (middle)</td> <td>59.8</td> <td>60.3</td> <td>57.3</td> </tr> <tr> <td>C10-12 Ship Street)</td> <td>47.1</td> <td>48.3</td> <td>45.2</td> </tr> <tr> <td>London Road</td> <td></td> <td></td> <td></td> </tr> <tr> <td>C18</td> <td>62.1</td> <td>64.3</td> <td>58.1</td> </tr> <tr> <td>C19</td> <td>43.2</td> <td>43.8</td> <td>44.9</td> </tr> <tr> <td>C20</td> <td>39.7</td> <td>41.3</td> <td>40.5</td> </tr> <tr> <td>C23</td> <td>43.9</td> <td>46</td> <td>47</td> </tr> <tr> <td>Rottingdean</td> <td></td> <td></td> <td></td> </tr> <tr> <td>E22</td> <td>31.6</td> <td>39.1</td> <td>41.4</td> </tr> </tbody> </table>		2015	2016	<a href="#">2017</a>	North Street				C11-12 (clock tower)	91.9	100.3	77.9	C11 (middle)	59.8	60.3	57.3	C10-12 Ship Street)	47.1	48.3	45.2	London Road				C18	62.1	64.3	58.1	C19	43.2	43.8	44.9	C20	39.7	41.3	40.5	C23	43.9	46	47	Rottingdean				E22	31.6	39.1	41.4	<ul style="list-style-type: none"> <li>No change in AQMA designation since 2013</li> <li>PM10 no longer monitored due to lack of exceedances.</li> <li>Level of PM2.5 reducing therefore improving over time although North Street exceeds guidance.</li> <li>Both North Street and London Road continue to exceed hourly and annual mean.</li> <li>Rottingdean – some exceedances however long-term trends suggest improvement over longer term.</li> </ul>
	2015	2016	<a href="#">2017</a>																																																	
North Street																																																				
C11-12 (clock tower)	91.9	100.3	77.9																																																	
C11 (middle)	59.8	60.3	57.3																																																	
C10-12 Ship Street)	47.1	48.3	45.2																																																	
London Road																																																				
C18	62.1	64.3	58.1																																																	
C19	43.2	43.8	44.9																																																	
C20	39.7	41.3	40.5																																																	
C23	43.9	46	47																																																	
Rottingdean																																																				
E22	31.6	39.1	41.4																																																	

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse								
		<p>(<math>\mu\text{g}/\text{m}^3</math>) of NO2 Lewes Road (BH6) continuous analyser.</p> <ul style="list-style-type: none"> <li>Number of Quiet Areas designated</li> </ul>	<table border="1" data-bbox="1406 236 1852 316"> <tr> <td>E23</td> <td>37.7</td> <td>38.4</td> <td>35.3</td> </tr> <tr> <td>E24</td> <td>-</td> <td>32.4</td> <td>30.4</td> </tr> </table> <ul style="list-style-type: none"> <li>Lewes Road: 51.1 <math>\mu\text{g}/\text{m}^3</math> (2017)</li> <li>No quiet areas designated</li> </ul>	E23	37.7	38.4	35.3	E24	-	32.4	30.4	<ul style="list-style-type: none"> <li>Lewes Road – no improvement and monitoring seems to suggest increase in last 5 year period.</li> <li>No further update</li> </ul>
E23	37.7	38.4	35.3									
E24	-	32.4	30.4									
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> <li>Reduce water consumption</li> <li>Maximise re-use of waste-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><a href="#">Poor (2016)</a></li> <li><a href="#">Excellent Bathing Water Quality across all 4 beaches (2018)</a></li> <li><a href="#">100% approved new residential achieved 110l/p/day CP8 target (2017/18)</a></li> <li><a href="#">142l/person/day (metered) 155l/person/day average (2015/16)</a></li> <li><a href="#">100% non-residential new development completed in 2017/18 met required BREEAM standards</a></li> <li>In 2017/18 51% new build residential development completed included SUDs.</li> </ul>	<ul style="list-style-type: none"> <li>No further update or change in status.</li> <li>Stable at 3 beaches an improvement at Brighton Kemptown.</li> <li>No change from previous year.</li> <li>No further update but trends suggest water consumption decreasing over time</li> <li>No change from previous year.</li> <li>Increase from previous year.</li> </ul>								

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
8. To reduce the risk from all sources of flooding to and from development	<ul style="list-style-type: none"> <li>• Conserve and maintain water resources</li> <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 in a year when groundwater level at Patcham exceeds long term average</li> <li>• % Development incorporating SUDS</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">2017/2018 – none permitted against advice of EA</a></li> <li>• Data not available</li> <li>• <a href="#">Jan 2018-2019 –10 out of 12 months exceeded the long term average however were not above the level whereby flooding is expected.</a></li> <li>• In 2017/18 51% new build residential development completed included SUDs.</li> </ul>	<ul style="list-style-type: none"> <li>• No change from previous year.</li> <li>• Data not available</li> <li>• No measurable trend as such.</li> <li>• Increase from previous year.</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</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</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Domestic Gas: 11,719kw/meter (2016)</a></li> <li>• <a href="#">Domestic Elec: 3,456kw/consumer (2016)</a></li> <li>• <a href="#">Commercial Gas: 345,619 (2016)</a></li> <li>• <a href="#">Commercial Elec: 36,262 (2016)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Stable gas consumption</li> <li>• Slight reduction in electricity consumption</li> <li>• Reduction in commercial gas consumption</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	described building standards / or environmental standards	(kt/capita) <ul style="list-style-type: none"> <li>• % residential development achieving CP8 minimum standards for energy efficiency</li> <li>• % non-residential development achieving CP8 minimum BREEAM standards</li> <li>• Number of schemes incorporating low/zero carbon energy infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">1.3 tonnes/capita (2016)</a></li> <li>• <a href="#">100% approved new residential achieved 19% Co2 reduction target (2017/18)</a></li> <li>• <a href="#">100% non-residential new development approved in 2016/17 met required BREEAM standards</a></li> <li>• 67% of the residential development approved with a Sustainability Checklist in 2017/18 proposed LZC technologies</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction in commercial electricity consumption</li> <li>• Decreased from 1.8t/p in 2013</li> <li>• No change from previous year.</li> <li>• No change from previous year.</li> <li>• Reduction from previous year.</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</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>• 15% of residential development approved with a Sustainability Checklist incorporated either a green roof or a green wall</li> <li>• <a href="#">3.9% of residential development on greenfield (2017/2018)</a></li> <li>• In 2017/18 51% new build residential development completed included SUDs.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction from previous year.</li> <li>• Development on previously developed sites continues to be predominant however proportion on greenfield land has increased since previous monitoring year</li> <li>• Increase from previous year</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	<p>efficient use of resources.</p> <ul style="list-style-type: none"> <li>Encourage the 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>	<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> <li>Numbers of development proposals which will result in remediation of contaminated land</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">2,959ha in Stewardship scheme (2018)</a></li> <li><a href="#">There are at least 2805 prioritised sites under Part 2 A of the Environmental Protection Act 1990 (2017/18)</a></li> <li>Data not available</li> </ul>	<ul style="list-style-type: none"> <li>Reduction from previous year. No change. ES scheme now closed to new applicants.</li> <li>No change</li> <li>Data not available.</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>	<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><a href="#">103,804 tonnes/annum (2017/18)</a></li> <li><a href="#">575kg (2017/18)</a></li> <li><a href="#">In 2017/18:</a></li> <li><a href="#">Reused: 1%</a></li> <li><a href="#">Recycled: 23%</a></li> <li><a href="#">Composted: 3%</a></li> <li><a href="#">Recovered: 70%</a></li> </ul>	<ul style="list-style-type: none"> <li>Reduced since last monitoring period but little reduction over time.</li> <li>Reduced since previous year but little overall change in amount.</li> <li>Little change in proportions reused, recycled, composted or</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
				recovered over last 4 year period.
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>	<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>• <a href="#">96.1% of dwellings on PDL (2017/18)</a></li> <li>• <a href="#">100% employment land on PDL (2017/2018)</a></li> <li>• <a href="#">3.9% residential and 0% employment on greenfield land (2017/18)</a></li> <li>• <a href="#">161 empty properties brought back into use (2017/2018)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Development on previously developed sites continues to be predominant for all uses.</li> <li>• Number of properties brought back into use continues to exceed annual target</li> </ul>
Social				
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</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</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">444 dwellings (net) (2017/18)</a></li> <li>• <a href="#">96 affordable dwellings of which 96 social rented (2017/18)</a></li> <li>• <a href="#">125 student bedspaces completed (17/18)</a></li> <li>• Ratio: 12.08 (income £30,050 to <u>average price £363,106</u>) (2018)</li> <li>• <a href="#">No new Gypsies and</a></li> </ul>	<ul style="list-style-type: none"> <li>• Increase on 2016/17 which had seen a drop in completions after a steady increase since recession reduction.</li> <li>• Amount of AH reducing and not</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	<p>and travellers, and smaller households.</p> <ul style="list-style-type: none"> <li>• Provide decent, high quality housing that can meet changing requirements.</li> </ul>	<p>ratio</p> <ul style="list-style-type: none"> <li>• Number of Gypsy and Traveller pitches delivered</li> <li>• Number of households on the housing register</li> </ul>	<p><a href="#">Travellers pitches delivered however development of 12 permanent pitches completed in 2016</a></p> <ul style="list-style-type: none"> <li>• <a href="#">14,815 households on the housing register (as at April 2018)</a></li> </ul>	<p>meeting local need.</p> <ul style="list-style-type: none"> <li>• Increase from previous year.</li> <li>• Ratio continues to increase therefore situation worsening</li> <li>• No new pitches delivered or planned.</li> <li>• Number of households on the housing register has decreased significantly (c.305) however this may reflect change in council policy</li> </ul>
<p>15. To improve the range, quality and accessibility of services and facilities.</p>	<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</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</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">4 successful applications (2017/18) bringing the total to 13 current ACVs.</a></li> </ul> <p><a href="#">2017/2018:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">A1: -2,984m2</a></li> <li>• <a href="#">A2: -518m2</a></li> <li>• <a href="#">A3: 1,156m2</a></li> <li>• <a href="#">A4: 0</a></li> </ul>	<ul style="list-style-type: none"> <li>• No trend as such.</li> <li>• A1: continuing trend of net loss</li> <li>• A2 – continuing trend of net loss</li> <li>• A3- continuing trend of net gain</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	<p>facilities by sustainable transport.</p> <ul style="list-style-type: none"> <li>• Enable communities to meet their day-to-day needs locally</li> </ul>	<p>(D1-D2)</p> <ul style="list-style-type: none"> <li>• Vacancy rates in Town Centres and District Centres</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">A5: 140m2</a></li> <li>• <a href="#">D1: 2,628m2</a></li> <li>• <a href="#">D2: 7,251m2</a></li> </ul> <p><a href="#">2016/2017:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Brighton: 6%</a></li> <li>• <a href="#">Hove TC: 3%</a></li> <li>• <a href="#">London Road TC: 9%</a></li> <li>• <a href="#">St James Street DC: 6%</a></li> <li>• <a href="#">Lewes Road DC: 6%</a></li> <li>• <a href="#">Boundary Road DC: 11% now</a></li> </ul>	<ul style="list-style-type: none"> <li>• A4 – first time none lost or gained in last 8 year period.</li> <li>• A5 – little change</li> <li>• D1 – continuing to increase</li> <li>• D2 – continuing to increase</li> <li>• Brighton slight increase</li> <li>• Hove no change</li> <li>• London Rd</li> <li>• St James decreased therefore improved</li> <li>• Lewes Rd decreased therefore improved</li> <li>• Boundary Rd increased therefore worsened.</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</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</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 (2011)</li> <li>• <a href="#">Male: 79.5 (2014-2016)</a></li> </ul>	<ul style="list-style-type: none"> <li>• No further update</li> <li>• No further update</li> <li>• Increased therefore improving</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
	<p>various types of open space.</p> <ul style="list-style-type: none"> <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>	<p>limited a little or a lot by health or disability</p> <ul style="list-style-type: none"> <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 or through developer contributions</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Female: 83.4 (2014-2016)</a></li> <li>• <a href="#">Male: 61.6 (2018)</a></li> <li>• <a href="#">Female: 62.2 (2018)</a></li> <li>• <a href="#">6.3% (2016/2017)</a></li> <li>• <a href="#">74.1% (2017/18)</a></li> <li>• None (2017/2018)</li> </ul>	<ul style="list-style-type: none"> <li>• Increased therefore improving</li> <li>• Decreased therefore worsening</li> <li>• Decreased therefore worsening</li> <li>• Decreasing therefore improving</li> <li>• Increasing therefore improving</li> <li>• No change</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>	<ul style="list-style-type: none"> <li>• Crime rate per 1,000 population</li> <li>• % residents who say they feel unsafe in their local area after dark</li> <li>• Numbers killed or seriously injured in road traffic accidents per 100,000 population</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">90.42 crimes per 1,000 population (Sep 2017/2018)</a></li> <li>• <a href="#">11% feel unsafe after dark (City Tracker 2018)</a></li> <li>• <a href="#">56 (2014-2016)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Increased from 88.69 in 2016/2017)</li> <li>• No change therefore no better and no worse</li> <li>• Little change over time. Significantly</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
				higher than regional average
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>• % households 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 standard 9-5 pass at GCSE</li> <li>• Average attainment 8 score</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">94% - get on well (2018)</a></li> <li>• <a href="#">11.4% - in fuel poverty (2014-2016)</a></li> <li>• <a href="#">15.4% children in poverty (2014-2016)</a></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>• <a href="#">67.6% achieved standard 9-5 pass (2016/2017)</a></li> <li>• <a href="#">49 average attainment 8 score (2016/2017)</a></li> <li>• <a href="#">30.8 average attainment 8 score (FSM) (2016/2017)</a></li> </ul>	<ul style="list-style-type: none"> <li>• Increased slightly therefore improved</li> <li>• Decreased slightly</li> <li>• Decreased therefore improved</li> <li>• No further IMD update available</li> <li>• No further IMD update available</li> <li>• No further IMD update available</li> <li>• Not comparable due to change in GCSE</li> <li>• Not comparable due to new statistic</li> <li>• Not comparable due to new statistic</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
		<ul style="list-style-type: none"> <li>Average attainment 8 score for children in receipt of Free School Meals achieving 5 GCSEs</li> </ul>		
<b>Economic</b>				
<p>19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>	<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>	<ul style="list-style-type: none"> <li>GVA per head</li> <li>Average weekly wages (residents and workplace)</li> <li>Amount of money secured via Developer Contributions for training through the Local Employment Scheme</li> <li>Net amount B use floorspace completed (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</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">GVA/head £24,989 (2015)</a></li> <li><a href="#">Residents median total annual earnings £24,469 (2018)</a></li> <li>LES contributions £781,844 (2017/2018)</li> <li><a href="#">2017/2018 overall net loss of -6.923m2 as follows:</a></li> <li><a href="#">B1a: -224m2</a></li> <li><a href="#">B1b: 0</a></li> <li><a href="#">B1c: -4483</a></li> <li><a href="#">B2: -310</a></li> <li><a href="#">B8: B8</a></li> <li><a href="#">4,329m2 emp. floorspace lost to residential development via prior approval (2017/2018)</a></li> <li><a href="#">76.9% of working age population economically active (2018)</a></li> <li><a href="#">5.7% of working age population unemployed (2018)</a></li> <li><a href="#">2.3% of the working age</a></li> </ul>	<ul style="list-style-type: none"> <li>Increased therefore improving</li> <li>Increased therefore improving</li> <li>Increased</li> <li>B - continuing trend of overall net loss across all B uses.</li> <li>B lost to resi via prior approval continuing</li> <li>Increased therefore improving</li> <li>Little change</li> <li>Increased therefore worsened</li> <li>ONS predictions suggest this has decreased</li> </ul>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)	Indicators	Baseline Data	Indicative trend – same, better, worse
		of work benefits <ul style="list-style-type: none"> <li>• % population with no qualifications</li> <li>• Amount and % of people travelling out of the city for work</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">population claim out of work benefits (2018)</a></li> <li>• <a href="#">Working age population with no qualifications: 2.6% (2018)</a></li> <li>• 31,915 daily in-commuters</li> <li>• 37,310 daily out-commuters (19% of working age population at time of Census)</li> </ul>	therefore improving <ul style="list-style-type: none"> <li>• No further update</li> </ul>

## Appendix C Consultation – Summary of representations and full transcripts

### Analysis of Representations

Sustainability Appraisal			
<b>Total Number of Responses</b>		7	
<b>Number of Representations that Support</b>			
<b>Number of Representations that Object</b>		4	
<b>Number of Representations – Other</b>		3	
Summary of Comments			
Issue/ Site Allocation	Summary of Comments	Respondent Number and Name	Officer Response
Object			
<b>SA site assessments</b>	SA site assessments don't consider new Local Wildlife Site designations.	DP289 Sussex Wildlife Trust	Comment noted. Relevant site assessments will be updated to reflect LWS Study 2017 and the results of CPP2 consultation on LWS.
	Unclear why SA site assessment process has not been used to discount sites.	DP289 Sussex Wildlife Trust	Comment noted. Further clarification on the aims of the SA site assessment process and how this was carried out, including why sites have not been discounted, will be added. It should be noted that higher level studies, undertaken at the direction of the Planning Inspector of the EIP for City Plan Part 1 in order to look more positively for development

			opportunities, such as the Urban Fringe Assessments, identified some sites considered suitable for development. This included those with certain designations where issues were considered to be able to be mitigated.
	Site allocation assessments for H1 and H2 should include Heritage Impact Assessments to help inform quantum.	DP284 Historic England (in response to H1 and H2)	Comment noted. SA Framework includes Objective 4 which helps to highlight potential heritage constraints based on proximity. UFFA2015 Archaeology included consideration of heritage impacts for urban fringe (H2) sites. Full Heritage Assessments would be required at planning application stage where relevant.
	Disagreement with SA scores for certain site assessments (Belgrave Centre, Land north east of Coldean Lane, and Land at and adjoining Brighton Race Course). SA scores should be amended more positively to: reflect status of site (e.g. vacant PDL); reflect ecological surveys undertaken by the representor; and reflect proposals being put forward by representor including an increased quantum of housing; and should be awarded a “no impact” score until certain assessments have been carried out including for transport, archaeology, heritage, water quality and air quality.	DP214 Brighton & Hove Design and Build	Comment noted. Scoring criteria is set out in SA Framework must be adhered to across all sites to ensure a consistent approach. Site assessments of sites without a planning consent based on designations, proximity and any relevant background evidence. SA site assessments cannot assume proposals will overcome issues. SA site assessments for these sites will be re-considered with suggestions, however it is considered unlikely that the scores will change significantly.
<b>Disagreement with SA policy assessments</b>	Appraisal for DM37 is too positive and doesn't reflect that the policy will allow for development on designated sites. Appraisal contrary to SA Framework.	DP289 Sussex Wildlife Trust	Comment noted. All policies will be re-appraised as part of the process of preparing the Proposed Submission

			Plan. SA will re-appraise the revised version of this policy against the SA Framework and will take these comments into consideration during the appraisal.
	Appraisal of DM1 doesn't assess certain aspects of the policy, including space standards, accessibility standards and requirement for amenity space and how these impact on viability or cost of housing.	DP260 Lewis & Co (in response to DM1)	Comment noted. SA of DM1 makes reference to these standards under various objectives. SA will re-appraise the Proposed Submission version of this policy in accordance with the SA Framework and will make note of the potential for certain requirements to increase housing cost where considered relevant, using emerging viability evidence if available.
<b>SA not assessed reasonable alternatives</b>	No consideration of reasonable alternatives to policy DM1 i.e. approach of "not including standards".	DP260 Lewis & Co (in response to DM1)	Comment noted. SA assessed a "no policy approach" as an alternative to the policy. Included within Appendix D of SA Report 2018.
<b>Likely future baseline questionable</b>	Information sources not included for likely future baseline.	DP289 Sussex Wildlife Trust	Comment noted. Reference sources will be added to this section where possible.
<b>Incorrect terminology</b>	SA refers to "proposed LWS" rather than "designated LWS".	DP289 Sussex Wildlife Trust	Comment noted. References will be amended as appropriate.
Other			
<b>Suggested SA site assessment for new site</b>	Additional site (Dolphin House, Manchester Street) put forward for residential development. Suggested SA site assessment submitted.	DP261 Hargreaves	Comment noted. Information submitted will be taken into account if this site is considered suitable for site allocation.

<b>Suggested SA site assessment for allocated site with different use proposed</b>	Existing H1 site (27-31 Church Street) recommended for PBSA Suggested SA site assessment submitted relating to the site being allocated for PBSA.	DP261 Hargreaves	Comment noted. Information submitted will be taken into account if this site is considered suitable for PBSA allocation.
<b>Consideration of proximity to LNRs in H1 and H2 sites</b>	Some H1 and H2 sites are in close proximity to LNRs and should include consideration of mitigation.	DP189 Natural England (in response to H1 and H2)	Comments noted. SA site assessments will be checked and amended to refer to proximity to LNR where appropriate.
<b>Consideration of Groundwater Source Protection Zones in H1, H2 and H3 sites</b>	Some H1, H2 and H3 sites are within GSPZ and should include this as a consideration within policy wording	DP162 Environment Agency (in response to H1, H2 and H3)	Comments noted. SA site assessments will be checked and amended where appropriate.
<b>No comments</b>	No comments provided directly on the SA due to time constraints	DP162 Environment Agency	Noted.

## Full consultation transcripts

(nb: this includes consultation responses on other sections of the City Plan Part 2 or associated documents that referred to the Sustainability Appraisal)

Rep Number	Name	Policy referred to / section	Comment
DP289	Sussex Wildlife Trust	H2	<p>The site assessments within the SA does not appear to acknowledge the newly designated LWS despite this document being produced after the Local Wildlife Site review dated June 2017.</p> <p>The following site allocations should be removed from Table 7 and from the policies map. Or the boundaries redrawn to remove any site allocation that sits on a site designated for its biodiversity value:</p> <ol style="list-style-type: none"> <li>1 Land at Oakdene, Southwick Hill / Land West of Mile Oak Road</li> <li>2 Land at Mile Oak Road, Portslade</li> <li>3 Benfield Valley</li> <li>4 Land at and adjoining Brighton Race Course</li> <li>5 Land North of Warren Road (Ingleside Stables)</li> <li>6 Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls</li> <li>7 Land adjacent to Ovingdean and Flamer Road, Ovingdean</li> <li>8 Land at and adjoining Horsdean Recreation Ground, Patcham – Subject to progression of Local Wildlife Site designation</li> </ol>
DP289	Sussex Wildlife Trust	AOB1	<p>It is not clear to the Sussex Wildlife Trust why the SA process was not used to discount sites for allocation. The NPPF is clear that council's should use local plans to achieve sustainable development, taking account of three interdependent objectives – economic, social and environmental. If assessment against the SA framework concludes significant negative impacts then an allocation cannot be considered sustainable.</p> <p>We note that the sites designated as Local Wildlife Sites within the CPP2 are only referred to as proposed LWSs within the SA. The SA should be updated to include the information stated in the Local Wildlife Site review dated June 2017.</p> <p>Section 3: We question some of the likely future baseline points as there are no references, for example the statement that bus patronage has decreased in the short-term, however longer term trends suggest that it will increase. Future iterations of the SA should include information on what these baseline points are based on.</p>

			<p>Section 5: The Sussex Wildlife Trust disagrees that policy DM37 should ensure that both non-designated and designated sites are protected and provides clear requirements regarding mitigation. We acknowledge that there may be potential for positive effects for biodiversity (section 5.4), but there is also a great potential for negative effects through setting a precedent for developing locally designated sites. Additionally the policy appraisal has a 'plus' for SA objective 1. This is contrary to the SA Framework (Table 3.2) which states that sites that contain a locally designated site or is on a greenfield site with potential for some biodiversity interest should have a negative score. We understand that the framework was used as a guide only and that informed interpretation was needed but this seems an excessive under assessment of impacts. It must be acknowledged that lower ecological value does not equate to low ecological value.</p> <p>Section 5.6 of the SA states that none of the sites for policy H1 have a nature conservation designation which is now not true for 'Land between Marina Drive and rear of 2-18 The Cliff, Brighton. We are concerned that whilst the SA is dated June 2018 and the Local Wildlife Sites review was carried out in 2017, there does not seem to be any cross referencing.</p>
DP284	Historic England	H1	Notwithstanding the requirement to assess development against all the policies in the plan, including those in CPP1 noted above, all sites to be included in Table 5 - Residential Site Allocations and Table 6 - Mixed Use Site Allocations attached to H1 Housing Sites and Mixed Use Sites, should be assessed for heritage impacts and where appropriate a heritage impact assessment required as part of the site allocation assessment. Historic England would be pleased to provide advice on sites containing designated heritage assets that would normally be referable for our advice.
DP284	Historic England	H2	Site in Table 7 Urban Fringe Allocations that are noted to have historic environment (i.e. archaeology, heritage) or related (i.e. landscape) considerations should be required to have a heritage impact assessment undertaken to help inform the appropriate form and quantum of development in each case.
DP214	Brighton & Hove Design and Build Company	Site allocations topic paper	<p>DP214 – Brighton &amp; Hove Design and Build Company Site Allocations Topic Paper June 2018</p> <p>5.7. This report outlines BHCC's approach to housing delivery up to 2030. It includes extracts of the Sustainability Appraisal specifically applicable to all of the proposed allocations and housing policies H1 and H2 of the Draft CCP2. Appendix 3 contains site profiles for all sites assessed. The Portslade site is assessed at page 98. The following comments are made in relation to these assessments.</p> <p>Portslade</p> <p>5.8. Firstly, the quantum of development should be increased as per the above recommendations. This is particularly relevant given the status of the site as vacant previously developed land within the defined settlement, in addition to the accessibility of the area, which BHCC has noted in the "overall summary" (reference to "good access to" local services and public transport facilities). Furthermore, reference is made to</p>

		<p>the submitted JAAP and ability of the site to deliver a development of 6 storeys. Given the accessibility of this location and the Government’s emphasis on optimising the use of PDL to deliver homes and other development needs, a 6 or more storey development on the site can accommodate much more than 45 homes.</p> <p>5.9. Evidently the site has capacity to accommodate a considerably greater number of new homes than BHCC suggests. These are required to meet housing needs, and to assist in addressing the issue of affordability. Furthermore, redevelopment of the site will improve the overall appearance of the site which is suggested to be “run down” in BHCC’s assessment. Irrespective of whether the site will be used for market or affordable homes, the site should be put to the most efficient use possible, in line with the NPPF and objective of optimising vacant PDL.</p> <p>Coldean</p> <p>5.10. The assessment of this site refers to the site constraints including landscape, heritage and biodiversity. As outlined above, extensive survey work of the site has been undertaken and this has identified that when such considerations are taken into account, a scheme of circa 300 homes can be delivered. This would include appropriate mitigation of ecology and landscape in particular. Such evidence needs to be taken into consideration.</p> <p>Whitehawk</p> <p>5.11. This assessment shows the site area in the same form as that detailed in the UFA. This area for potential development was determined based on the high level UFA. Further site investigations, surveys and assessments have determined that this is not the most suitable area of land within the Whitehawk Urban Fringe site area to accommodate development. Some of this land is subject to ecological and habitat constraints. In addition there are landscape and visual considerations that are ultimately informing the layout of the scheme and the amount of development that can be achieved.</p> <p>5.12. As a result of these surveys, it has been determined that land to the south, slightly outside of BHCC’s assessed area for potential development is much more appropriate for use than land to the north. This is because land to the south is further down the ridge and therefore lower. This would mean that its development would have less visual impact on the surrounding area, and allow a taller structure, taking up a potentially smaller footprint that would otherwise be required to accommodate the level of development proposed. As such, key views, that BHCC is keen to preserve, can be retained, and a larger area of land at the site can be utilised for provision of green space, and landscaping and biodiversity enhancements.</p> <p>5.13. In light of this, it is recommended that the Plan showing the potential development area at Coldean, is amended to reflect that outlined in Appendix A. The red line shows the current potential development area, and the blue line is that now proposed. It is emphasised that this proposed change would result in a reduced site area compared to that identified by BHCC, yet overall a large amount of development can be achieved, the design of which will reflect the neighbouring blocks of flats. Evidence of this can be provided to BHCC to support the suggested change if this is required.</p>
--	--	---

			<p>5.14. Notwithstanding this, the report also refers to the site as having “<i>high value as designated open space with public access and public footpaths...</i>” It is correct that footpaths do cross the site. However, the area of land is, in part, overgrown, and therefore offers no amenity or physical recreational value to the local community. This statement should be amended.</p> <p>5.15. It is noted as part of the redevelopment of the site, there may be an opportunity to provide improvements to amenity and recreation for the local community on this site. This could include upgrades to existing footpath links through the site.</p> <p>All sites</p> <p>5.16. In all instances the site summaries states that “<i>The site is owned by BHCC and has been identified as a one of the priority sites within a Joint Venture Initiative (BHCC working with Hyde New Homes) to deliver 1,000 affordable homes across the city which shows willingness to develop the site.</i>” Whilst this does show “willingness” to develop the sites, it is not in any way reflected in the draft CPP2. It is also, more importantly, not the reason why any of the sites have been proposed for allocation by BHCC and therefore whether it is proposed to deliver market or affordable housing, BHCC should be seeking to maximise the housing delivery opportunity from these sites which have been assessed as suitable for development.</p> <p>5.17. Overall, the assessments contained in this Topic Paper have clearly informed the draft policies. However, the UFA, which ultimately underpins the proposed urban fringe allocations was carried out on a high level basis, and does not include site specific assessments. These assessments have been carried out by our client and their appointed consultants. These have demonstrated that a higher capacity of development can be accommodated on the urban fringe sites without harm being caused. Furthermore given the sustainability and accessibility of the Portslade site, in addition to its status as vacant PDL, BHCC should be seeking to maximise delivery from the site in order to help address the shortfall against identified housing needs compared to the adopted target.</p> <p>Recommendation: Reassess the sites within the Topic Paper and refer to the higher quantum of homes that can be delivered having regard to the site specific surveys and assessments undertaken by our client. This is required to ensure that the sites themselves can be delivered over the Plan period, and therefore to ensure that the CPP2 is effective and positively prepared</p>
DP214	Brighton & Hove Design and Build Company	AOB1	<p>Sustainability Appraisal June 2018 (SA)</p> <p>5.21. The SA provides an assessment of each of the three sites. the following table shows a summary of these assessments and commentary is provided below:</p> <p>Portslade</p> <p>5.22. Broadly the conclusions of the SA are considered correct. Those given a negative score appear to relate to the site’s location and former business uses. Technical matters such as noise and flood risk can be addressed as the scheme for the site is progressed and appropriate mitigation included. This would ensure that the development is acceptable in planning terms. The status of the site as vacant PDL within a settlement boundary</p>

		<p>should however be fully recognised within the SA and scores increased accordingly to reflect the need for such land to be put to the most efficient use possible.</p> <p>Coldean</p> <p>5.23. In relation to objective 1, ecological surveys of the site have been undertaken. These have identified instances where net gains in biodiversity at the site can be provided including through mitigation and new areas of habitat. The development of the site will therefore provide the opportunity to improve biodiversity. As such it is considered that at the very least the site should be scored a “0” if not a “+” in relation to objective 1.</p> <p>5.24. Objective 2 refers to the site as providing informal recreation. However, this is only considered to be provided through the footpaths that are within the site. The proposals for the site allow for the retention and improvement of footpath links, improving their value from a recreation and accessibility point of view. Again the score for this site should be reassessed as “+” at least. This equally applies to the ability to provide access to the South Downs National Park. BHCC advises that the landscape is affected by the <i>“urbanising influencing, such as the A27 and presence of existing housing across Coldean Lane”</i>. The site assessment should not be negative because of this existing transport infrastructure. Any development on the site would be seen against this existing backdrop and would not negatively affect the National Park to any greater degree than existing.</p> <p>5.25. In respect of objective 4 archaeological assessments of the site are being undertaken. Simply because the site is within the ANA, does not mean that its development will have a negative effect. Until such time as the assessments are available, this should be reassessed as “0”. This also applies to transport, water quality and air quality. Furthermore, in respect of climate change (objective 10) the sites’ ability to secure greenfield run off rates for a development will be explored as the scheme is progressed. An extensive area of the site will also be retained as green space and this will further serve the function of objective 10.</p> <p>5.26. In respect of objective 13, the score should be changed to “++” on the basis that a higher quantum of development can be achieved and therefore, the scheme will make the most efficient use of land available. It is highlighted that a higher density of development on this site would not deter any urban regeneration or higher density development elsewhere, particularly given BHCC’s considerable housing needs.</p> <p>Whitehawk</p> <p>5.27. In relation to objective 1, ecological surveys of the site have also been undertaken. These have identified instances where net gains in biodiversity at the site can be provided including through mitigation and new areas of habitat. In addition, areas of higher ecological value are not proposed to be developed. The development of the site will therefore provide the opportunity to improve and secure the long term management of land for biodiversity purposes. As such the site should be scored a “+” in relation to objective 1.</p> <p>5.28. In respect of objective 2, the site provided very limited recreation value due to the overgrown nature of a large part of it. The footpaths through the site will be retained and improved as part of the redevelopment of the</p>
--	--	---

			<p>site. This will provide amenity enhancements and therefore the site should be scored a “0” at the very least in respect of objective 2.</p> <p>5.29. A score of “- -” is stated for objective 3 due to the proximity of the Whitehawk Camp Ancient Monument. This is not however considered to impact upon the site or its ability to be developed. Furthermore a development of the site is not considered likely to have any negative impact on the ancient monument. A heritage assessment is being undertaken and pending the results of this, it is fair and reasonable for the score against objective 3 to be changed to “0” as there is currently no evidence of an impact resulting.</p> <p>5.30. Similarly, the assessment in respect of transport and noise should be a score of “0” until such time as a full assessment of these matters has been undertaken.</p> <p>5.31. In respect of objective 17, the scheme for the site can be designed to ensure as far as possible, community safety and to design out crime. Whilst BHCC may consider that the area more generally warrants a “- -” score against this objective, it is evident that a high quality scheme on the site does provide the opportunity to address this objective in a positive way. Therefore, the score should in fact be “++” or at least “+” to reflect this.</p> <p>5.32. Recommendations: The SA for the three sites should be updated to show the positive impact that development will have against the SA objectives. The conclusions should also be “largely positive” to reflect this.</p>
DP261	Hargreaves (Lewis and Co)	AOB1	<p>Sustainability Appraisal – nb: in reference to Dolphin House, Manchester Street site – site being put forward. The site has not yet been assessed through the Sustainability Appraisal as a site option for residential development under Policy H1. We have provided a draft assessment of how we consider the site to perform against the Council’s identified sustainability appraisal objectives.</p> <p>We hope that the information below will help inform the Council’s own assessment of the site. (see original submission for table) We consider that the site provides a sustainable location for new residential development and is an appropriate future use of the site, should the existing employment use cease. The sustainability appraisal assessment undertaken above demonstrates that the site supports a significant number of the Council’s sustainability objectives and should be preferred as a future site for residential development over alternative sites across the city. Allocation within the City Plan – Part Two for a residential use (with B1 Office use included as a permitted additional use) would ensure an ongoing active use of the site and avoid the potential for the long periods of vacancy previously experienced at this location. Lewis &amp; Co Planning would welcome the opportunity to discuss the merits of the site in further detail with the Council.</p> <p>27-31 Church Street – put forward for PBSA</p> <p>Sustainability Appraisal The Council has undertaken an appraisal of the site as part of their Sustainability Appraisal process. We consider that this assessment would remain largely unchanged if the site were to be assessed on the basis of a student housing-led scheme. However there are some minor changes that should be considered. The site is currently assessed as having a potential ‘strong negative’ impact (-) against Objective 6</p>

			<p>(To reduce air and noise pollution), as the site is located within an Air Quality Management Area. The reason for this given is:“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”We consider that a purpose-built student housing use of the site would not generate the same adverse impacts due to a reduced need for commercial deliveries and an intentional reduction in provision of vehicular parking in favour of cycle parking and exploiting the city centre location of the site, with easy access to public transport. Student residents would primarily require access to their place of study, local shops/services and public amenities. The site has access to regular bus services between the city centre and University campuses (including Moulsecombe and Falmer campuses) from a bus stop 100m south of the site. The bus stop is also located outside a Sainsbury’s Local store (also 100m from the site) which provides day-to-day convenience goods for potential residents.On this basis, residents would have access to all necessary amenities, as well as a wide range of shops, services, cafes, restaurants, bars, employment opportunities and other places of interest. Private vehicle ownership would not be necessary for the vast majority of residents and therefore the vehicle movements generated by an active use of the site can be minimised. The development proposed would therefore not generate the “strong negative impacts” anticipated within the Sustainability Appraisal for the previously permitted scheme.The Sustainability Appraisal identifies a positive impact against Objective 13 but also identifies that the 9-dwelling scheme previously permitted would not provide a particularly efficient use of the site in residential density terms. In contrast, the delivery of a minimum of 70 bedspaces would provide a more efficient use of the site and would have more of a positive impact when assessed against Objective 13 (To make the best use of land available).The Sustainability Appraisal identifies several benefits from introducing an active use to the site, when assessed against Objective 17 (To improve community safety, and reduce crime and fear of crime), however these benefits do not appear to have been reflected in the effect identified (negative impact – ‘-’).It is our opinion that on this basis, the student housing use proposed would not result in any negative sustainability impacts when assessed against the 19 objectives. On this basis the use proposed provides sustainable development that contributes towards the wider aims of the City Plan – Part Two.It is not envisaged that there are any constraints that would restrict the site coming forward to deliver student housing at this site within the first five years of the Plan. Lewis &amp; Co Planning would welcome the opportunity to discuss the merits of the site in further detail with the Council.</p>
DP260	Lewis and CO	DM1	<p>The policy imposes a number of minimum requirements on new housing that have not been justified. There is no assessment of the impact of these standards on the viability of new housing delivery (particularly at a time where additional housing development is urgently needed and the City Council is failing to deliver enough housing to meet even 44% of its overall housing need).Any policies requirements that further constrain the delivery of new and affordable housing within the city should not be brought forward until the Council have a clear strategy to meet their own housing needs and a robust supply of housing land to do so.Planning practice guidance is clear on the considerations for local</p>

			<p>planning authorities where they seek to justify requiring internal space standards The implication of requiring these minimum space standards in new properties could well result in all new housing being less affordable than existing homes and further worsening the city's affordability issues. Whilst the delivery of more spacious, high quality new homes is no bad thing in isolation, the resulting effect on the city's already worsening affordability problems has the potential to create far worse social and economic sustainability impacts for residents. In this context, the failure to explore and understand the viability and affordability implications of Policy DM1 is concerning. In addition to these space standards, the Council is also seeking to require Building Regulation M4(2) accessibility standards as a minimum for all new residential accommodation. This will likely also constrain delivery and may even prevent the conversion of some existing (and historic) buildings. The Council should note Mid Sussex District Council's intention to require these standards for all new residential development, but the examining Inspector required this policy to be modified to only 20% of all developments of 5 or more dwellings to reflect "evidence of need". Further to this the requirement for useable private outdoor amenity space is not included in the exceptions caveat provided for criteria c) – e) (where robust justification has been made). Despite this caveat it is imperative that the Council understand the need for these requirements or the potential impact on development viability and deliverability before imposing them. The Council's Sustainability Appraisal does not even assess these aspects of the policy or consider reasonable alternatives (such as not including these as a requirement).</p>
DP162	Environment Agency	H1 and H2 H3	<p>Page 165 Table 5 - Residential Site Allocations. The following allocations have environmental constraints as follows:  46-54 Old London Road, Patcham BN1 8XQ - SPZ 1,2 and 3  Eastergate Road Garages, Moulsecoomb, Brighton, BN2 4PB – SPZ 1,2, and 3  Selsfield Drive Housing Office, Selsfield Drive, Brighton, BN2 4HA – SPZ 2 and 3  Tyre Co, 2-16 Coombe Road, Brighton, BN2 4EA – SPZ 1, 2 and 3  Buckley Close garages, Hangleton, BN3 8EU – SPZ 3  Former Hollingbury Library – SPZ3  Land at and surrounding Downsman Pub, Hangleton Way, Hove, BN3 8ES – SPZ3  There is nothing in the policy acknowledging that development must ensure that groundwater sources are protected  (again consistency with the writing of SSA4 and SSA7 would be recommended).  Page 168 onwards Table 6 - Mixed Use Site Allocations. The following allocations have environmental constraints as follows:  Former Dairy Crest Site, 35-39 The Droveway, Hove, BN3 6LF – SPZ 2 and 3  270 Old Shoreham Road – Historic landfill and SPZ 2 and 3</p>

			<p>Kingsway / Basin Road North – Flood Zone 2 and 3.</p> <p>Page 170 onwards H2 Housing Sites – Urban Fringe. The following allocations have environmental constraints as follows:  Land at Mile Oak Road, Portslade – SPZ 1, 2 and 3.  Land at and adjoining Horsdean Recreation Ground, Patcham – SPZ 2 and 3.  Land at Ladies Mile Carden avenue – SPZ 3.  Land to north east of Coldean Lane/ Land north of Varley Halls/ Land south of Varley Halls – SPZ 1,2 and 3.  Land adjacent to Ovingdean and Falmer Road, Ovingdean – SPZ3  Land at former nursery, Saltdean – SPZ 1, 2 and 3.  Cluster at Coombe Farm and Saltdean Boarding Kennels, Westfield Avenue, North Saltdean – SPZ 3.  Land west of Falmer Avenue, Saltdean – SPZ 2 and 3.</p> <p>Page 177 H3 Purpose Built Student Accommodation. The Lewes Road Bus Garage site is in SPZ 1, 2 and 3.  There is no mention in the policy wording regarding what this means and how this will be dealt with</p>
DP162	Environment Agency	AOB1	Due to time constraints, I have been unable to comment on the Sustainability Appraisal.
DP189	Natural England	H1 + H2	<p>H1  The following sites are within 500m of LNRs and as such consideration could be made regarding specific mitigation:  46-54 Old London Road, Patcham BN1 8XQ  Eastergate Road Garages, Moulsecoomb, Brighton, BN2 4PB</p> <p>H2  The following allocations are in close proximity to LNRs and as such careful consideration must be made regarding following the mitigation hierarchy and ensuring net gains are delivered:  Land at Ladies Mile. Carden Avenue  Land to north east of Coldean Lane / Land north of Varley Halls / Land south of Varley Halls  Land at South Downs Riding School &amp; Reservoir Site  Land north of Warren Road (Ingleside stables)</p>

## Appendix D The Selection and Rejection of Alternatives

This Appendix has been produced to meet Regulation 12 (2b): *The report shall identify, describe and evaluate the likely significant effects on the environment of: reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.*

This Appendix also contributes towards meeting Schedule 2 para 8: *“An outline of the reasons for selecting the alternatives dealt with”*; and Regulation 12 (2a): *The report shall identify, describe and evaluate the likely significant effects on the environment of: implementing the plan.* However, this information has mainly been provided in the actual assessments of the final policies.

National Planning Policy Guidance also states: *“The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan”.*

This Appendix includes an individual table for each policy, and provides links back to each stage of plan preparation when the policy, or alternatives to it, were assessed. Each table is presented in chronological order. It should be noted that options were considered at Draft City Plan Part Two stage and were not published separately.

### Key to stages of preparation

Options considered prior to draft policy stage	DRAFT18
Draft Policy City Plan Part Two June 2018	DRAFT18
Proposed Submission City Plan Part Two April 2020	PROPSUB20

<b>DM1 Housing Quality Choice and Mix</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
A1 No specific policy but rely on the NPPF	DRAFT18	Rejected. Although this option could have positive impacts for making the best use of land and economic development, it had mixed impacts for housing and health, as could result in lower quality housing, and had adverse impacts for equalities as may not enable the application of access and adaptability standards.
A2 Have individual policies in CPP2 covering the following separately: Housing Quality – addressing standards; Housing Choice; Housing Mix	DRAFT18	Rejected. There was little difference between option A2 and option A3 however this option was rejected to enable a more streamlined City Plan.
A3 Have a single policy in CPP2 covering housing quality, choice and mix	DRAFT18	Selected. Option has 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.
B1 Policy to require the provision of useable private outdoor amenity space in new residential development.	DRAFT18	Selected. This option was 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.
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.	DRAFT18	Rejected. No potential for adverse impact and but option could be inflexible and may restrict development.
Preferred Approach – A3 and B1.	DRAFT18	A combination of options A3 and B1. Policy should have significant positive impacts for housing and health, positive impacts for equalities, economic development and biodiversity. Recognised that the policy could have adverse impacts for objective concerned with making the best use of land as could result in larger units.
Preferred Approach – amendments include: Table 2 in policy replaced with government’s updated published version; clarification to supporting text - custom build/ self-build and reference to ecological and green infrastructure networks	PROPSUB20	Policy should have significant positive impacts for housing and health, positive impacts for equalities, economic development and biodiversity. Recognised that the policy could have adverse impacts for objective concerned with making the best use of land as could result in larger units.

<b>DM2 Retaining Housing and Residential Accommodation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Having no specific policy in CPP2	DRAFT18	Rejected. This option had potential for adverse impacts on key objectives including housing and health.
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.	DRAFT18	Selected. This option had greater potential for positive impacts than option 1, particularly on most relevant 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.
Preferred Approach – reflects option 2.	DRAFT18	Policy should have significant positive impacts for housing, positive impacts for heritage, access, best use of land and health.
Preferred Approach – no significant change to policy text from DRAFT18 stage.	PROPSUB20	Policy should have significant positive impacts for housing, positive impacts for heritage, access, best use of land and health.

<b>DM3 Residential conversions and the retention of smaller dwellings</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No policy in City Plan.	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, they were considered less significant than option 2.
2) Criteria based policy to assess residential conversions and the retention of smaller dwellings.	DRAFT18	Selected. Option has greater potential for more significant positive impact on the key objective for this policy area: provision of housing and may help to retain a good mix of sizes of dwellings through the protection of smaller dwellings. Option should also have positive impacts on health.
3) Incorporate issues regarding residential conversions into other policies, namely that which refer to National Space Standards (Housing Quality, Choice and Mix)	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing they were considered less significant than option 2.
Preferred Approach – option 3.	DRAFT18	Policy should have significant positive impacts for housing and making the best use of land and positive impacts for health, equalities, and heritage.
Preferred Approach - amendments include: Change which reduces the minimum floorspace needed, from 124sqm to 120sqm, to allow conversion into 2 or more units.	PROPSUB20	Policy should have significant positive impacts for housing and making the best use of land and positive impacts for health, equalities, and heritage.

<b>DM4 Housing and Accommodation for Older People</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on NPPF	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, health and equalities, lack of policy may result in opportunities to tackle older people's housing issues being lost.
2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing	DRAFT18	Selected. This option has greater potential for significant positive impacts for housing, health and equalities than other options.
3) Have a single policy in CPP2 covering older persons and specialist housing	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, health and equalities, one lengthy policy may result in less consideration of issues.
Preferred Approach	DRAFT18	Policy should have significant positive impacts for housing, health and equalities and positive impacts for open space, transport, air quality, access and community safety.
Preferred Approach – policy amended to reflect the identified need; requirement to provide internal and external communal space as appropriate; deletion of text requiring outdoor landscaped space; deletion of text allowing reduced housing standards where agreed; requirement for development to have regard to good design principles.	PROPSUB20	Policy should have significant positive impacts for housing, health and equalities and positive impacts for open space, transport, air quality, access and community safety.

<b>DM5 Supported Accommodation (Specialist and Vulnerable Needs)</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on NPPF	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, health and equalities, lack of policy may result in opportunities to tackle specialist housing issues being lost.
2) Have individual policies in CPP2 covering the following: older persons housing; and specialist housing	DRAFT18	Selected. This option has greater potential for significant positive impacts for housing, health and equalities than other options.
3) Have a single policy in CPP2 covering older persons and specialist housing	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, health and equalities, one lengthy policy may result in less consideration of issues.

Preferred Approach – option 2.	DRAFT18	Policy should have significant positive impacts for housing, health and equalities and positive impacts for open space, transport, air quality, access and community safety.
Preferred Approach - – amendments include: Policy still resists loss however sets out criteria whereby loss will be permitted, including surplus or the improvement of sub-standard accommodation.	PROPSUB20	Policy should have significant positive impacts for housing, health and equalities and positive impacts for open space, transport, air quality, access and community safety.

<b>DM6 Build to Rent Housing</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Don't include a build to rent policy in CPP2, but rely on emerging national guidance in draft NPPF and PPG.	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, health and equalities, these were not as significantly positive as option 3.
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).	DRAFT18	Rejected. Although this option had potential for various positive impacts, including for housing, health and equalities, these were not as significantly positive as option 3.
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)	DRAFT18	Selected. This option has greater potential for more significant positive impact for the housing, equalities and economic development objectives than other options.
Preferred Approach – option 3	DRAFT18	Policy should have significant positive impacts for housing, health and equalities, and positive impacts for transport and economic development.
Preferred Approach – amendments include: policy now reflects option 2 due to reduction in affordable housing sought, based on viability background evidence. deletion of criteria relating to avoiding an over-concentration of build to rent within strategic allocations; deletion of criteria that requires affordable to comply with CP20. Amendment to affordable housing criteria,	PROPSUB20	Despite reduction in proportion of affordable housing to be sought, policy should have significant positive impacts for housing, health and equalities, and positive impacts for transport and economic development, and should also enable viable schemes to come forward.

<p>confirming that up to 20% affordable at genuinely affordable rents will be sought subject to viability and subject to consideration of CP20.</p> <p>Updates to supporting text regarding rent levels and proportion of affordable housing.</p> <p>Updates to supporting text regarding viability background evidence undertaken.</p> <p>Updated cross-references to other policies in supporting text for clarity.</p>		
---	--	--

<b>DM7 Houses in Multiple Occupation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No additional policy relating to HMOs in CPP2 – rely on CPP1 Policy CP21, part (ii)	DRAFT18	Rejected. Although this option has positive impacts for best use of land, housing and equalities, the option does not show support for conversion back to C3 and could therefore miss opportunities to tackle other issues such as transport and noise, also having mixed impacts on health.
2) Policy seeking to protect existing HMOs and resist conversion to C3	DRAFT18	Rejected. Although this option had positive impacts for housing and equalities, this option had potential for various adverse impacts including making the best use of land, transport, noise and health.
3) Policy to support conversion of existing HMOs to C3.	DRAFT18	Selected. This option has the most potential for positive impacts, including for health and housing, as HMOs can still come forward, but supports conversion back to C3 where desired. This is considered to be the most flexible approach and will allow the market to respond. Acknowledged that HMOs provide an important source of low cost housing and widespread loss could result in increasing in-affordability having adverse equalities impacts, although this is based on a number of factors.
Preferred Approach – option 3	DRAFT18	Policy should have significant positive impacts for health, positive uncertain impacts for housing and equalities, positive impacts for transport, air quality, making the best use of land and access. Impacts on water quality, greenhouse gas emissions and waste all mixed, and impacts upon heritage mixed and uncertain. Uncertain impacts for economic development.
Preferred Approach - no significant change to policy text from DRAFT18 stage.	PROPSUB20	Policy should have significant positive impacts for health, positive uncertain impacts for housing and equalities, positive impacts for transport, air quality, making the best use of land and access. Impacts on water quality, greenhouse gas emissions and waste all mixed, and impacts upon heritage mixed and uncertain. Uncertain impacts for economic

development.

<b>DM8 Purpose Built Student Accommodation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA	DRAFT18	Rejected. This option was found to have mixed impacts for housing as although CPP1 contains 5 allocations for PBSA this is still not forecasted to meet demand and could have detrimental impact on C3 housing as the market through loss of housing to HMOs. All options were found to have potential for adverse impacts against some of the environmental site-based objectives.
2) Criteria based policy with no preferred sites identified	DRAFT18	Rejected. 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. Although this option was considered to offer greater flexibility and the ability to respond to changing markets when compared with Option 3, this approach was considered to lack certainty for developers with the risk that suitable sites would not come forward and continued reliance on the HMO market to meet students' housing needs.
3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.	DRAFT18	Selected. This option had the most potential for positive impacts across the greatest range of sustainability objectives, in particular for housing as it provides greater certainty, and also for access to services and making the best use of land. All options were found to have potential for adverse impacts against some of the environmental site-based objectives although this option 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 this option, however the greater certainty with option 3 should support development to come forward.
Preferred Approach	DRAFT18	Policy should have potential for significant positive impacts for transport, air/noise quality, and housing, positive impacts for best use of land, access, health, safety, and economic development. Policy could have adverse impacts on some site based objectives due to the preferred locations for PBSA.
Preferred Approach – amendments include: additional criterion clarification of communal space requirements; replacing requirement for	PROPSUB20	Policy should have potential for significant positive impacts for transport, air/noise quality, and housing, positive impacts for best use of land, access, health, safety, and economic development. Policy could have adverse impacts on some site based objectives due to the

'on-site' security presence with effective and 'appropriate' provision; removal of requirement for tenancy agreements to last full academic year.		preferred locations for PBSA.
---	--	-------------------------------

<b>DM9 Community Facilities</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)	DRAFT18	Rejected. Although this option could result in some positive impacts and could be more flexible, it could result in greater losses of community facilities and was found to have mixed impacts for access, health, community safety and social inclusion.
2) General policy to protect all community facilities (including pubs)	DRAFT18	Rejected. Although likely to result in positive impacts particularly for health, community safety and social inclusion, this wasn't as significantly positive as other options.
3) Specific policy to protect community facilities and additional specific policy to protect pubs	DRAFT18	Selected. Option 3 more likely to result in more significant positive impacts for health, community safety and social inclusion. More potential for positive impacts for reducing the need to travel and access compared with option 1.
Preferred Approach – option 3	DRAFT18	Policy should have significant positive impacts for transport, access and health and positive impacts for heritage, air quality, best use of land, community safety, equalities and economic development.
Preferred Approach – – amendments include: removal of 'improved' from policy as improvements would not be required to address policy; further clarification regarding when partial loss would be allowed.	PROPSUB20	Policy should have significant positive impacts for transport, access and health and positive impacts for heritage, air quality, best use of land, community safety, equalities and economic development.

<b>DM10 Public Houses</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No additional policy – rely on CPP1 policies (SA6, CP5 and other citywide policies)	DRAFT18	Rejected. Although this option could result in some positive impacts and could be more flexible, it could result in greater losses of community facilities and was found to have mixed impacts for access, health, community safety and social inclusion.
2) General policy to protect all community facilities (including pubs)	DRAFT18	Rejected. Although likely to result in positive impacts particularly for health, community safety and social inclusion, this wasn't as significantly positive as other options.
3) Specific policy to protect community facilities	DRAFT18	Selected. Option 3 more likely to result in more significant positive impacts for health,

and additional specific policy to protect pubs		community safety and social inclusion. More potential for positive impacts for reducing the need to travel and access compared with option 1.
Preferred Approach	DRAFT18	Policy should have significantly positive impacts for access and health, positive impacts for heritage, transport, best use of land, community safety, equalities and economic development.
Preferred Approach - no significant change to policy text from DRAFT18 stage; minor amendments to supporting text regarding viability and agent of change principle.	PROPSUB20	Policy should have significantly positive impacts for access and health, positive impacts for heritage, transport, best use of land, community safety, equalities and economic development.

<b>DM11 New Employment Floorspace</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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.	DRAFT18	Rejected. Although this option would result in similar impacts for key objectives, this was found to have mixed impacts on making the best use of land as may miss opportunities to make the best use of employment floorspace, e.g. through more flexible approaches.
2) Detailed development management policy to guide proposals containing new employment/ business floorspace.	DRAFT18	Selected. This option has potential for more significant positive impact than option 1 for some objectives, including ensuring the best use of land, and supporting long term economic growth as could further support flexible employment space.
Preferred Approach- option 2	DRAFT18	Policy should have significantly positive impacts for making the best use of land and economic development, positive impacts for health, equalities and waste, and mixed impacts for SDNP, transport and air/noise quality.
Preferred Approach – amendments include: clarification that part of policy also applies to B2 and B8 premises; simplification of policy wording around redevelopment for clarity, reference to zero-exhaust emissions infrastructure.	PROPSUB20	Policy should have significantly positive impacts for making the best use of land and economic development, positive impacts for health, equalities and waste, and mixed impacts for SDNP, transport and air/noise quality.

<b>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>

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	DRAFT18	Rejected. Although this option was the most flexible and could have positive impacts for making the best use of land, this option had mixed impacts on all other objectives.
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	DRAFT18	Selected. this option should have a significant positive impact on the key objective: economic development as 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.
3) Have a single policy to assess changes of use for all retail areas.	DRAFT18	Rejected. This option was found to have adverse impacts on economic development as would be unlikely to achieve an appropriate balance of uses in the different centres. Other impacts were uncertain.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for access and economic development, positive impacts for heritage, transport, air quality, health and equalities and mixed impacts for making the best use of land and community safety.
Preferred Approach – – amendments include: widening the range of possible changes of use; removal of the criteria seeking to avoid 3 or more non A1 uses other than in Lanes and North Laines; marketing requirement reduced to 6 months; allowing temporary/meanwhile uses. Clarification that residential uses would be permitted in some circumstances.	PROPSUB20	Policy should have significant positive impacts for access and economic development, and positive impacts for heritage, transport, air quality, making the best use of land, housing, health, community safety and equalities.

**DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units**

<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No policy framework to guide new and appropriate uses within ILPs, Neighbourhood Parades or individual shop units	DRAFT18	Rejected. Although this option should have positive impacts for economic development and is the most flexible approach, it could have adverse impacts on transport, air quality and access.
2) Criteria based policy to assess changes of use within ILPs, Neighbourhood Parades or individual shop unit	DRAFT18	Selected. Option 2 has the most potential for positive impacts, including significant impacts for best use of land, through ensuring a balanced mix of uses required in ILPs and NPs, and access to services as should enable local communities to meet their needs locally. Other positive impacts include transport, air quality and economic development.
3) Have a single policy in CPP2 covering all retail areas	DRAFT18	Rejected. A generic retail policy may result in a balance of uses, having access, transport and air quality benefits, but may not reflect the special nature of ILPs or NPs and miss the opportunity to secure more significant positive effects.
Preferred Approach – option 2.	DRAFT18	Policy should have significant positive impacts for access and economic development, positive impacts for heritage, transport, air quality, health and equalities and mixed impacts for making the best use of land and community safety.
Preferred Approach - amendments include: clarification that C3 would be allowed in certain circumstances; allowing temporary/meanwhile uses; removal of the word “retail” in relation to A1 units in supporting text; additional of additional local parade: omitted in error.	PROPSUB20	Policy should have significant positive impacts for access and economic development, positive impacts for heritage, transport, air quality, housing, health, making the best use of land, community safety and equalities.

**DM14 Commercial and Leisure Uses at Brighton Marina**

<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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 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	DRAFT18	Rejected. Although considered to be the most flexible approach, this could result in a predominance of uses and impacts would not be as positive for some objectives when compared with other options such as access to services and making the best use of land.

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)	DRAFT18	Selected. 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.
3) Have a single general policy in CPP2 covering retail frontage and changes of use	DRAFT18	Rejected. A generic policy is considered unlikely to reflect the special nature of the Marina area and impacts would not be as positive for some objectives when compared with other options such as access to services and making the best use of land.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for access and economic development, positive impacts for transport, making the best use of land, health and community safety.
Preferred Approach – amendments include: changed name of policy; more flexibility for changes of use to range of commercial and leisure uses to reflect existing range and mix of shopping, commercial and leisure offer; allows change of use to residential on upper floors.	PROPSUB20	Policy should have significant positive impacts for access and economic development, positive impacts for transport, making the best use of land, housing, health and community safety.

<b>DM15 Commercial and Leisure Uses on The Seafront</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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 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	DRAFT18	Rejected. Although considered to be the most flexible approach, this could result in a predominance of uses and impacts would not be as positive for some objectives when compared with other options such as access to services and making the best use of land.
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)	DRAFT18	Selected. This option should help deliver a range of uses that reflects the special nature of the seafront, should help to bring about a range of uses that will contribute towards ensuring people can meet their needs locally, may help to reduce the predominance in any one type of use increasing the attractiveness of the seafront as a destination, and should bring certainty for applicants.
3) Have a single general policy in CPP2 covering	DRAFT18	Rejected. A generic policy is considered unlikely to reflect the special nature of the

retail frontage and changes of use		seafront area and impacts would not be as positive for some objectives when compared with other options such as access to services and making the best use of land.
Preferred Approach – option 2.	DRAFT18	Policy should have significant positive impacts for economic development, positive impacts for open space, heritage, flood risk, access to services, making the best use of land, health and community safety. There could be adverse impacts on biodiversity, transport and air/noise quality.
Preferred Approach – change to policy name only.	PROPSUB20	Policy should have significant positive impacts for economic development, positive impacts for open space, heritage, flood risk, access to services, making the best use of land, health and community safety. There could be adverse impacts on biodiversity, transport and air/noise quality.

<b>DM16 Markets</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No policy framework to assess permanent market applications	DRAFT18	Rejected. Not having a policy framework may prevent this type of development from coming forward and therefore positive opportunities for economic development and health may not be realised.
2) Criteria based policy to assess new permanent markets or extensions to existing markets with no preferred sites identified	DRAFT18	Selected. Although both Options 2 and 3 performed equally well against a range of sustainability objectives, option 2 was selected as this was considered to be the more flexible approach.
3) Pro-active policy with appropriate permanent market sites identified	DRAFT18	Rejected. Although both Options 2 and 3 performed equally well against a range of sustainability objectives, with this option having potential for greater positive impact than option 2 on some site-based objectives, this option was rejected as was considered to be too prescriptive.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for access and economic development, positive impacts for transport, air quality, and health, and mixed impacts for heritage impacts depending on the site
Preferred Approach – – amendments include: further consideration of impact on cycle routes and requirement for cycle parking.	PROPSUB20	Policy should have significant positive impacts for access and economic development, positive impacts for transport, air quality, and health, and mixed impacts for heritage impacts depending on the site

**DM17 Opportunity Areas for new Hotels and Safeguarding Conference Facilities**

Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
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).	DRAFT18	Rejected. This option had some potential for adverse impacts, including for economic development as was not considered to reflect the findings of the Visitor Accommodation Study.
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	DRAFT18	Rejected. There was some uncertainty with this option, including for economic development, based on whether 10 sites could be found, as suggested in the Visitor Accommodation Study.
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	DRAFT18	Selected. This Option provides greater potential for positive impact, including for economic development as provides certainty to hotel developers, helps to make 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.
Preferred Approach – option 3	DRAFT18	Policy should have significant positive impacts for economic development, positive impacts for making the best use of land, community safety. Impacts on various site-based objectives varied.
Preferred Approach - amendments include: Removal of word 'suitable' for clarity; clarification of wording d) that allows loss where re-provision within a new development	PROPSUB20	Policy should have significant positive impacts for economic development, positive impacts for making the best use of land, community safety. Impacts on various site-based objectives varied.

<b>DM18 High quality design and places</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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)	DRAFT18	Rejected. Both options 1 and 2 resulted in similar significant positive impacts for the key objectives relating to this policy, and had more potential for positive impact on some of the environmental objectives due to the existing policy framework, however this option was rejected as it doesn't provide the opportunity to bring together guidance.
2) Progress Local Plan Policy QD1 and bring together guidance on place making into city-wide criteria-based policy	DRAFT18	Selected. Both options 1 and 2 resulted in similar significant positive impacts for the key objectives relating to this policy, including open space, heritage assets/townscape and health and similar positive impacts for other objectives including the SDNP. Option 2 chosen as this provided the opportunity to bring together various policy and guidance.
3) Place making issues incorporated into other policies, including those for allocated sites/development areas	DRAFT18	Rejected. There was more uncertainty with this option and although this option may result in beneficial impacts for allocated sites, may not provide adequate guidance for the rest of the city.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for the heritage and townscape, positive impacts for open space, SDNP, transport, health and community safety.
Preferred Approach - Reference to considering the circular economy principles added to policy. Simplification and reduction of supporting text to reflect further guidance will be provided in UDF, including references to strategic views and tall buildings being within the UDF. Additional supporting text to clarify that choice of materials should be low-maintenance, and that funded maintenance plans may be required.	PROPSUB20	Policy should have significant positive impacts for the heritage and townscape, positive impacts for open space, SDNP, transport, reducing greenhouse gas emissions, reducing waste, health and community safety.

<b>DM19 Maximising Development Potential</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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)	DRAFT18	Rejected. Although this option had potential for positive impacts, particularly on some environmental site based impacts, this option had potential for adverse impacts on making the best use of land which is the key objective to this policy area, as may not result in site potential being maximised.

2) Introduce into CPP2 a city-wide, criteria-based policy	DRAFT18	Selected. 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. Although the impacts for options 2 and 3 are broadly the same, in practice option 2 was considered to have greater potential for positive impacts where positive impact is predicted, as would provide guidance in a stand-alone policy that would be clearer.
3) Incorporate criteria into another CPP2 policy	DRAFT18	Rejected. 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. However, although the impacts for options 2 and 3 are broadly the same, option 2 was considered to have greater potential for positive impacts.
Preferred Approach – option 2.	DRAFT18	Policy should have significant positive impacts for making the best use of land, housing delivery and economic development, positive impacts for open space, waste reduction and access and mixed impacts for some site based objectives including biodiversity, heritage and SDNP as well as mixed impacts for health.
Preferred Approach - amendments include: wording added to clarify role of policy is to avoid underdevelopment of sites; policy text now refers to need to take account of SA4 and SA5	PROPSUB20	Policy should have significant positive impacts for making the best use of land, housing delivery and economic development, positive impacts for open space, SDNP, waste reduction and access and mixed impacts for some site based objectives including biodiversity, and heritage as well as mixed impacts for health.

<b>DM20 Protection of Amenity</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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).	DRAFT18	Rejected. Although this option was considered less restrictive, and this may help bring certain types of development come forward more easily having wider sustainability benefits, this had less potential for significant positive impact on the health objective which was key for this policy area.
2) Progress Local Plan Policy QD27 into city-wide criteria-based policy..	DRAFT18	Selected. 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.
3) Amenity issues incorporated into other policies, including those for allocated sites/development areas	DRAFT18	Rejected. This option did not perform better than any of the other options and had more uncertainty than other options.
Preferred Approach	DRAFT18	Policy should have significant positive impacts for health, positive impacts for community safety and adverse impacts for making the best use of land.
Preferred Approach - amendments include: policy	PROPSUB20	Policy should have significant positive impacts for health, positive impacts for community

clarifies that development should not cause 'unacceptable' loss; supporting text clarifies consultation should reflect SCI.		safety and adverse impacts for making the best use of land.
---	--	---

<b>DM21 Extensions and Alterations</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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.	DRAFT18	Rejected. This option was found to have mixed impacts for health and did not perform as well as other options for key objectives for this policy.
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)	DRAFT18	Selected. This option has potential for greater positive impact for some of more critical objectives for this topic area than other options including heritage/townscape and health and is the preferred 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).	DRAFT18	Rejected. Although this option had potential for some positive impacts, production of a SPD would not have the same weight as policy and therefore impacts would not be as positive as option 2.
Preferred Approach	DRAFT18	Policy should have positive impacts for the SDNP, heritage, water quality, greenhouse gas emissions, making the best use of land, housing, health and economic development.
Preferred Approach – amendments include: inclusion of consideration of 'scale'; various changes to supporting text to aid consideration of design, including inclusive design.	PROPSUB20	Policy should have positive impacts for the SDNP, heritage, water quality, greenhouse gas emissions, making the best use of land, housing, health, equalities and economic development.

<b>DM22 Landscape Design and Trees</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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	DRAFT18	Rejected. Although this option was found to have largely positive impacts, the option was considered less likely to result in significant positive impacts for biodiversity which is the key objective for this policy area.

Urban Design, CP13 Public Streets and Spaces, CP16 Open Space.		
2) One criteria based policy addressing landscape design and trees	DRAFT18	Selected. Option 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. Would provide opportunity to streamline City Plan.
3) Two policies in CPP2: one for landscape design and one for trees and hedgerows similar to the Local Plan.	DRAFT18	Rejected. Although this one performed similarly to option 2, this wouldn't help to streamline the City Plan.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for biodiversity, flood risk, climate change adaptation and health, and positive impacts for open space, SDNP, heritage, air quality, water quality and making the best use of land.
Preferred Approach – amendments include: changes to clarify need to retain, improve and where possible provide landscaping, trees or planting; inclusion of reference to natural capital; reference to planting of wildlife/ pollinator friendly non-native species; requirement for net gains in biodiversity and enhancements to green infrastructure.	PROPSUB20	Policy should have significant positive impacts for biodiversity, flood risk, climate change adaptation and health, and positive impacts for open space, SDNP, heritage, air quality, water quality and making the best use of land.

<b>DM23 Shop Fronts</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1	DRAFT18	Rejected. Although this option had various positive impacts, it did not have any impacts on economic development and may therefore miss the opportunity to support the retail economy.
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)	DRAFT18	Rejected. As with option 1, this option had various positive impacts. However, as this would result in guidance not policy, impacts weren't considered as positive as option 3 and 4.
3) Include policy wording on shop fronts and advertisements in the Place Making policy.	DRAFT18	Rejected. Although this option was found to have positive impacts on economic development, other impacts were uncertain as a generic policy may not adequately cover the special features of shop front design or advertisements in relation to many objectives.
4) Have a specific policy in CPP2 on Shop Fronts	DRAFT18	Selected. This option should have a significant positive impact on the key objectives for

and Advertisements supported by retained existing SPDs (SPD02 on Shop Front Design and SPD07 on Advertisements)		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.
Preferred Approach – option 4	DRAFT18	Policy should have significant positive impacts for heritage/townscape, and positive impacts for access, community safety, equalities and economic development.
Preferred Approach – amendments include: changes to clarify temporary security measures; simplification of wording regarding application to shopfronts in town centres; Additional text regarding the use of artificial lighting relating to highlighting heritage assets; deletion of unnecessary supporting text; cross reference to DM40 regarding avoiding light pollution	PROPSUB20	Policy should have significant positive impacts for heritage/townscape, and positive impacts for access, community safety, equalities and economic development.

<b>DM24 Advertisements</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP12 in CPP1	DRAFT18	Rejected. Rejected. Although this option had various positive impacts, it did not have any impacts on economic development and may therefore miss the opportunity to support various economies.
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)	DRAFT18	Rejected. As with option 1, this option had various positive impacts. However, as this would result in guidance not policy, impacts weren't considered as positive as option 3 and 4.
3) Include policy wording on shop fronts and advertisements in the Place Making policy.	DRAFT18	Rejected. Although this option was found to have positive impacts on economic development, other impacts were uncertain as a generic policy may not adequately cover the special features of shop front design or advertisements in relation to many objectives.
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)	DRAFT18	Selected. 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.
Preferred Approach – option 4	DRAFT18	Policy should have positive impacts for SDNP, heritage/townscape, community safety, and economic development.
Preferred Approach - Amendments to policy to require consideration of sounds or animation; clarify that adverts outside built up area must respect setting of South Downs National Park; Advertisements must not distract road users (strategic route network); Clarification/simplification of supporting text; Reference to geographical signage added to supporting text	PROPSUB20	Policy should have positive impacts for SDNP, heritage/townscape, health, community safety, and economic development.

<b>DM25 Communications Infrastructure</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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.	DRAFT18	Rejected. This option had potential for adverse impacts compared with the alternative approach, including site-based objectives.
2) Criteria based telecommunications policy	DRAFT18	Selected. This option 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, although this depends on the policy including certain criteria to address site specific matters.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, SDNP, access and economic development.
Preferred Approach – amendments include: remove duplication of policy requirements for satellite antenna; policy wording on digital connectivity amended to ensure policy is implementable; consequential amendments to supporting text, including consulting with those	PROPSUB20	Policy should have significant positive impacts for heritage/townscape and positive impacts for biodiversity, SDNP, access and economic development.

who have a visual interest in the development.		
--	--	--

<b>DM26 Conservation Areas</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) Have a single policy in CPP2 covering all types of heritage asset.	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
4) Have a specific policy in CPP2 on Conservation Areas	DRAFT18	Selected. This option had the potential for a stronger positive impacts 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.
Preferred Approach – option 4	DRAFT18	Policy should have significant positive impacts for heritage, positive impacts for biodiversity, opens space, SDNP, making the best use of land and economic development.
Preferred Approach - no changes to policy text, Reference in supporting text supporting contemporary and innovative design approaches and regarding conservation of traditional features on rear elevations.	PROPSUB20	Policy should have significant positive impacts for heritage, positive impacts for biodiversity , opens space, SDNP, making the best use of land and economic development.

<b>DM27 Listed Buildings</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) Have a single policy in CPP2 covering all types	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not

of heritage asset		perform as well as alternative options against the key objective for this policy area.
4) Have a specific policy in CPP2 on Listed Buildings	DRAFT18	Selected. This option 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.
Preferred Approach – option 4.	DRAFT18	Policy should have significant positive impacts for heritage and positive impacts for waste, making the best use of land, housing and economic development.
Preferred Approach – no changes to policy text	PROPSUB20	Policy should have significant positive impacts for heritage and positive impacts for waste, making the best use of land, housing and economic development.

<b>DM28 Locally Listed Heritage Assets</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) Have a single policy in CPP2 covering all types of heritage asset.	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
4) Have a specific policy in CPP2 on Locally Listed Heritage Assets	DRAFT18	Selected. This 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.
Preferred Approach – option 4.	DRAFT18	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, flood risk, climate change adaptation, best use of land, and health.
Preferred Approach - – amendments include: clarification that the potential for retention and reuse is to be explored in order for an informed and balanced judgement to be made.	PROPSUB20	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, flood risk, climate change adaptation, best use of land, and health.

<b>DM29 The Setting of Heritage Assets</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>

1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) Have a single policy in CPP2 covering all types of heritage asset.	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
4) Have a specific policy in CPP2 on The Setting of Heritage Assets	DRAFT18	Selected. This 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.
Preferred Approach – option 4	DRAFT18	Policy should have significant positive impacts for heritage, and positive impacts for SDNP and economic development. The policy could also have positive impacts for other site-based objectives including biodiversity, open space, flood risk and climate change adaptation although will depend on the setting.
Preferred Approach – no change to policy text.	PROPSUB20	Policy should have significant positive impacts for heritage, and positive impacts for SDNP and economic development. The policy could also have positive impacts for other site-based objectives including biodiversity, open space, flood risk and climate change adaptation although will depend on the setting.

<b>DM30 Registered Parks and Gardens</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) Have a single policy in CPP2 covering all types of heritage asset.	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
4) Have a specific policy in CPP2 on Registered Parks & Gardens		Selected. 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. In addition, this also had more significant positive impacts for open space.

Preferred Approach – option 4	DRAFT18	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, flood risk, climate change adaptation and health. Policy could also have positive impacts for best use of land and economic development through support for temporary uses.
Preferred Approach - amendments include: expectation that alternative, non-registered sites have been considered and assessed. Consequential changes to supporting text.	PROPSUB20	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, flood risk, climate change adaptation and health. Policy could also have positive impacts for best use of land and economic development through support for temporary uses.

<b>DM31 Archaeological Interest</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
2) No specific policy but rely on the NPPF and high level policy CP15 in CPP1 and put more detail in an SPD	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) Have a single policy in CPP2 covering all types of heritage asset.	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
4) Have a specific policy in CPP2 on Archaeological Sites and Monuments	DRAFT18	Selected. This option 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.
Preferred Approach –option 4	DRAFT18	Policy should have significant positive impacts on heritage, and positive impacts for open space, SDNP, best use of land, and economic development.
Preferred Approach –no changes	PROPSUB20	Policy should have significant positive impacts on heritage, and positive impacts for open space, SDNP, best use of land, and economic development.

<b>DM32 The Royal Pavilion Estate</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No specific policy but rely on the NPPF and high level policy CP15 in CPP1	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.

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	DRAFT18	Rejected. Although this option performed well against most relevant objectives, it did not perform as well as alternative options against the key objective for this policy area.
3) No site specific policy but rely on a combination of other policies in CPP2 covering the different types of heritage asset.	DRAFT18	Rejected. Although this option performed similarly to option 4, this option wouldn't allow for site specific considerations.
4) Have a specific policy in CPP2 on The Royal Pavilion Estate	DRAFT18	Selected. This option was considered to have greater potential for significant positive impact on open space and economic development. In addition, this option should lead to greater protection and conservation of the historic environment, as would allow more detailed site specific considerations.
Preferred Approach – option 4	DRAFT18	The policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, transport, access, health, community safety, equalities and economic development.
Preferred Approach - amendments include: clarification that proposals should be informed by adopted Conservation Plan; amendment to criteria to ensure a clutter free environment and net gains in biodiversity; new criterion that regard should be had to the impact of temporary events on planting and biodiversity.	PROPSUB20	The policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, transport, access, health, community safety, equalities and economic development.

<b>DM33 Safe, Sustainable and Active Travel</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No additional policy – rely on CPP1 Policy CP9	DRAFT18	Rejected. Although this option scored fairly similarly to option 2, this option did not score as well as the safety objective and may miss the opportunity to provide detailed policy that would improve safety.
2) Policy setting more detailed requirements regarding safe and sustainable/active travel	DRAFT18	Selected. This option 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 as option 1 across relevant objectives in this appraisal.
Preferred Approach – option 2	DRAFT18	The policy should have significant positive impacts for transport, air quality, health, equalities and community safety, positive impacts for greenhouse gas emissions, access

		and economic development, and uncertain impacts for open space and the SDNP.
Preferred Approach - amendments include: clarification on certain policy provision 1b); 2b) and 3b) apply 'where appropriate'; clarification that cycle parking provision should be universally accessible; additional wording regarding extending existing cycle networks.	PROPSUB20	The policy should have significant positive impacts for transport, air quality, health, equalities and community safety, positive impacts for greenhouse gas emissions, access and economic development, and uncertain impacts for open space and the SDNP.

<b>DM34 Transport Interchanges</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) General criteria based policy in support of developments	DRAFT18	Selected. This option is considered to offer greater flexibility and ability to respond to changing markets than option 2. It 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. Option could have various positive impacts for site-based objectives if specific site-based criteria are included.
2) Specific site allocations	DRAFT18	Rejected. Although this option 2 would result in more certainty over a number of site-based issues, this option is considered to be too restrictive and not flexible, and may result in allocated sites not being brought forward, not making the best use of land.
3) No policy	DRAFT18	Rejected. This option had potential for adverse impacts across various objectives, as lack of policy for this topic removes the opportunity to guide and direct development to the most suitable locations.
Preferred Approach – option 1	DRAFT18	The policy should have positive impacts for SDNP, heritage, air quality, greenhouse gas emissions, access, health, community safety, equalities, and economic development. Policy could have mixed impacts for transport and adverse uncertain impacts for on a number of site-based objectives and would depend on the site developed.
Preferred Approach – amendments include: minor wording changes to aid clarity of policy and inclusion of footnote referencing relevant government guidance and supporting text reference to evaluating impacts on designated sites, including SDNP, LGS and nature.	PROPSUB20	The policy should have positive impacts for biodiversity, open space, SDNP, heritage, air quality, greenhouse gas emissions, access, health, community safety, equalities, and economic development. Policy could have mixed impacts for transport and adverse uncertain impacts for on a number of site-based objectives and would depend on the site developed.

<b>DM35 Travel Plans and Transport Assessments</b>
--

Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
1) No additional policy – rely on CPP1 Policy CP9 (para 2c: major development required to submit a TA and implement agreed Travel Plans)	DRAFT18	Rejected. Although generally positive, this option had less potential for significant positive impacts on the key objectives for this topic area.
2) Policy regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans	DRAFT18	Selected. This option 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.
3) Guidance (e.g. SPD) regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans	DRAFT18	Rejected. Although generally positive, this option had less potential for significant positive impacts on the key objectives for this topic area.
Preferred Approach – option 2	DRAFT18	The policy should have significant positive impacts for transport, air/noise quality, and health, positive impacts for greenhouse gas emissions, making the best use of land, access, community safety and economic development and positive yet uncertain impacts for equalities.
Preferred Approach – policy amendments clarifying requirements for Transport Statements/ Transport Assessments in relation to Air Quality Management Areas to include consideration if development is outside AQMA; require proposals that cause significant noise/air quality impacts to submit a Construction and Environmental Management Plan; reference to impact of SRN to be considered in assessments in consultation with Highways England; amendment of wording from “should” to “to be required” relating to policy point 1 (all development which may result in significant movement); amendment of wording form “should” to “is required” relating to policy point 3 (major development in AQMA)	PROPSUB20	The policy should have significant positive impacts for transport, air/noise quality, and health, positive impacts for greenhouse gas emissions, making the best use of land, access, community safety and economic development and positive yet uncertain impacts for equalities.

**DM36 Parking and Servicing**

Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
--------------------------------	----------------------	---------------------------------

1) No additional policy – rely on CPP1 Policy CP9 and the Parking Standards SPD	DRAFT18	Rejected. Option 2 has more potential for significant positive impacts as the policy will have greater weight than the SPD.
2) Policy regarding the parking and servicing arrangements required to support new development (with standards from SPD set out in an Appendix)	DRAFT18	Selected. Although both options should have positive impacts, option 2 has more potential for significant positive impacts as the standards have greater weight when included within policy.
Preferred Approach – option 2	DRAFT18	The policy should have significant positive impacts for transport and air quality, positive impacts for greenhouse gas emissions, making the best use of land, access, health, community safety, equalities and economic development.
Preferred Approach – Amendments to policy regarding requirements for development to be permit-free where overspill parking may be an issue; New policy point in support of car-free residential development, with additional supporting text; Guidance in supporting text regarding parking surveys; Supporting text references changed to zero exhaust emissions vehicles from ultra-low emissions vehicles and supporting infrastructure.	PROPSUB20	The policy should have significant positive impacts for transport and air quality, positive impacts for greenhouse gas emissions, making the best use of land, access, health, community safety, equalities and economic development.

<b>DM37 Green Infrastructure and Nature Conservation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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).	DRAFT18	Rejected. All options have potential for positive impacts across related objectives, however this option had less potential for significant positive impact on key objectives for this topic.
2) One criteria based policy addressing the different nature conservation designations, species protection and Green Infrastructure	DRAFT18	Selected. All options have potential for positive impacts across related objectives. However this option has 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.

<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>	<p>DRAFT18</p>	<p>Rejected. This options scored the same as option 2, however was rejected as would not allow for a more streamlined plan.</p>
<p>Preferred Approach – option 2</p>	<p>DRAFT18</p>	<p>The policy should have significant positive impacts for biodiversity and open space, and positive impacts for air quality, water, flood risk and climate change adaptation, greenhouse gas emissions, SDNP and health.</p>
<p>Preferred Approach - Policy sections revised, with new sub-headings for “Green Infrastructure” and “Nature Conservation” to add clarity; GI to be integral to design and layout, and to achieve a variety of sustainability benefits; requirement for development to conserve and enhance, rather than protect and prevent damage to, features; also requires: net gains in biodiversity, protection of priority species/habitats; management secured; control of invasive species. Deletion of text “where possible”.</p> <p>Marine and coastal biodiversity, and geodiversity added to the list of features.</p> <p>Division of a) international, b) national, and c) local sites to aid clarity, with specific criteria which must be met for each including requirement for relevant assessments such as HRA or EIA. Clarity over criteria which does not apply to allocated local sites. All proposals must still ensure integrity of designations maintained, enhancement through management plans; and mitigation to result in net gains.</p> <p>Deletion requirement for greater reductions in CO2 emissions and improvements to public appreciation of the site.</p> <p>Consequential changes to supporting text to reflect policy changes, reference to swift bricks/boxes, further reference to the mitigation</p>	<p>PROPSUB20</p>	<p>The policy is considered to have significant positive impacts for the biodiversity objective, and positive impacts for air quality, water quality, flood risk, climate change adaptation and mitigation, making good use of land, SDNP, and health. Impacts on the open space objective are mixed. Although this is change from the previous assessment, this does not reflect the change in policy, but reflects greater consideration against the relevant SA objective.</p>

hierarchy, clarification of the provision of on-site mitigation where possible, and confirmation of update of Nature Conservation SPD.		
--	--	--

<b>DM38 Local Green Space</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No policy framework to designate Local Green Space (LGS) sites in the City Plan	DRAFT18	Rejected. Although this option should have positive impacts that are similar to option 2, due to existing CPP1 policy framework, impacts were not considered to be as significant on the key objective for this topic area, open space.
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.	DRAFT18	Selected. 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.
3) Policy designating all the sites promoted by more than one individual in response to the City Plan Part Two Scoping Paper.	DRAFT18	Rejected. This option did not score as well as other options as it was considered that this could unduly increase pressure on non-LGS designated sites.
Preferred Approach - option 2	DRAFT18	The policy should have significant positive impacts for open space, positive impacts for biodiversity, SDNP, heritage, flood risk, climate change adaptation and health. Impacts are uncertain for housing.
Preferred Approach - – amendments include: additional paragraph clarifying that development within an LGS will not be permitted unless there are very special circumstances where public benefits outweigh the harm; footnotes added to direct to NPPF policies regarding how development within LGS is managed and to provide examples of what constitutes an enhancement; Additional text to final policy paragraph reflecting the need for development to have met the very special circumstances test.	PROPSUB20	The policy should have significant positive impacts for open space, positive impacts for biodiversity, SDNP, heritage, flood risk, climate change adaptation, access, health and housing.

Supporting text amended to reflect the greater protection afforded to the designation; to clarify that development should be compatible with the designation; reference to the NPPF regarding the need for consistency with LGS designations and wider planning policy; additional text relating to provision of outdoor sports facilities at Benfield Valley.		
--	--	--

<b>DM39 Development on the Seafront</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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)	DRAFT18	Rejected. Although this option resulted in similar effects to option 2, this option did not have as much potential for significant positive impacts for some site based issues to be addresses, such as climate change adaptation and flood risk.
2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated	DRAFT18	Selected. This option 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. Site allocations may also have greater benefits for economic development, as could provide certainty for developers and may help to bring forward development.
3) Develop further guidance on development within the seafront through a masterplan/ SPD	DRAFT18	Rejected. Impacts similar to option 1. Production of an SPD would not result in as significant positive impacts as policy.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for flood risk, and climate change adaptation, and positive impacts for biodiversity, open space, access, health, equalities, best use of land and economic development. Policy could have adverse impacts on heritage.
Preferred Approach - amendments include: addition to criterion d) of access routes; reference in policy to Beachy Head West Marine Conservation Zone; additional supporting text referencing council work to improve access onto the beach; simplification of supporting text.	PROPSUB20	The policy should have significant positive impacts for biodiversity and open space, and positive impacts for air quality, water, flood risk and climate change adaptation, greenhouse gas emissions, SDNP and health.

**DM40 Protection of the Environment and Health – Pollution and Nuisance**

<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
A1)Detailed policy on transport/travel and air quality and noise issues	DRAFT18	Selected. This option had greater potential for more significant positive impact on the key objectives associated with this policy area: air and noise quality, and health than alternative approach.
A2)No additional policy – rely on Policy CP9 of the City Plan Part One:	DRAFT18	Rejected. Although this option scored positively against all relevant objectives, impacts were not considered as significant as option 1 on key objectives including air quality and health.
B1) No specific policy on light pollution. 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	DRAFT18	Rejected. Although this option scored positively against all relevant objectives, impacts were not considered as significant on key objectives as other options including for biodiversity, SDNP, and community safety.
B2) Have a single policy in CPP2 just covering lighting and floodlighting	DRAFT18	Rejected. Although this option scored positively against all relevant objectives including significant impacts for biodiversity, SDNP, and community safety, this option was not pursued as would miss the opportunity to streamline the plan.
B3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief	DRAFT18	Rejected. Although this option scored positively against all relevant objectives, impacts were not considered as significant on key objectives as other options, including for biodiversity, SDNP, and community safety, and there was concern that covering matters in brief would not provide enough detail.
B4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail	DRAFT18	Selected. This option had potential for a positive impact across a greater range of objectives than other options including significant positive impacts for key objectives. This option also provides the opportunity to streamline the plan.
Pollution and nuisance: 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	DRAFT18	Rejected. Although this option had potential for positive impacts, impacts were not as significant as other options on key objectives for this topic including SDNP, water quality, soil quality and health.
C2) Have a single policy in CPP2 just covering pollution and nuisance control	DRAFT18	Rejected. This option scored the same as option 4, and had potential for significant positive impacts against key objectives, however was not pursued as would miss the opportunity to streamline the plan.
C3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief	DRAFT18	Rejected. Although this option had potential for positive impacts, including significant positive impacts for health, impacts were uncertain as it was not clear how a brief policy could adequately cover issues.

C4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail	DRAFT18	Selected. This had option had potential for significant positive impacts for key objective. Although option C4 was considered more uncertain as the length of a policy could affect its usability and ultimately could affect how well the issue is addressed, however this would provide the opportunity to streamline the plan.
Preferred Approach (combination of A1, B4 and C4)	DRAFT18	Policy should have positive impacts for biodiversity, SDNP, air quality, water quality, soil quality, health and safety.
Preferred Approach – amendments include: Inclusion in criterion e) to prevent biomass combustion and CHP plants being incorporated in/near to the AQMA or sensitive receptors; and f) to consideration of impact of lighting on biodiversity in particular priority habitat and species; additional supporting text clarifying NPPF guidance regarding air pollutants should be addressed through all developments; schools added as an additional example of a sensitive receptor within supporting text	PROPSUB20	Policy should have significant positive impacts air quality, and positive impacts for biodiversity, SDNP, water quality, soil quality, health and safety. Although the policy now prevents certain low/zero carbon technologies from being incorporated in certain locations, this is not considered to have an adverse effect on objective concerned with reducing carbon emissions due to the other technologies available.

<b>DM41 Polluted sites, hazardous substances and land stability</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
A1) No specific policy on polluted land. Rely on NPPF and policies CP8 Sustainable Buildings, CP18 Healthy City and DA policies in CPP1 and provide detail in SPD	DRAFT18	Rejected. Although this scored positively against relevant objectives including water quality and soil quality, impacts were not as significant as other options.
A2) Have a single policy in CPP2 just covering polluted land buildings	DRAFT18	Rejected. This option scored the similarly as option A4, and had potential for significant positive impacts against key objectives including water quality and soil quality, however was not pursued as would miss the opportunity to streamline the plan.
A3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in overview/brief	DRAFT18	Rejected. Although this scored positively against relevant objectives, impacts were uncertain as it was not clear how a brief policy could adequately cover issues.
A4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters in detail	DRAFT18	Selected. This option had potential for significant positive impacts against key objectives for this subject matter including SDNP, air quality, water quality, soil quality and health. Although option A4 was considered more uncertain as the length of a policy could affect

		its usability and ultimately could affect how well the issue is addressed, however this would provide the opportunity to streamline the plan.
B1) No specific policy on Hazardous Substances. Rely on NPPF	DRAFT18	Rejected. Although this scored positively against relevant objectives, including biodiversity, water quality and soil quality, impacts were not as significant as other options.
B2) Have a single policy in CPP2 just covering hazardous substances and high pressure pipelines	DRAFT18	Rejected. This option scored similarly to option B4 and had the potential for significant positive impacts against key objectives including biodiversity, air quality, water quality and soil quality, however was not pursued as would miss the opportunity to streamline the plan.
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	DRAFT18	Rejected. Although this scored positively against relevant objectives, impacts were uncertain as it was not clear how a brief policy could adequately cover issues.
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.	DRAFT18	Selected. Options B2 and B 4 have the most potential for significant positive impact. However although option 4 considered more uncertain as the length of a policy could affect its usability this would provide the opportunity to streamline the plan. In addition, this policy was found to have more potential for significant positive health impacts.
C1) No specific policy on land stability. Rely on NPPF (paras 109-125), CPP1 SA1 The Seafront, and provide detail in SPD	DRAFT18	Rejected. Although this scored positively against relevant objectives, including making the best use of land and health, impacts were not as significant as other options.
C2) Have a single policy in CPP2 just covering land stability	DRAFT18	Rejected. Although this option had potential for significant positive impacts on health, it had no score against most objectives and wouldn't provide the opportunity to streamline the plan. This option scored the same as option C4, and had potential for significant positive impacts against key objectives, however was not pursued as would miss the opportunity to streamline the plan.
C3) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in overview/brief	DRAFT18	Rejected. Although this scored positively against relevant objectives, impacts were uncertain as it was not clear how a brief policy could adequately cover issues.
C4) Have a single policy in CPP2 covering all types of Pollution, Nuisance and Related Matters including land stability in detail	DRAFT18	Selected. Option has potential for a positive impact across a greater range of objectives than options C1 and C2 including potential for significant positive impact against the key objective for this topic including biodiversity, SDNP, air quality, water quality, soil quality, best use of land and health. C4 was chosen as it provided the opportunity to streamline the plan.
Preferred Approach (combination of A4, B4, C4)	DRAFT18	Policy should have significant positive impacts for making the best use of land, positive impacts for water quality, soil quality, biodiversity, health and housing and economic

		development.
Preferred Approach – amendments include: clarification that policy is seeking to protect natural capital and the quality of the environment.	PROPSUB20	Policy should have significant positive impacts for making the best use of land, positive impacts for water quality, soil quality, biodiversity, health and housing and economic development.

<b>DM42 Protecting the water environment</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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.	DRAFT18	Rejected. Although positive on all relevant objectives to this topic, including biodiversity, water quality, flood risk and health, this option may not have as great potential on the water quality objective due to less consideration of local circumstances.
2) Detailed development management policy that combines the policy issues of protection of water resources and water/ waste water infrastructure.	DRAFT18	Selected. 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.
Preferred Approach – option 2	DRAFT18	Policy should have significant positive impacts for water quality and positive impacts for biodiversity, flood risk and climate change adaptation, and health.
Preferred Approach – amendments include: inclusion reference to water ‘quantity’ in policy. Amendments to policy wording regarding phasing of waste water infrastructure to align with occupation of development and also streamline wording to avoid duplication.	PROPSUB20	Policy should have significant positive impacts for water quality and positive impacts for biodiversity, flood risk and climate change adaptation, and health.

<b>DM43 Sustainable Drainage</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No detailed development management policy framework to guide urban drainage solutions for new development instead rely on NPPF and City	DRAFT18	Rejected. Although this option had similar positive impacts, this option had less potential for significant positive impact on some objectives including biodiversity and provided less opportunity to include information on local circumstances.

Plan Part One policies (CP7 Infrastructure and Developer Contributions, CP8 Sustainable Buildings; CP11 Managing Flood Risk).		
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.	DRAFT18	Selected. 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.
Preferred Approach – option 2	DRAFT18	This policy should have significant positive impacts on water quality, flood risk and climate change adaptation and positive impacts for biodiversity, open space, SDNP, heritage, soil quality, best use of land and health.
Preferred Approach - Amendment to policy to: clarify that subterranean development if not permitted where other sources (in addition to groundwater) of flooding have occurred; clarify proposals should provide where possible improved biodiversity. Changes to supporting text to clarify certain types of SUDs more appropriate than others given aquifer.	PROPSUB20	This policy should have significant positive impacts on water quality, flood risk and climate change adaptation and positive impacts for biodiversity, open space, SDNP, heritage, soil quality, best use of land and health.

<b>DM44 Energy Efficiency and Renewables</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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).	DRAFT18	Rejected. Although positive, this option had less potential for significant positive impact on key objectives including greenhouse gas emissions, health and equalities.
2) Development management policy on Energy Efficiency and Renewables to guide application of energy policy for development.	DRAFT18	Selected. 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.
Preferred Approach – option 2	DRAFT18	This policy should have significant positive impacts for reducing greenhouse gas emissions and health, positive impacts for equalities and adverse but uncertain impacts on some objectives due to the potential impacts that certain renewable technologies can have, including biodiversity, noise quality, heritage and SDNP.
Preferred Approach - Policy amended to add flexibility for any future changes in building regulations. Inclusion of footnote; Additional policy paragraph to reflect council's ambition to become carbon neutral by 2030 and to encourage all to improve energy efficiency; Confirmation that technical guidance will be prepared to clarify expectation regarding Energy Statements; Clarifications in supporting text to some aspects of implementation; Supporting text wording amended to confirm council will reduce rather than mitigate carbon emissions; Further detail added regarding spending of funds gathered through carbon offset scheme; Additional supporting text reflecting policy wording and council ambition to become carbon neutral.	PROPSUB20	This policy should have significant positive impacts for reducing greenhouse gas emissions and health, positive impacts for equalities and adverse but uncertain impacts on some objectives due to the potential impacts that certain renewable technologies can have, including biodiversity, noise quality, heritage and SDNP.

<b>DM45 Community Energy</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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	DRAFT18	Rejected. Although this option resulted in similar positive impacts, this option as rejected as may not be as supportive of community energy schemes.
2) Development management policy on Community Energy to guide application of energy policy for development.	DRAFT18	Selected. 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. However 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.
Preferred Approach – option 2	DRAFT18	This policy should have significant positive impacts for greenhouse gas emissions, positive impacts for best use of land, equalities and economic development. Impacts on health were mixed due to the potential amenity impacts that certain renewable energy can have, and adverse impacts on some objectives, again due to the potential impacts that certain renewable technologies can have, including biodiversity, noise quality, heritage and SDNP.
Preferred Approach: no changes to policy, changes to supporting text to include reference to social value	PROPSUB20	This policy should have significant positive impacts for greenhouse gas emissions, positive impacts for best use of land, equalities and economic development. Impacts on health were mixed due to the potential amenity impacts that certain renewable energy can have, and adverse impacts on some objectives, again due to the potential impacts that certain renewable technologies can have, including biodiversity, noise quality, heritage and SDNP.

<b>DM46 Heating and cooling network infrastructure</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) No policy framework to manage standards for Communal and District Heating in the City Plan (CPP1/NPPF)	DRAFT18	Rejected. This option had less potential for significant positive impact on key objectives for this topic area including greenhouse gas emissions.
2) Criteria based policy to manage standards in Communal and District Heating in the City Plan	DRAFT18	Selected. 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.
3) Develop supplementary guidance on communal and district heating to provide more detailed guidance for the development of heat networks (SPD only)	DRAFT18	Rejected. This option had less potential for significant positive impact on key objectives for this topic area including greenhouse gas emissions.
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)	DRAFT18	Rejected. Although this option had similar positive impacts as option 2, the impacts were more uncertain based on the uncertainty of what the policy would address and what the SPD would address.
Preferred Approach – option 2	DRAFT18	This policy should have significant positive impacts on greenhouse gas emissions and positive impacts for heritage, waste and health. Impacts on air quality were adverse uncertain based on the potential for some CHP to have localised impacts.
Preferred Approach – Amend policy to require that proposals ‘must’ meet CHP Quality Assurance standards, and demonstrate suitability to a future connection and reference to low-carbon heat networks for clarification.	PROPSUB20	This policy should have significant positive impacts on greenhouse gas emissions and positive impacts for heritage, waste and health. Impacts on air quality were adverse uncertain based on the potential for some CHP to have localised impacts.

<b>SA7 Benfield Valley</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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)	DRAFT18	Rejected. This option had more potential for adverse impacts than other options, including for biodiversity, open space, heritage, transport, air quality, flood risk and best use of land.
Option 2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations	DRAFT18	Rejected. 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. However, with regards to this site, the site was considered to require a more detailed criteria-based policy.
Option 3) Bespoke criteria-based policies for each	DRAFT18	Selected. Both options 2 and 3 have merits as both will provide the opportunity to

urban fringe site allocated		include greater consideration of certain issues, particularly where there is background evidence to support this, for example biodiversity, landscape, heritage and archaeology. Option 3 was recommended to be pursued for this site due to the complexity of the sites and the need for this site to have a stand-alone policy.
Preferred Approach – option 3	DRAFT18	This policy should have significant positive impacts for housing, positive impacts for biodiversity, open space, heritage, waste, best use of land, access, health, community safety, equalities and economic development. Policy could have significant adverse impacts for landscape in the short term, significant adverse impacts for air/noise quality and mixed impacts for transport and climate change adaptation.
Preferred Approach: policy amended to include reference to enhancing wildlife connectivity and buffer zones; policy amended to encourage inclusion of older people's housing; paragraph added to supporting text to reflect ANA designation and potential for archaeology; and additional text to ensure PROW are protected.	PROPSUB20	This policy should have significant positive impacts for housing, positive impacts for biodiversity, open space, heritage, waste, best use of land, access, health, community safety, equalities and economic development. Policy could have significant adverse impacts for landscape in the short term, significant adverse impacts for air/noise quality and mixed impacts for transport and climate change adaptation.

## Strategic Mixed Use Site Allocations – SSA1-SSA4 and SSA7

All initial options for strategic mixed use site allocations were the same and therefore these policies are considered together.

<b>Strategic Mixed Use Site Allocations SSA1-SSA4 and SSA7</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Do not allocate sites for strategic mixed uses. Allow market to decide (e.g. amount, location and uses)	DRAFT18	Rejected. 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.
2) Have generic criteria-based policy allocating all strategic mixed use sites, with schedule of sites	DRAFT18	Rejected. Although the results this option was similar to option 3, this option had less potential for significant positive effects on some key objectives including making the best use of land, providing housing, access, health and economic development.
3) Have detailed policy for each site allocation setting out site specific considerations and opportunities which could be achieved on site	DRAFT18	Selected. This option 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.
<b>SSA1 Brighton General Hospital site, Elm Grove, Brighton</b>		
Preferred Approach – option 3.	DRAFT18	Policy has potential for significant positive impacts for housing and health, positive impacts for open space, heritage, flood risk, climate change adaptation, waste, best use of land, access, community safety, equalities and employment. Policy could have mixed impacts for transport and air quality.
Preferred Approach - – amendments include: requirement for Heritage Impact Assessment added; amendments to criterion a) regarding enhancing the most significant non-designated heritage assets; amendment to criterion b) regarding creation of openings in the wall, for	PROPSUB20	Policy has potential for significant positive impacts for housing and health, positive impacts for biodiversity, open space, heritage, flood risk, climate change adaptation, water quality, soil quality, waste, best use of land, access, community safety, equalities and employment. Policy could have mixed impacts for transport and air quality.

clarification; amendments to criterion c) regarding improving publicly accessible open space; f) and g) added to address waste water infrastructure requirements; criteria h) added to address site specific biodiversity and green infrastructure requirements (including swift colony). Consequential changes to supporting text.		
<b>SSA2 Combined Engineering Depot, New England Road, Brighton</b>		
Preferred Approach – option 3	DRAFT18	The policy was found to have potential for significant positive effects for the housing and employment objectives, positive effects for the biodiversity, open space, heritage, climate change adaptation, best use of land, access, health, community safety and equalities objectives and could have mixed adverse/positive impacts for the objectives for transport and air/noise quality and adverse impacts for waste.
Preferred Approach - – amendments include: clarification of criterion g) to enhance setting of nearby heritage assets; inclusion of criteria i) in relation to waste water infrastructure requirements; Inclusion in supporting text to potential for contaminated land.	PROPSUB20	The policy was found to have potential for significant positive effects for the housing and employment objectives, positive effects for the biodiversity, open space, heritage, climate change adaptation, water quality, soil quality, best use of land, access, health, community safety and equalities objectives and could have mixed adverse/positive impacts for the objectives for transport and air/noise quality and adverse impacts for waste.
<b>SSA3 Land at Lyon Close, Hove</b>		
Preferred Approach – option 3	DRAFT18	The policy was found to have potential for significant positive effects for the housing, health and access objectives, positive impacts for the open space, heritage (streetscape), climate change adaptation, community safety, best use of land, equalities and economic development objectives. Policy could have mixed adverse and positive impacts for the objectives for transport and air/noise quality and adverse impacts on flooding.
Preferred Approach – amendments include: addition to criterion d) in relation to biodiversity and green infrastructure requirements; Including of criterion h) and i) in relation to waste water infrastructure requirements; Inclusion in supporting text seeking SUDS and to potential for contaminated land and further guidance on design principles and nearby heritage assets.	PROPSUB20	The policy was found to have potential for significant positive effects for the housing, health and access objectives, positive impacts for the biodiversity, open space, heritage (streetscape), water quality, soil quality, flood risk, climate change adaptation, community safety, best use of land, equalities and economic development objectives. Policy could have mixed adverse and positive impacts for the objectives for transport and air/noise quality and adverse impacts on and waste.

<b>SSA4 Sackville Trading Estate, Hove</b>		
Preferred Approach – option 3	DRAFT18	The policy was found to have potential for significant positive effects for the housing, employment, best use of land and access objectives, positive impacts for the open space, water quality, soil quality, health, community safety and equalities objectives. The policy was found to have mixed adverse/positive impacts for the objectives for transport and air/noise quality and adverse impacts on flood risk and waste.
Preferred Approach – amendments include: amendment to criteria on air quality to strengthen requirements; Inclusion of criterion h) in relation to biodiversity and green infrastructure requirements; Including of criterion i) and j) in relation to waste water infrastructure requirements; Consequential amendments to supporting text and inclusion in supporting text to opportunities for SUDS and potential for contaminated land.	PROPSUB20	The policy was found to have potential for significant positive effects for the housing, employment, best use of land and access objectives, positive impacts for the biodiversity, open space, water quality, soil quality, flood risk, health, community safety and equalities and climate change adaptation objectives. The policy was found to have mixed adverse/positive impacts for the objectives for transport and air/noise quality and adverse impacts on waste.
<b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b>		
Preferred Approach – option 3.	DRAFT18	The policy was found to have potential for significant positive impacts for the economic development objective, positive impacts for the objectives for biodiversity, climate change adaptation, SDNP, heritage, sustainable transport, air quality, water quality, making the best use of land, access to services, health and equalities. The policy could have adverse impacts on the flood risk objective.
Preferred Approach – – amendments include: inclusion of ancillary uses within mix of uses allowed; clarification that proposals should enhance heritage assets and provide visual connectivity to the South Downs National Park; removal from criteria e) of specific examples of creative landscape solutions; Consequential amendment to supporting text to address the setting of the National Park, provide information on the sites location within a Groundwater Source Protection Zone, inclusion of SUDS and reference	PROPSUB20	The policy was found to have potential for significant positive impacts for the economic development objective, positive impacts for the objectives for biodiversity, climate change adaptation, SDNP, heritage, sustainable transport, air quality, water quality, flood risk, making the best use of land, access to services, health and equalities.

to ensuring performance of Falmer interchange.		
--	--	--

**Strategic Mixed Use Sites – Seafront Sites –SSA5 and SSA6**

<b>Strategic Mixed Use Sites – Seafront Sites –SSA5 and SSA6</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
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)	DRAFT18	Rejected. Although this option was found to have potential for a wide range of positive impacts, this option would not provide the opportunity to address any site specific impacts and therefore less potential for significant positive impacts including biodiversity, heritage, climate change adaptation and flood risk.
2) Detailed development management policy to guide development coming forward on the seafront and remaining development sites allocated	DRAFT18	Selected. 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.
3) Develop further guidance on development within the seafront through a masterplan/ SPD	DRAFT18	Rejected. Results were similar to option 1.
<b>SSA5 Madeira Terrace and Madeira Drive, Brighton</b>		
Preferred Approach – option 2	DRAFT18	The policy was found to have significant positive effects for the heritage, access and economic development objectives, positive effects 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. 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.
Preferred Approach – amendments include: Policy reference to refurbishment, restoration and revitalisation of terraces being a key council priority added; clarification on small/ boutique hotels; reference to cycling infrastructure added;	PROPSUB20	The policy was found to have significant positive effects for the biodiversity, heritage, access and economic development objectives, positive effects across all other relevant objectives including access to open space, transport, air/noise quality, flood risk, waste, best use of land, health, climate change adaptation, community safety and equalities.

Reference to event and shared space improvements; greater detail on biodiversity/ landscaping improvements, including reference to the Green Wall LWS; Consequential amendments to supporting text, including paragraph seeking SUDS; additional text clarifying funding available from the council for restoration.		
<b>SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive</b>		
Preferred Approach – option 2	DRAFT18	The policy was found to have positive impacts 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.
Preferred Approach - policy amended to clarify the main and ancillary uses permitted; additional criterion c) relating to density of development respecting the open character and allowing for sea views to be maintained; further detail on biodiversity improvements, including reference to the Volks Railway LWS. Consequential supporting text improvements. Supporting text added to clarify temporary consent granted for outdoor swimming pool on site	PROPSUB20	The policy was found to have significant positive impacts on biodiversity and economic development. The policy was found to have positive impacts across all other relevant objectives including open space, heritage, transport, noise quality, making the best use of land, access to services, health, and community safety.

<b>H1 Housing Sites and Mixed Use Sites (within BUA)</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Do not allocate any sites for housing. Rely on market to bring forward suitable sites.	DRAFT18	Rejected. Overall, Option 1 was found to be very flexible, however lacked certainty for developers and may inhibit overall housing delivery.
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.	DRAFT18	Rejected. Option 2 had greater potential for more significant positive impacts for housing delivery when compared with options 1 and 3, however this option was found to be too prescriptive and lacked flexibility, particularly for smaller sites.
3) Allocate sites in the SHLAA capable of delivering 10+ units, that do not have planning	DRAFT18	Selected. 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

<p>permission and those that have planning permission but have not commenced, that are deliverable within the plan period.</p>		<p>other options, including potential for positive impact for biodiversity, landscape, housing, best use of land, access, health and economic development.</p> <p>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.</p>
<p>Preferred Approach – option 3</p>	<p>DRAFT18</p>	<p>The policy was found to have potential for significant positive impacts for the housing objective, positive impacts for the equalities, making best use of land, community safety, transport, access, health, and climate change adaptation. Policy could have mixed impacts for economic development, biodiversity, soil quality, heritage, flood risk, air quality, greenhouse gas emissions and adverse impacts for waste. Impacts on open space, SDNP and water quality were found to be neutral.</p>
<p>Preferred Approach – amendments include:  Requirement for development on some sites to align with sewerage network reinforcement and/or for layout to allow future access to water infrastructure.  Additional supporting text highlighting the potential for contamination on some brownfield sites, and the need to protect groundwater resources when located within a GSPZ.  Table 5: Residential Site Allocations, and Table 6: Mixed Use Allocations: quantum updated for some sites to reflect recent planning consents or other evidence. 5 sites removed as now commenced; 2 sites removed due to availability; 2 new sites added.  Overall quantum total amended to 1,057 (residential) and 519 (mixed use) = total 1,576 (previously 1,609)</p>	<p>PROPSUB20</p>	<p>The policy was found to have potential for significant positive impacts for the housing , travel and access objectives, and positive impacts for the water quality, making best use of land, community safety, health, equalities and climate change adaptation objectives. Policy was found to have mixed impacts for economic development, biodiversity, heritage, flood risk, air quality, greenhouse gas emissions and soil quality. Impacts on waste were found to be adverse. Impacts on open space and the SDNP were found to be neutral.</p>

<b>H2 Housing sites – urban fringe</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
ALSO – SEE OPTIONS DISCUSSED UNDER H1 AS THESE ALSO APPLY		
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)	DRAFT18	Rejected. This option had more potential for adverse impacts, particularly on the site based objectives as would not provide the opportunity to specify any site-based considerations and development could still come forward in accordance with SA4.
2) General criteria based policy to assess all Urban Fringe sites allocated for housing development, with schedule of allocations with brief considerations	DRAFT18	<p>Selected for most sites. 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.</p> <p>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>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>
3) Bespoke criteria-based policies for each urban fringe site allocated	DRAFT18	Selected for one site. The site at Benfield Valley is specifically addressed by Policy SA7 due to its cross-cutting policy and delivery issues.
Preferred Approach – reflects option 2.	DRAFT18	Policy should have significant positive impacts for housing, positive impacts for greenhouse gas emissions, making the best use of land, community safety, and equalities, mixed impacts for access, health, biodiversity, open space, SDNP, air/noise quality, water quality, flood risk, and soil quality, and adverse impacts for transport and climate change adaptation. Many of the mixed impacts reflect the positive aspirations of the policy, but the on-site risks associated with development.
Clarification that the developable areas of the sites are allocated for housing. Cross references to SA4 and SA5 within policy text. Clarification that percentages for family housing are indicative.	PROPSUB20	Policy should have significant positive impacts for housing; positive impacts for water quality, reducing greenhouse gas emissions, making the best use of land, community safety and equalities; mixed impacts for transport/travel, access and health, biodiversity, open space, SDNP, heritage, air/noise quality, flood risk and climate change adaptation.

<p>New criteria d) requires adverse biodiversity impacts to be mitigated and net gains provided. New criteria e) requirements for sustainable transport infrastructure added; Criteria h) amended to reflect carbon neutral ambition encouraging development to achieve greater CP2 reductions; New criteria i) requiring self/custom built plots unless unviable; Explanation of additional criteria relating to phasing of development with sewerage network reinforcement and planning layout to ensure future access to water infrastructure.</p> <p>Table updated: some quantum amended; some clusters of sites split into two sites to reflect recent planning consents with consequential amendments to site area and quantum; key site consideration amended to reflect updated evidence.</p> <p>Supporting text amended to include further justification on the proportion of family housing to be sought; reference to seeking biodiversity net gains in site allocations; further explanation regarding energy efficiency; reference to design and materials reflecting the Integrated Landscape Character Assessment; reference to ecological survey requirements relating to designated biodiversity sites; reference to some sites being within GSPZ; reference to the potential for contamination on some sites; protect and enhance PROW</p>		<p>Many of the mixed impacts reflect the positive aspirations of the policy, but the on-site risks associated with development. Policy was found to have neutral impacts for soil quality, waste and economic development.</p>
--	--	--

<b>H3 Purpose Built Student Accommodation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Reliance on CPP1 Policy CP21 to provide the planning policy framework for PBSA	DRAFT18	Rejected. This option had greatest potential for adverse impacts as would not provide the opportunity to address any site specific considerations and does not provide any certainty to developers with regards to PBSA.
2) Criteria based policy with no preferred sites identified	DRAFT18	Rejected. Although this option 2 was considered to offer greater flexibility and the ability to respond to changing markets when compared with Option 3, 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.
3) Criteria based policy with additional appropriate sites identified as Strategic Allocations.	DRAFT18	Selected. 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.
Preferred Approach – option 3	DRAFT18	This policy should have significant positive impacts for housing, and positive impacts for transport, air quality, greenhouse gas emissions, best use of land, and access, mixed impacts for health and adverse impacts for water quality and flood risk.
Preferred Approach – amendments include: clarification of indicative numbers of bedspaces in policy wording and table; additional PBSA site allocated.	PROPSUB20	This policy should have significant positive impacts for housing and transport, positive impacts for air quality, greenhouse gas emissions, best use of land, and access, mixed impacts for health, climate change adaptation and soil quality, and adverse impacts for water quality, flood risk and waste.

<b>E1 Opportunity site for business and warehouse uses</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
1) Do not allocate new sites for employment uses. Allow market to decide.	DRAFT18	Rejected. This option had more potential for adverse impacts against a greater range of objectives, including the key objective for this topic area: employment.
2) Allocate new sites for employment uses	DRAFT18	Selected. Both options 2 and 3 had potential for positive impacts across similar objectives, and although option 3 was found to have greater potential for positive impacts for economic development due to certainty, this option was also pursued as had merit.
3) Bring forward employment allocations as part of Strategic Mixed Use sites	DRAFT18	Selected. This option 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.
Preferred Approach – option 3	DRAFT18	The policy should have significant positive impacts for economic development, positive impacts for waste, making the best use of land, health and equalities, adverse impacts for biodiversity, open space, SDNP, transport, flood risk and climate change adaptation, and mixed impacts for air/noise quality.
Preferred Approach –no change to policy; changes to supporting text recognising the LWS designated sites on part and adjacent to the site.	PROPSUB20	The policy should have significant positive impacts for economic development, positive impacts for waste, making the best use of land, health and equalities, adverse impacts for open space, SDNP, transport, flood risk and climate change adaptation, and mixed impacts for biodiversity and air/noise quality.

## Appendix E Likely effects without implementation of the plan

This Appendix contributes towards meeting Schedule 2 para 2: "... the likely evolution thereof without implementation of the plan or programme" by providing a summary of the assessment of the option of having "no plan/no policy" which were provided in full at options stage, reported in the Sustainability Appraisal at draft City Plan Part Two, 2018.

Tables 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	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	+
DM27	+?	0	0	+	0	0	0	0	+	0	0	+?	+	0	0	0	0	0	+
DM28	+?	+	0	+	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 and site allocation policy options

	1 biodiversit	2 open	3 SDNP	4 Heritage	5 Travel	6 Air/noise	7 Water	8 Flooding	9 Carbon	10 CC	11 Soil	12 Waste	13 Land use	14	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	--
Overall	-/+?	- /+ ?	-/+?	- /+?	-	- /+?	-/+	- /+ ?	+	- /+	?	-	-/+	- /+	- /+	-/+	-/+	0	-- /+ +

The cumulative effects of the no plan/policy option are generally fairly mixed and uncertain overall, or have limited effects where there could be opportunities for positive effects. The no plan scenario is more likely to result in:

- Lower levels of housing and employment coming forward due to no sites being allocated, particularly those providing larger schemes, increasing the risk of greater housing in-affordability and a constrained local economy, although potentially resulting in less environmental impacts related to an increased population
- Greater speculative development proposals on less suitable, more sensitive sites, or higher amounts of development being proposed on sites that are only considered suitable for a small amount
- Less opportunities to increase land use efficiency
- Less purpose built student accommodation, greater reliance on HMOs and an increase in concentration of HMOS in certain areas
- Lower quality of housing being delivered
- Loss of housing to other uses
- Less affordable rented housing
- Loss of community facilities and pubs to other uses
- Un-balanced mix of uses within retail centres
- Greater risk of having to travel further to access basic services, which could impact more significantly on those who cannot travel further, including older and younger people
- Lack of new hotels coming forward, impacting on the city's ability to meet tourist needs and attract new markets
- Less consideration of the relative importance of individual heritage assets and archaeology
- Less co-ordinated approach to sustainable transport infrastructure and improvements to access

- Less protection for nature conservation designated sites, particularly sites of local importance which are designated through the CPP2
- No Local Green Spaces designated
- No coordinated approach to development on special areas such as Madeira Terraces and Benfield Valley
- Less consideration of the potential for adverse impacts arising from development, including air and noise pollution, light pollution and other forms of pollution and nuisance
- Lower levels of energy efficiency and greater amounts of carbon emissions resulting from domestic properties sourced from conversions or changes of use

City Plan Part 2 provides more certainty and clarity, helps to address a number of potential issues, and provides the framework which should help to minimise adverse and maximise positive effects.

## Appendix F1 SA Site Assessments – H1 Allocated Sites

### 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. Former D use.
<b>Potential Use</b>	Approved planning application Bh2017/02681 to provide 93 C3 dwellings, through both conversion of buildings on school campus and new build on school playing field, as well as opening up privately owned open space of c1.4ha to become publically accessible.

<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, in accordance with the planning consent, will result in loss of c1.1ha of this open space, however it is recognised that the scheme will open up and improve the remaining open space for public use and includes a S106 contribution to compensate for the loss of the playing field which will support off-site open space improvements.
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, although recognised that retention and repair of these assets, as proposed by the approved scheme, would be beneficial. Heritage comments found that elements of the scheme would provide an enhancement to the Conservation Area when

		compared to existing 20 <sup>th</sup> century buildings on part of the site, however that development of the southern part of the site would harm 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.	++	Very good access to regular bus services. Shops, schools and opportunities for recreation all within walking distance.
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 providing 93 dwellings were subject to air quality assessment and were found to not have an effect on air quality at dwellings adjacent to the A259. 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 (3%) (around the school) has low risk of surface water flooding. Site within surface water conveyance zone. Groundwater levels at least 5m below surface. SFRA did not require any further consideration by sequential/exceptions test.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not in close proximity to a heat network cluster. Noted that the approved scheme does not include any low or zero carbon sources of energy.
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 in accordance with the planning consent will result in loss of some of the open space, which could adversely impact upon climate change adaptation. However some "greenfield" functions will be retained on site.
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 93 units on 1.96ha of the site 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 in accordance with the planning consent will help to facilitate adaptive re-use of some existing vacant buildings, and help bring them back into use. Development will also retain some of the greenfield functions associated with the playing fields.
14. To provide housing, including affordable housing, to contribute	++	Approved planning consent for 93 dwellings, which will include 40% affordable housing.

towards meeting local needs.		
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-being, and reduce inequalities in health.	+	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). 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 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	+	Planning consent includes delivery of 40% affordable housing, totalling 37 units. In addition, wheelchair accessible units will be provided. 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	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 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.  Potential adverse effects: Development of the site could raise issues with biodiversity/geodiversity as site includes some protected trees and may have potential for biodiversity due to open space on site. Development of site will result in loss of open space. Development could raise issues with heritage assets which are present on or adjacent to the site, including the Conservation Area, and archaeology. Site adjacent to AQMA and any traffic to/from the site

	<p>would need to travel through the AQMA, although air quality assessment dismissed any significant effect. Part of site suffers from high levels of road noise which may impact upon residential amenity which would need to be addressed through design. Site has small area at low risk of surface water flooding although SFRA considered site to be of overall low risk and did not require further consideration by the sequential/exception tests. 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:</p> <p>Development of the site would have positive impacts for housing, providing 93 dwellings including 37 affordable units. Development likely to involve further investigation and remediation of known areas of contaminated land, improving soil quality. Although provision of 93 dwellings would not meet CPP1 minimum density targets, development would involve conversion of some of the existing vacant buildings which helps to make the best use of land/resources as well as minimises waste.</p> <p>Development will retain some land providing natural/greenfield functions, and will include open space offering potential for community interaction and thus supporting community safety, SUDS and flood prevention measures having wider environmental benefits.</p> <p>Approved scheme will result in opening up of the retained open spaces for public use, thus increasing publically accessible open space. Approved scheme will bring vacant heritage assets back into use, supporting their long-term preservation.</p>
--	--

**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. Entire site comprised of the Cliff Road Paddock LWS.
<b>Site Area</b>	0.94ha
<b>Current Use</b>	Designated open space (natural/semi-natural typology)
<b>Potential use</b>	Potential to deliver 10 housing units. Site does not have a planning consent.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site is a recently designated LWS, designated for chalk grassland and reptile population. Some BAP species recorded on site. 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. Noted that the amount of development proposed has reduced since draft stage from 16 to 10 to reflect the ecological designation.
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, buildings and archaeological sites.	-	Site is not within or adjacent to any designated heritage assets, however is within the Roedean ANA and development could have impacts on archaeology.
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	++	Site not within a GSPZ.

(ecological, chemical and quantity status)		
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. Site is located within surface water conveyance zone.
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 10 units, this will provide a dwelling density of 11dph, less than the 50dph expected through CPP1 CP14. However, a low density scheme may be required to ensure that any impacts on biodiversity are mitigated appropriately, and 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 10 dwellings could be delivered on site. This should include 30% 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: 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/surface water flooding on site and groundwater levels are more than 5m below surface; 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: Development of the site could raise issues with biodiversity due to LWS designation and the greenfield nature of site although it is recognised that the amount of development proposed has been reduced to reflect this, 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: Development of the site would have positive impacts for housing. If 10 housing units are provided, this should include 30% affordable and the site may be suitable for family-type housing. Although delivery of 10 housing units would provide a site density of 11dph which is less than 50dph expected by CP14, this may be required to ensure that any biodiversity impacts are mitigated appropriately and 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 and flood prevention measures having wider environmental benefits. The site may provide opportunities to incorporate low/zero carbon infrastructure and development may provide employment/training for adjacent deprived communities.</p>

**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>	0.09
<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 dcbIs which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity)	++	Site not within 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. Small part of site has low risk of surface water flooding. Groundwater levels between 0.5m and 5m below ground surface therefore some risk, but not within two highest risk categories.
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 health.	+	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.
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. 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 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; 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. 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. Although some risk of surface water/groundwater flooding on site, SFRA considered risk to be low and did not need consideration by sequential/exception test. It is unknown whether the site has any potential for contamination.</p> <p>Potential positive effects:  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 :** 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 a LWS, 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)	++	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. No risk of surface water flooding. GW levels between 0.5m and 0.5m below ground surface however not in two highest risk categories.
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/SUDS.
11. To improve soil quality	+	Site may have potential for contamination 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	--	Site currently in employment uses. 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.

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 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; has no risk of surface water flooding; 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 ground water flooding however is not within the two highest risk categories of the SFRA, and did not require consideration by the sequential/exception test. 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 which could result in remediation of contaminated land. 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: 76-79 & 80 Buckingham Road, Brighton, BN1 1RJ**

<b>Site Description</b>	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 .
<b>Site Area</b>	0.13ha
<b>Current Use</b>	Vacant. Former D1 uses.
<b>Potential Use</b>	Approved application Bh2018/01137 to provide 34 dwellings and D1 floorspace through partial demolition of 80 Buckingham Road and conversion of 76-79 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. Extant planning permission 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 within extant planning consent. 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, in accordance with extant permission, 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: extant 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 in accordance with extant consent 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. Low risk of surface water flooding on 2% of site only. Groundwater levels at least 5m below surface. Site within surface water conveyance zone. Site considered to be low risk in SFRA.
9. To reduce emissions of greenhouse gases that cause climate change	+	No opportunity to connect to a heat network as outside cluster area. Extant 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 34 dwellings, a site density of 216dph would be achieved which meets CPP1 density requirements.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Extant planning consent given to provide a total 34 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 32 units. Of these, 14 will be affordable units (41%) and 2 wheelchair accessible units will be delivered as approved.
15. To improve the range, quality and accessibility to services and facilities.	++	The extant permission includes unit for D1 community use which would help increase access to this use. It is noted that extant consent 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 extant consent 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. Extant consent 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	++	Extant consent includes 41% 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 with consent. If extant consent 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 and groundwater levels more than 5m below surface; 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. Approved consent includes 34 dwellings including 14 affordable units and 2 wheelchair accessible units, also having positive equalities impacts. Delivery of 34 dwellings would provide a site density of 216dph 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</p>

		<p>the site would remove a building that is considered to be detrimental to the surrounding Conservation Area 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</p>
--	--	---

### 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 has surface water flood risk with 2% high risk, 25% medium risk and 87% low risk. More than 50% of site is within surface water accumulation zone. Site may have potential for groundwater flooding as GW levels between 0.5m and 5m below ground surface although not in two highest risk categories. SFRA required this site to be considered by the sequential/exception tests due to higher risk for SW flooding. 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 and accessibility to services and facilities.	++	Site redevelopment does not provide opportunity to increase services and will result in loss of D1 floorspace in 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. The site is not within a heat network cluster area and although approved scheme includes measures to improve</p>

	<p>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 and the SFRA recommended it should be considered further in the sequential/exceptions tests due to the higher risk.</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>
--	---

**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. Noted that the site is within 500m of a LNR, however the predicted quantum of housing is unlikely to have a significant effect on recreational pressure.
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 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 1,2 and 3.
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 no risk of surface water flooding and groundwater is located more than 5m below surface. SFRA considered site to be at low risk overall.
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	++	Site could provide 24 units of modular-type housing. BHCC has agreed to lease the site to YMCA, which will

affordable housing, to contribute towards meeting local needs.		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:</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 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; flood risk as has no risk of flooding and groundwater located more than 5m below surface; climate change adaptation as site entirely PDL; economy as development would not result in loss of employment land.</p> <p>Potential adverse effects:</p> <p>The site is within a GSPZ inner zone 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 is situated within a</p>

	<p>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 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 12 dwellings. May also have potential for other uses, e.g. B1 employment or D2 entertainment.

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 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. Site also within Little Laine ANA. 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 unlikely to generate change in average vehicle flow which would significantly impact upon air quality in this location (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. No risk of groundwater emergence.
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	++	Development of the site would provide the opportunity to make better use of a predominantly derelict site. If

available.		12 units of housing are delivered, this would give a site density of 200dph which exceeds density requirements in CPP1.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 12 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:</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; 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 and groundwater 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.</p> <p>Potential adverse effects:</p> <p>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</p>

	<p>to travel through the AQMA. 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 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. It is unknown whether the site has any potential for contamination.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 12 dwellings are provided this should include some affordable units and would equate to a site density of 200dph, 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>
--	---

**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 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 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 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. Medium risk of surface water flooding on 2% of site; low risk on 21% of site. GW levels between 0.5m and 5m below surface which poses risk of groundwater emergence. SFRA considered site to be of low flood risk overall and did not recommend require further consideration by the sequential/exceptions tests. 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.
<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 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. In addition the SFRA did not require further consideration by the sequential/exceptions tests.</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</p>

		employment/training opportunities for adjacent deprived communities.
--	--	--

**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>	10 dwellings. BH2018/02749 approved 12.09.19

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	0	PDL site which does not contain any nature conservation designations. Approved scheme does not include any features to enhance biodiversity.
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 to open space. Some communal open space is provided through approved 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 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. Setback of the additional storey was found to cause no harm to the nearby Conservation Area or St Bartholemew's Church listed 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, 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 in flood zone 1. No surface water on any of site. Groundwater levels between 0.5 and 5m therefore not in highest risk categories in SFRA.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within the New England Quarter Heat Network Cluster Area although approved scheme will not connect to a network. Conversion in accordance with approved scheme will include measures to improve fabric efficiency.
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. Approved scheme includes requirement for suitable sustainable drainage.
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 10 flats would achieve a density of 500dph which exceeds minimum density targets for Development Area locations.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Delivery of 10 dwellings would make a positive contribution to local housing need. Noted that the housing will be providing 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 10 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 economy increase employment opportunities and meet local employment needs.	-	Site is currently vacant. 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>	Largely positive	<p>The following summary is based on implementation of approved scheme with consent. If extant consent 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 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 no risk of surface water flooding however has a risk of groundwater flooding, although is not within the two highest risk categories of GW emergence and did not require consideration by the sequential/exception test. 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 10 units for people needing temporary accommodation, also having equalities benefits as these are likely to be vulnerable individuals possibly with protected characteristics. Delivery of 10 dwellings would provide a site density of 500dph 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. Redevelopment will include improvements to fabric efficiency. Development of the site</p>

		may also provide employment/training opportunities for adjacent deprived communities.
--	--	---

**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	++	Very good access to regular bus and rail services. Shops and health facilities within close walking distance.

car, encourage travel by sustainable forms of transport and improve travel choice.		
6. To reduce air and noise pollution.	--	<p>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> <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 exiting 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. No risk of groundwater flooding.
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	++	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

facilities.		within 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 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 extant 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 or groundwater 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>
--	--	--

**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, townscapes, buildings and archaeological sites.	++	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. 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	++	Very good access to regular bus services and train station. Shops, health and some other facilities all within

car, encourage travel by sustainable forms of transport and improve travel choice.		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. 59% of site has low risk of surface water flooding. GW levels between 0.5m and 5m below surface which could increase risk of groundwater emergence. SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests.
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,	+	Site easily accessible. Site situated within 30% most deprived SOA (crime domain).

and reduce crime and fear of crime.		
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 site has a low risk of surface water flooding and could be at risk of groundwater emergence although the SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests. 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 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</p>

		employment/training opportunities for adjacent deprived communities.
--	--	--

**SA site assessment: 2-16 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	++	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.

travel choice.		
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, 2 and 3.
8. To reduce the risk from all sources of flooding to and from development	-	PDL site. Small parts of site at risk of surface water flooding (3% medium; 4% low risk). Groundwater levels between 0.5m and 5m below surface and could be at risk of groundwater emergence. SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests.
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-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) 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,	++	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.	--	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, 2 and 3, and construction could pose a risk to water quality. Parts of the site have a risk of surface water flooding and could be at risk of groundwater flooding although SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests.. Development will result in net loss of employment land, even if 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 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 flatted 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</p>

		adjacent communities suffering from education/employment deprivation.
--	--	---

### SA site assessment: Outpatients Department, Royal Sussex County Hospital, Eastern Road

<b>Site Description</b>	Site comprises the outpatients department of the RSCH within a 1 storey building plus part two storey/roof-space. Located on Eastern Road and surrounded mainly by residential development, opposite the main hospital building.
<b>Site Area</b>	0.22ha
<b>Current Use</b>	D1 use – RSCH outpatients department
<b>Potential Use</b>	C3 – 35 dwellings

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	++	Predominantly PDL site which does not contain or is adjacent to any designated nature conservation sites of BAP habitats. Site has some green infrastructure on the edges of the site, including some trees. Redevelopment should ensure that there is nonet loss of green infrastructure. Site could have potential for nature conservation enhancement. Site is within 500m of an LNR which could be subject to increased recreational pressure.
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.	--	No heritage assets or archaeology on site. The south and west sides of the site immediately adjoin the East Cliff Conservation Area. Two listed buildings within fairly close proximity, including on Great College Street and Paston Place.
5. To reduce the need to travel by	++	Very good access to regular bus services. Shops within 230m of site and within walking distance. School also

car, encourage travel by sustainable forms of transport and improve travel choice.		within walking distance. Location on a sustainable transport corridor could provide the opportunity to provide car-free housing.
6. To reduce air and noise pollution.	--/+	Site located within AQMA. Redevelopment of site for housing unlikely to generate significant amount of traffic over which the site already generates through its use as an outpatients. Noise levels 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	+	PDL site. No risk of surface water flooding on site. Groundwater levels are more than 5m below ground surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within Eastern Road heat network opportunity area
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is predominantly PDL although has some trees on site. Redevelopment unlikely to exacerbate climate change issues. Redevelopment should ensure that there is no net loss of green infrastructure.
11. To improve soil quality	?	Unknown whether site could have potential for contamination based on current medical uses.
12. To minimise and sustainably manage waste	--	Redevelopment would not provide the opportunity to make use of any existing resources on site.
13. To make the best use of land available.	+	PDL site currently in use. Redevelopment providing 35 dwellings would provide a density of 159dph which would exceed density targets for development areas and make an efficient use of land available. Site in a tall building corridor.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 35 units would make a significant contribution to local housing need and should include 40% affordable: 14 units.
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 shops (230m) and primary schools (520m). Secondary schools and GP located more than preferred maximum.
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 shops (230m) and primary schools (520m). Secondary schools and GP located more than preferred maximum. The site could suffer from air 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. Site located in 10% least deprived (crime domain) although immediately adjacent to 10% most deprived crime domain.

18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, Site not located near to areas of employment/education deprivation, however 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.	0	Site identified for housing. Site not previously in employment land uses (B1-B8) although it is recognised that the current use provides jobs, however presumed that these will be provided within a consolidated RSCH.
<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 designated sites and contains limited biodiversity features; 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 some services; water quality as site not within GSPZ; road noise as does not suffer from road noise; flood risk as there is no risk of surface water flooding and groundwater levels more than 5m below surface; SFRA found overall flood risk to be low; climate change adaptation as redevelopment would not result in loss of open space or significant amounts of green infrastructure; access and health due to proximity to services; crime as not located within an area of high crime deprivation; and employment as would not result in loss of employment land.</p> <p>Potential adverse effects:</p> <p>Development of the site could raise issues with air quality as site within an AQMA, although it is unlikely that redevelopment of the site would result in a residual increase in traffic movements; and heritage as site adjacent to conservation area and in close proximity to heritage assets. 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>It is unknown whether the site may have potential for contamination.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing, with potential to provide 35 dwellings, which should include 14 affordable units, having positive equalities impacts. Delivery of 35 dwellings would provide a site density of 159dph which exceeds City Plan targets and would help to make effective use of land.</p> <p>Development should ensure no net loss of green infrastructure to ensure support for climate change adaptation and provide opportunities for nature conservation enhancement. Development located within a heat network opportunity area. Development on the site may also provide employment/training opportunities for adjacent deprived communities.</p>

**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>	Site has approved consent for demolition of existing building to provide 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. Site is within 500m from an LNR, however ecological comments confirmed the scheme would be unlikely to result in significant impacts.
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. Contribution sought towards improving proximate 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 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)	++	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. 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 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. Planning consent incorporates contribution towards the Local Employment Scheme and a commitment to use 20% local employment during construction phase.
19. To contribute towards the growth of a sustainable and diverse economy increase employment	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.

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 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 and groundwater levels more than 5m below site; 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 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</p>

**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 approved consent for 12 dwellings (BH2018/03600).

**Approved planning consent also considered within 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; does not contain nor is adjacent to any nature conservation designations and does not contain any BAP habitats. Redevelopment of the site does not appear to include any measures to improve ecology of 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	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 travel choice.	+	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.
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 on site. Groundwater levels more than 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate	++	The site is not within a heat network opportunity area. Planning approval includes solar PV which would support this objective.

change		
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 and will include landscaped area.
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 and although just under CPP1 density targets is still considered to make good use of the site and be reflective of its wider location.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Scheme approved would 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, and reduce crime and fear of crime.	++	Site is safely and easily accessible by limited amount of different transport modes. Development of site would 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. 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 in accordance with its planning consnet 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 of surface water flooding and groundwater levels more than 5m below surface; 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. 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. Approved scheme includes landscaping which would support climate change adaptation and solar PV. The site could provide employment/training opportunities for adjacent deprived communities.</p>
--	-------	--

**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 and could result in increased recreational pressure. Site comprises 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 a 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.	-	Site is not within or adjacent to or within the setting of any designated heritage assets. Site is within an archaeological notification area.
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 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 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 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). 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; 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 and groundwater levels more than 5m below surface; 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</p>

	<p>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. Site is designated as an Archaeological Notification Area. 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 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.</p>
--	--

### 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. Site is within 500m of an LNR which could be subject to increased recreational pressure.
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 within GSPZ 3.

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. Groundwater levels more than 5m below surface.
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	0	Development of site will not result in loss of employment land. Library services have been re-provided elsewhere in the neighbourhood.

opportunities and meet local employment needs.		
<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; flood risk as there is no risk of surface water flooding and groundwater levels more than 5m below surface; soil quality as site unlikely to be contaminated; climate change adaptation as redevelopment would not result in significant loss of open space or green infrastructure; 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. Site is within a GSPZ and could impact upon on water quality. 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 a 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>	Planning consent for mixed use development comprising 45 C3, synagogue, nursery, education, office floorspace and other uses (BH2018/02126).

**Approved application reflected in results.**

<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. Arboriculturalist comments indicate that some trees will be damaged by consented scheme. Consented scheme includes green wall, bird and bat boxes.
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 will 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 no known archaeological potential. Heritage comments on scheme suggested that loss of trees would have adverse impacts on the adjacent conservation area.
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 surface water flooding and no risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within a Heat Network Opportunity Area. Consented scheme includes some LZC and more efficient technologies including ground source heat pumps and communal heating.
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 will result in loss of some of this 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 45 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 45 dwellings would help to make good use of the site and contribute towards housing need. Deliver of 45 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.	+	Planning consent achieved for scheme with 45 units. The scheme does not comply with policy and only provides 5 affordable units, equivalent to 11%.
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). Development provides opportunity of increasing community interaction (provision of communal areas of open space within approved scheme).
18. To increase equality and social inclusion	+	Approved scheme only provides 11% affordable units, due to viability. 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 economy increase employment opportunities and meet local	0	Site identified for housing only. No employment land will be lost. Approved scheme includes nursery floorspace, which will replace existing.

employment needs.		
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development in accordance with consented scheme:</p> <p>No issues:</p> <p>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 surface or groundwater 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:</p> <p>Development of the site is likely to 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, particularly adjacent conservation area; climate change adaptation as development will 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:</p> <p>Development of the site will have positive impacts for housing. Consent to deliver 45 units, including 5 affordable. Delivery of 45 dwellings would provide a site density of 100dph which would help to make the best use of land and exceeds minimum density targets. Consented scheme includes some low/zero carbon technologies supporting climate change mitigation. Approved scheme includes some communal open space, which supports community interaction. 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 medium and low risk of surface water flooding on parts of site and scheme includes basement level parking. There is no risk of groundwater flooding. SFRA recommended the site be considered by the sequential/exceptions tests due to the proportion of the site in the surface water accumulation zone.
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 inclusion	+	Site will provide some affordable housing, although less than the CPP1 target. Some wheelchair accessible units 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	0	Site for residential uses only. Development of site will not result in loss of employment land.

economy increase employment 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: 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, part of site has risk of surface water flooding and the SFRA recommended the site should be considered by the sequential/exceptions tests.</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 169 dwellings (as per approved application BH2018/00868)

**Assessment based on assumption that approved scheme will be implemented, where possible/relevant.**

<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. Approved scheme required to enhance nature conservation value of the site.
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 of public open space nor increase in public open space. Approved scheme includes communal private areas of amenity greenspace. In addition, money secured through S106 towards improving open space in local area.
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 including the modern extension. Site situated within The Avenues Conservation Area. Site not within a ANA Approved scheme includes demolition of the modern extension to Kings House fronting Grand Avenue, considered to improve the setting of Kings House. Height of new building not considered to result in harm to Kings House or Conservation Area reflecting that the surrounding buildings are varied in design and scale. Overall, conversion of Kings House considered to sustain or enhance the heritage 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 is within walking distance of some services. Approved scheme includes 80 car parking spaces in underground car-park and 230 cycle parking spaces. Membership to car club also included, as are other measures to promote sustainable travel. 154 flats will not have entitlement to a residents parking permit.
6. To reduce air and noise pollution.	--	Site partially within AQMA. Site suffers from high levels of road noise. Restrictions on parking permits and availability of parking spaces to 15 flats only should ensure there is not significant increase in light vehicle movements over existing use.
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	--	Flooding incident recorded on site in 2014 (surface water). Some areas of low, medium and higher surface water flood risk on site. Groundwater levels between 0.025m and 0.5m below ground levels therefore high risk of groundwater flooding. SFRA indicates site at higher risk of flooding and that sequential and exception test should be undertaken in order to allocate this site due to the proportion of the site which has groundwater levels between the surface and 0.5m. Approved scheme includes measures which restrict surface water flow rates and includes pumping to deal with any flow into car parks.

9. To reduce emissions of greenhouse gases that cause climate change	++	Site not within a heat network opportunity area. Approved scheme includes CHP plant and communal heating. Approved scheme also includes solar PV. These measures help to reduce carbon emissions from the 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. Approved schemes includes some measures to support climate change adaptation, including those relating to surface water flooding, but none relating to increasing green infrastructure.
11. To improve soil quality	+	Chemical and gas identified in preliminary ground investigations report, which are required to remediated.
12. To minimise and sustainably manage waste	++	Site currently vacant. Redevelopment would facilitate the adaptive re-use of some of the building and therefore preserve resources and reduce production of waste, although recognised that some parts of building will be demolished.
13. To make the best use of land available.	++	Delivery of 169 dwellings would provide a site density of 325dph. 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 169 dwellings as per approved application. Approved scheme includes 28 units of affordable housing, representing 17% of total.
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. Approved scheme include some financial contributions towards education.
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	++	Approved scheme will result in 17% 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. S106 includes financial contribution towards Local Employment Scheme.
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>Mainly positive</p>	<p>The following summary is based on implementation of approved scheme with consent. If extant consent 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 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; 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 is subject to high levels of road noise, although the amount of development was found unlikely to result in an increase in vehicle movements over its existing use. The site is at risk of surface water flooding and higher risk of groundwater flooding and has suffered recent flooding events. Approved scheme incorporates measures such as pumps and reductions in run-off. The SFRA recommended site should be considered by the sequential/exception tests. Redevelopment of the site for housing would result in loss of significant amount of land formerly in employment uses.</p> <p>Positive effects: In accordance with approved scheme, development should sustain or enhance heritage assets, including the listed building and wider conservation area; will incorporate measures to reduce carbon emissions and support climate change mitigation; will result in delivery of 169 dwellings, including 28 affordable dwellings and will make good use of the site, providing a density of 325dph; will provide an opportunity to remediate any contaminated land; provides opportunities for nature conservation enhancement; incorporates communal amenity space and provides financial contribution to improving open space; includes measures to promote sustainable travel; incorporates measures to reduce surface water run-off; will facilitate adaptive reuse and preserve some resources through renovation of part of the building.</p>
---	------------------------	---

**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>	0.49ha
<b>Current Use</b>	B1 and open space
<b>Potential Use</b>	Potential for 37 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)	++	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 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/medium risk of surface water flood risk. Groundwater levels between 0.5m and 5m below surface and could be at risk of groundwater emergence. SFRA recommended sequential and exceptions tests should be undertaken for the site due to the higher risk due to the proportion of the site being in a surface water accumulation zone.
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's previous 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 37 dwellings would achieve a site density of 92dph 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 has potential for 37 dwellings 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.

<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>Redevelopment of site for housing would result in loss of land whose last use was B1 employment uses.</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 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:  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 and is of risk groundwater emergence. SFRA recommended the site should be considered through the sequential/exceptions tests.  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 could provide 37 dwellings all of which would be affordable rented provided through the New Homes for Neighbourhood scheme. Delivery of 37 dwellings would provide a site density of 92dph 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>

**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 has small area (5%) at low risk of surface water flooding. Groundwater levels at least 5m below surface. SFRA considered site to be of low flood risk overall. Site is greenfield and development of the site would result in an increase in urbanised form.
9. To reduce emissions of	-	Site not within a heat network opportunity area.

greenhouse gases that cause climate change		
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 towards meeting local needs.	+	Site could deliver 10 dwellings. This should include 30% affordable.
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. Small part of the site has a low risk of surface water flooding however the SFRA considered site to be of low flood risk overall. 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 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:</p> <p>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>
--	-------	--

**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 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 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. Small part of site has low risk of surface water flooding on site. No risk of groundwater flooding. SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests.
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.	+	Site in use. 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; groundwater 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 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</p>

	<p>occupier amenity. The site has a risk of surface water flooding although the SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests.. 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 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 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.</p>
--	--

#### 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	0	Site not within or adjacent to any designated heritage assets and has no known archaeological potential.

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.	++	Good access to a bus service with regular services. Good access and within walking distance of various services.
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 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.	+	Site is use. 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: 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 no surface water flood risk and groundwater levels are more than 5m below surface 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 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: 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: Royal Mail Sorting Office, 88 Denmark Villas, Hove**

<b>Site Description</b>	Site comprises the post office sorting/delivery office within an industrial style warehouse shed, with large area of hardstanding used for parking and access road. Located in a predominantly residential area, adjacent to the rail-line, with excellent sustainable transport links.
<b>Site Area</b>	0.6ha
<b>Current Use</b>	Sui generis use – post office sorting/delivery office
<b>Potential Use</b>	C3 – 67 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.	--	No heritage assets or archaeology on site. The south and west sides of the site immediately adjoin the Willett Estate and Hove Station Conservation Areas. Listed buildings within fairly close proximity including those relating to Hove Station, Ralli Hall and Cromwell Villas.
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 within 170m of site, GP within 510m of site and both within walking distance. Primary and Secondary schools also within walking distance. Location with good access to sustainable transport could provide opportunity for car-free housing.
6. To reduce air and noise pollution.	++/-	Site not within AQMA. Redevelopment of site for housing unlikely to generate significant amount of traffic over which the site already generates through its use as a delivery office. Noise levels from adjacent railways between 55-69dcbIs.
7. To improve water quality (ecological, chemical and quantity status)	-	Site within zones 2 and 3 of a GSPZ.

8. To reduce the risk from all sources of flooding to and from development	-	PDL site. Site entirely within Flood Zone 1. Low risk (1 in 1000yr event) of surface water flooding on 53% of site; medium risk on 4% of site. Groundwater levels are between 0.5 and 5m below ground surface therefore a risk of GW emergence but not within two highest risk categories.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site adjacent to Hove Station heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	++	Site is entirely PDL. Redevelopment unlikely to exacerbate climate change issues and could provide opportunities to support climate change adaptation.
11. To improve soil quality	+	Site contains underground fuel tanks which may result in contamination and therefore presents the opportunity for remediation if found.
12. To minimise and sustainably manage waste	--	Redevelopment would not provide the opportunity to make use of any existing resources on site.
13. To make the best use of land available.	+	PDL site currently in use. Redevelopment providing 67 dwellings would provide a density of 100dph which would meet density targets for development areas and make an efficient use of land available.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Delivery of 67 units would make a significant contribution to local housing need and should include 40% affordable: 26 units.
15. To improve the range, quality and accessibility to services and facilities.	++	The site has good access to all services. Services within desirable walking distance include shops (170m), primary schools (760m) and secondary schools (850m). GP (510m) and open space (760m) both located within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	The site has good access to all services. Services within desirable walking distance include shops (170m), primary schools (760m) and secondary schools (850m). GP (510m) and open space (760m) both located within acceptable walking distance. The site suffers from rail-noise 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. Site located in 50% least deprived (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing. Site located within 30% most deprived employment and education domains and could provide opportunities for training and employment of 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. Site not previously in employment land uses (B1-B8) although it is recognised that the current use provides jobs, however presumed that these will be provided elsewhere within the city.

<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 designated sites and contains no biodiversity features; 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 not within an AQMA; climate change adaptation as redevelopment would not result in loss of open space or any green infrastructure; access and health due to proximity to various services; crime as not located within an area of high crime deprivation; and employment as would not result in loss of employment land.</p> <p>Adverse effects: Development of the site could raise issues with heritage as site adjacent to conservation area and in close proximity to listed buildings. Site suffers from rail noise, which could impact on residential amenity. Site located within a GSPZ and could impact upon water quality. Although some risk of surface water and groundwater flooding on site, SFRA considered overall risk to be low and did not require consideration by sequential/exception test. 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, with potential to provide 67 dwellings, which should include 26 affordable units, also having positive equalities impacts. Delivery of 67 dwellings would provide a site density of 100dph and would help to make effective use of land. The site may have potential for contamination, which would require remediation and result in improved soil quality if found. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Development located within a heat network opportunity area and may provide the opportunity for climate change mitigation. Development on the site may also provide employment/training opportunities for locally deprived communities.</p>
---	--------------	--

**SA site assessment: Former Belgrave Centre, Clarendon Place, Portslade**

<p><b>Site Description</b></p>	<p>A brownfield site comprised of a former day-care centre and associated car-parking.</p>
<p><b>Site Area</b></p>	<p>0.25ha</p>
<p><b>Current Use</b></p>	<p>Vacant</p>
<p><b>Potential Use</b></p>	<p>Consent granted for 104 dwellings (BH2018/03629).</p>

**NB: consented scheme reflected in scoring where relevant**

<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. Approved scheme includes a green corridor fronting the A259 including trees. Conditions should secure other features such as bird/bat boxes.
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. Some private outdoor communal space is provided but does not meet the need it generates. Approved scheme includes financial contribution to improve open space and outdoor sports provision within the local area.
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. Approved scheme incorporates minimal car-parking; cycle-parking provision; car-club membership; bus season ticket and a financial contribution towards sustainable transport improvements. Concern that the scheme could result in over-spill parking within adjacent/nearby streets.
6. To reduce air and noise pollution.	--	Site within AQMA and suffers from high levels of road noise from adjacent A259. Travel plan aimed at encouraging reduction in private car ownership should ensure the development itself has a negligible effect on air quality but would not result in revocation of the AQMA. Development set-back from roadside which should ensure satisfactory level of air-quality in residential units.
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 surface water flooding. No risk of groundwater flooding on site. Conditions should secure onsite porous ground surfaces.

9. To reduce emissions of greenhouse gases that cause climate change	+	Site within Shoreham Harbour heat network opportunity area, however districting not proposed. Approved scheme include solar PV and fabric first approach undertaken.
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 green corridor, trees and porous ground surfacing.
11. To improve soil quality	+	Site investigation with planning application indicated moderate risk of contamination. Conditions to secure further assessment and remediation as appropriate.
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 416dph, making good use of land resources in the city.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site has approved planning consent to deliver 104 dwellings. These will be delivered through the Joint Venture scheme providing affordable housing.
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. Although site located within AQMA and suffers from road noise, measures incorporated within the design of the scheme should ensure that occupier amenity and health is not affected.
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. Communal areas also increase passive surveillance
18. To increase equality and social inclusion	++	Site should deliver affordable housing under Joint Venture scheme. 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. Financial contribution towards LES secured.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site will result in loss of land whose last use was B uses. However noted that the site is not currently in use.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Largely positive</p>	<p>(NB: the following is in accordance with the approved scheme):</p> <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 no risk of surface water flooding and no other flooding risks 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>Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA, although the travel plan measures were considered to promote sustainable transport with the scheme having an overall negligible effect on air quality. The site is subject to high levels of road noise. Air quality and noise could impact upon occupier amenity however measures incorporated within the design, including set-back from road and green corridor should result in satisfactory air and noise levels for residents. 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 whose previous use was employment, although it is recognised that the site is currently vacant.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing with approval for 104 dwellings, to be delivered as affordable units through the Joint Venture scheme. 104 dwellings equates to a site density of 416dph and would therefore make good use of land and bring back into use a vacant site. Approved scheme incorporate LZC technologies. Development in accordance with approved schemes incorporates measures that would provide opportunities for nature conservation enhancement including green infrastructure which also supports climate change adaptation. Approved scheme should result in measures to reduce risk of surface water flooding, also supporting climate change adaptation. Development should result in remediation of any contamination found on site, improving soil quality. Residential uses within the area could increase passive surveillance which can help to reduce the fear of crime. Financial contributions should secure improvements to open space, sustainable transport and local employment scheme, potentially supporting training for local people.</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 status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all	++	Site is PDL and of an existing urbanised form. No surface water or other flood risk on site. No risk of

sources of flooding to and from development		groundwater flooding.
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 economy increase employment opportunities and meet local employment needs.	--	Site will result in loss of land currently in B uses providing workspace for a range of businesses.

<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>
---	-------------------------------------	---

## Mixed Use Housing Site Allocations

### SA site assessment: GBMet 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 GBMET 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>	Mixed use scheme including student accommodation and C3 dwellings. Approved outline consent for 135 dwellings.

**Nb: planning consent taken reflected in 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 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.	+	No public open space on site. Approved scheme includes communal open, public square and 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	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 Grade I listed church which is a particularly prominent feature within the area due to its size. Parts of approved full planning scheme were considered to enhance the North Laine CA, such as redevelopment on the car-park site, and the new entrance from Redcross Street and should preserve the setting of the listed building at 96 Trafalgar Street. Outline: the demolition of York and Trafalgar buildings were accepted under previous planning consent; set-back building line considered to preserve view of St Bartholomew's Church; creation of view along Trafalgar Court considered to enhance North Laine CA. Some harm from outline scheme on setting of Valley Gardens CA due to modern development above a historic roofline.
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. Approved scheme includes 16 parking spaces proposed for 135 units, therefore delivers an element of low-car/car-free housing.
6. To reduce air and noise pollution.	--	Site within AQMA.

		Although uses and size of site is not considered to generate any additional vehicle trips, and may reduce trips which would be beneficial for air quality, however, one-way traffic on an upslope gradient may mean that the Cheapside continues to suffer from exceeded air quality. Parts of site also suffers from 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. Site has no risk of surface water flooding. Groundwater levels between 0.5 and 5m below surface which could increase risk of emergence. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.
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. Approved scheme includes solar PV array.
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 soft landscaping.
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 135 dwellings would provide a site density of 214dph.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Approved scheme for 135 dwellings, although it is noted that the outline consent does not include any 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. Conditions will ensure that noise and air quality do not impact upon future occupiers.
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.

		Extant consent provides opportunity of increasing community interaction (provision of community garden within approved scheme).
18. To increase equality and social inclusion	+	Approved scheme does not include any affordable housing. Site located within 20% most deprived SOA in both education and employment domain and could offer employment/skills opportunities and includes S106 contribution towards local employment scheme.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	Site not in employment use although provides a number of jobs. Although there will be net loss in education floorspace with approved scheme, GBMET states this will not result in any reduction in employment levels, due to rationalisation of floorspace.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>The following summary is based on implementation of approved scheme with consent. If extant consent 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 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; surface water flood risk, as no risk on site; 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: Site is within the AQMA and any traffic to/from the site would need to travel through the AQMA, although it is recognised that the redevelopment is not considered to increase vehicle generation above that already. Site has risk groundwater emergence although SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests. Development of site is unlikely to 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, with 135 dwellings proposed. Although none would be affordable, the scheme includes 6 wheelchair accessible units, having positive equalities impacts. In addition, this would provide a site density of 214dph and would be a good use of the land particularly the area that is currently used as a car park. The approved scheme was found to enhance the North Laine Conservation Area and enhance the view of Grade I listed buildings. The residential element of the scheme is partially car-free. Development will include green infrastructure which would support climate change</p>

		adaptation and provide opportunities for nature conservation enhancement. Development will incorporate solar PV supporting climate change mitigation. Provision of a community garden may provide opportunities for community interaction and supports community safety. Approved scheme includes some public open space. The site could provide employment/training opportunities for adjacent deprived communities from the Local Employment Scheme and will maintain employment for those at the college. Planning conditions should ensure that any noise impacts on health are addressed.
--	--	--

### 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

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 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	++	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.

forms of transport and improve travel choice.		
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 (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 surface water 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	++	Site capable of delivery 40% affordable housing. Site within 30% most deprived SOA (employment domain) and

inclusion		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.	++	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.
<b>Overall Summary and Policy Considerations</b>	Largely positive /no impacts	<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; 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 and groundwater levels more than 5m below surface; 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:</p> <p>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:</p> <p>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: 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 (sui generis)
<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. Small area at risk of surface water flooding. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.
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.

<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; 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 an small area at risk of groundwater flooding. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests. 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. 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.</p>
---	--------------	--

**SA site assessment: 27-31 Church Street, Brighton**

<p><b>Site Description</b></p>	<p>A brownfield site which has been cleared of all on-site buildings.</p>
<p><b>Site Area</b></p>	<p>0.12ha</p>
<p><b>Current Use</b></p>	<p>Derelict site</p>

<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).
----------------------	--

<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. 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 historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Site within the North Laine Conservation Area. Site within Brighton historic core ANA. 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 surface water on the site. Groundwater levels at least 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate	++	Site is within the Brighton Centre Heat Network Opportunity Area. Approved scheme includes incorporation of some LZC technologies.

change		
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 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 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	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; flood risk as site not at risk of tidal, fluvial or surface water flooding and groundwater levels more than

	<p>5m below surface; 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: 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 with 9 dwellings provided. This would equate 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.</p>
--	--

**SA site assessment: Former Dairy Crest Site, 35-39 The Droveaway, 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 BH2018/03798 approved.

<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 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.	-	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 and 3.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL. 14% of site has low risk and 35 has medium risk of surface water flooding. Groundwater levels more than 5m below ground level. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.
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	++	Site currently vacant. Redevelopment would facilitate the adaptive re-use of the majority of the building and

manage waste		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 towards meeting local needs.	+	Site has potential to deliver 14 dwellings. This should include 30% affordable dwellings (4).
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:</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; 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:</p>

	<p>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. Part of site has low risk of surface water flooding on site. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests. Site is not within a heat network opportunity area and opportunities to incorporate LZC technologies may be limited.</p> <p>Potential positive effects: 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>
--	---

**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)

<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	+	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

improve sustainable access to it.		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 2 and 3a, high risk of tidal flooding. There is risk of surface water flooding on small part of site. Groundwater levels between 0.5m and 5m below ground level which present 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. Site has also undergone sequential and exception tests as part of JAAP process and SFRA recommended further testing through sequential and exception tests.
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 available.	+	Delivery of 90 dwellings on site would provide a site dwelling density of 160dph. In addition, other uses would 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

	<p>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:  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 and site undergone sequential and exception tests as part of JAAP preparation. 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>
--	---

**SA site assessment: Prestwich House, 79 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

**Nb: approved planning consent on part of scheme reflected in scoring and commentary**

<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. Noted that approved scheme on part of site 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.	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. Approved scheme on part of site does not include private parking.
6. To reduce air and noise pollution.	--/+	Site within AQMA. The amount of development is unlikely to result in an increase in vehicle movements, over that already generated by the site, that would have a significant effect on air quality in this location. In addition, approved scheme on part of site does not include private car parking. The site does not suffer from road noise. Approved scheme includes the requirements to address sound issues by condition.
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. 4% of site has high risk of surface water flooding; 6% has medium risk; 7% has low risk. No groundwater flood risk on site.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within Shoreham Harbour heat network opportunity area. Approved scheme incorporates passive design techniques.
10. To increase the city's resilience	++	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further

and ability to adapt to climate change.		increase urbanised area of the city. Approved scheme on part of site will include a 105sqm green roof.
11. To improve soil quality	+	Site may have potential for contamination based on current uses and may offer opportunities for remediation. Desk top study carried out as part of application suggests that there may be contaminants.
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). Noted that the approved scheme provides 4 dwellings and B1 office floorspace.
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. The approved scheme includes B1 office floorspace.
<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; groundwater flood risk; 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. Parts of site have risk of surface water flooding, including high risk. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests. 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. Noted that the consent for part of the site will provide 4 units. Site would re-provide land in employment (B) uses, and would result in a net gain in B1 although a net loss on B2. Noted that the consent for part of the site includes B1 floorspace. Site could have potential for contamination based on contamination report and offers 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; noted that approved scheme includes a green roof. 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>
--	--	--

**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

<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 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 surface water or groundwater 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 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 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; flood risk as no risk of surface or groundwater flooding on site; 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 amount of development proposed for the site could result in an increase in traffic that may have a significant effect on air quality. Development of site will not provide the opportunity to minimise waste e.g. through</p>

	<p>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>
--	---

**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	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.	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. 5% of site has low risk and 3% has medium risk of surface water flooding. No risk of groundwater flooding. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.
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	++	Site has potential to deliver 45 dwellings. This should provide 40% affordable dwellings (18 units).

affordable housing, to contribute towards meeting local needs.		
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	<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; tidal or groundwater flood risk; climate change adaptation as site already entirely PDL; access and health due to proximity to services and potential to provide some D uses; 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 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. Small part of site has risk of surface water flooding.</p>

	<p>SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests. 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>
--	---

#### 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.

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	0	Site is within core urban area and is not visually prominent from the SDNP.

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 has no heritage designations on or adjacent to site, however a small part of the site 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 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 small areas of high surface water flood risk on site. (c<10%) No risk of groundwater 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 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>	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 does not contain any heritage 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 amount of development proposed for the site could result in an increase in traffic that may have a significant effect on air quality. Small part of site has risk of surface water flooding however site did not require consideration by the sequential/exception test; site suffers from road noise and is adjacent to the Harbour which could result in noise amenity issues; site is within an ANA. 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:</p> <p>Development of the site would have positive impacts for housing. If 25 dwellings are provided this should</p>

	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.
--	--

#### 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.

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 assets and their settings, townscapes, buildings and	0	Site has no heritage or archaeological designations on or adjacent to site.

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 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 surface water or groundwater flooding on site.
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 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 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 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:</p> <p>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>



## Appendix F2 SA Site Assessments - H2 Allocated Sites

### 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 LWS.
<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 LWS 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 travel choice.	-	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.
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 on site. Groundwater levels more than 5m below surface. The SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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.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	++	Site would provide 40% affordable housing. Site is within 40% most deprived (employment domain) and 20%

inclusion		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:</p> <p>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 and groundwater levels are more than 5m below the surface however it is noted that the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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:</p> <p>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. 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</p>

		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.
--	--	---

**SA site assessment: Sites 4 and 4a, Land at Mile Oak Road**

<b>Site Description</b>	A cluster of two privately owned site situated to the north of Mile Oak, adjacent to the A27. Sites comprises undesignated open space (countryside).
<b>Site Area</b>	2.31ha
<b>Current Use</b>	Used informally for recreation purposes, as well as for horse grazing.
<b>Potential Use</b>	70 dwellings across sites 4 and 4a.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	There are no nature conservation designations on the site, although is immediately adjacent to the LWS. Site is greenfield and UFA 2015 found these sites to contain semi-improved neutral grasslands and species poor hedgerow, which is LBAP habitat. Development could have impacts on adjacent designated site. Recommendations of UFA 2015 included enhancement of retained habitats and increasing robustness of LWS, as well as reduced overall yield in order to reduce likelihood of significant impact on biodiversity.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	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	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, although recommended that total yield would need to be reduced in order to minimise effects. Impacts considered to be neutral.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Part of the eastern part of the site is within the Mile Oak ANA. UFA2015 concluded that the sites have very high potential for archaeology, although unlikely to be of national significance. No other heritage issues.

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 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.	-	Site not within AQMA. Delivery of 70 houses will increase the average amount of vehicle movements to the area however noted that the air quality consultation comments for 125 units on adjacent sites 4b, 5 and 5a found impacts on the Portslade AQMA to be negligible. Parts of site suffer from high levels of road noise from the A27 which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	-	Site within flood zone 1. Some areas of high surface water flood risk along western edge of sites 4a. Groundwater levels vary; 0.5-5m below ground adjacent to the road, rising to >5m below ground on other parts of the site. SFRA considered overall flood risk to be low. Development across the site will result in urbanisation of a greenfield site.
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 greenfield in nature and unknown whether ecosystem services will be retained.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Greenfield site with no buildings on site which could be adapted/re-used.
13. To make the best use of land available.	+	Delivery of 70 dwellings equates to a density of 30dph. 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 affordable housing, to contribute towards meeting local needs.	++	Delivery of 70 dwellings would make a significant contribution towards housing need. Site should deliver 40% affordable units and could provide family type housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Site has good access to regular public transport. Local shop (200m), primary (730m) and secondary (1025m) schools all located within desirable walking distance; health services (730m) located within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in	++	Site has good access to regular public transport. Local shop (200m), primary (790m) and secondary (1025m) schools all located within desirable walking distance; health services (730m) located within acceptable walking

health.		distance. Although site will result in loss of open space that is used informally for recreation, it is noted that this is privately owned. 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.	++	Site situated within 10% least deprived SOA (crime) domain.
18. To increase equality and social inclusion	++	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	<p>Development of the site is unlikely to raise any issues with the following objectives: open space as majority of site is privately owned; heritage designations as there are none on site; landscape provided that 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> <p>Potential adverse effects:  Development of the site could raise issues biodiversity, particularly the adjacent LWS which would require increased robustness/improvement; 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 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 and groundwater levels between 0.5-5m and &gt;5m below the surface although it is acknowledged that the SFRA considered the overall risk of flooding to be low; climate change mitigation as site not within a heat network; climate change adaptation as development will result in urbanisation 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 70 housing units are provided, this should</p>

	include 40% affordable dwellings and the site should be suitable for family type housing. Although delivery of 70 units would only provide a site density of 31dph, 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.
--	---

**SA site assessment: Sites 4b, 5, and 5a, Land at Overdown Rise, Mile Oak**

<b>Site Description</b>	A cluster of 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 a LWS which covers site 5 and 5a.
<b>Site Area</b>	3.98ha (site allocation)
<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).

**NB: this assessment takes into consideration approved planning consent.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	Sites 5 and 5a comprise the Mile Oak Fields LWS 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 and concluded that yield put forward by UFA2014 should be reduced in order to minimise significant adverse effects. Approved scheme includes retention of 58% of LWS, 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. Overall effects therefore considered to be positive.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	Site (5a) is privately owned designated open space (natural/semi-natural). The remainder of the site is not designated. No development is planned for site 5a, which will be retained in open space uses in accordance with the planning consent. 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 LWS on site 5 and 5a, and also through site 4b, which should improve access 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 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.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	There are no designated heritage assets on or adjacent to the site. 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 and recorded or preserved in situ.
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 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.	-	Site not within AQMA. Delivery of 125 houses will increase the average amount of vehicle movements to the area however, 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. All of the site suffers from high levels of road noise from the A27 which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	+	Site within flood zone 1. No risk of surface water flooding on the allocated site. Groundwater levels >5m below surface. Development across the site will result in urbanisation of a greenfield site. Noted that the approved scheme includes some attenuation ponds. SFRA found the overall risk of flooding to be low.
9. To reduce emissions of greenhouse gases that cause climate change	-	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.	-	Site is greenfield in nature, however a large proportion of the cluster of sites will remain undeveloped and will therefore retains some greenfield functions/ecosystem services.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Greenfield site with no buildings on site which could be adapted/re-used.
13. To make the best use of land available.	+	Delivery of 125 dwellings 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 affordable housing, to contribute towards meeting local needs.	++	Delivery of 125 dwellings would make a significant contribution towards housing need. 50 of the 125 dwellings approved will be affordable (40%).
15. To improve the range, quality and accessibility to services and facilities.	++	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.	++	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.	++	Site situated within 10% least deprived SOA (crime) domain.
18. To increase equality and social inclusion	++	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.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</p>	<p>Development of the site (in accordance with the planning approval for 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 LWS 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; soil quality as site not known to be contaminated; there is little surface water flood risk on site, groundwater levels are more than 5m below surface, however the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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> <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 the site is subject to road noise which could impact upon occupier amenity; water quality as site within GSPZ 1; 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. Approved scheme includes 125 housing units of which 40% affordable dwellings and the site should be suitable for family type housing. Although delivery of 125 units would only provide a site density of 31dph, 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 LWS and elsewhere.</p>
---	--------------	--

## 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 a LWS. 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 foot-golf course
<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 LWS, 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. Wider site has small areas at risk of surface water flooding, although not on the areas allocated for development. Groundwater levels between 0.5m and 5m below ground surface on all of the area allocated for development which are not within the highest risk categories for groundwater emergence. SFRA found overall flood risk to be 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 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:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: water quality as site located outside a GSPZ; surface water flood risk as no risk on allocated sites; 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:</p> <p>Development of the site could raise issues with biodiversity as site is a LWS 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; groundwater levels are between 0.5m-5m below surface although it is recognised that the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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 a development of more than 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 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</p>

		<p>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 remainder 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>
--	--	---

**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 (entire site)
<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 contains an LWS (Patcham Court Field). Site adjacent to Braeside Avenue LWS.
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 access to it.	-	The site is separated from the SDNP by the A27 and the slopes to the east and west have some landscape sensitivity as are inter-visible 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 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	--	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.

archaeological sites.		
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 dcblls 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, however immediately adjacent there is a high risk (1 in 30 year event )of flooding on part of the area that forms the outdoor sports pitch, with susceptibility to ponding. Development on the allocated site could increase flood risk to this area due to the increase in urbanised form and conveyance. Groundwater levels between 0.025m and 5m below surface which poses a high risk of groundwater flooding. SFRA suggests it should be subject to sequential and exceptions test due to the proportion of the site with groundwater levels between the surface and 0.5m 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 (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 a LWS; 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</p>

	<p>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 itself is not at risk of surface water flooding, it is adjacent to an area with high flood risk from surface water and could increase the risk of flooding due to change in form to one of a more urbanised nature. Site also has risk of groundwater flooding due to levels being between 0.025-0.5m below surface and SFRA indicated that the sequential and exceptions test would be needed to demonstrate site is suitable for allocation due to higher risk.</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>
--	--

**SA site assessment: Urban Fringe Site 17, Land at Ladies Mile, Patcham**

<b>Site Description</b>	Publicly 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

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Part of the wider urban fringe site comprises the Ladies Mile LNR which includes areas of semi-improved calcareous grassland. The allocated site, which forms approximately 9% of the wider site is not within the LNR, although is in close proximity. 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. The site is greenfield in nature and could have potential for biodiversity.
2. To protect and improve open space and green infrastructure and	--	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.

improve sustainable access to it.		
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 dcbIs 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. No risk has of surface water flooding. Groundwater levels 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 (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 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: air quality as site is located outside the AQMA; designated heritage assets; soil quality as site unlikely to be contaminated; flood risk as there is no surface water flood risk on site, and groundwater levels are more than 5m below surface and it is noted that the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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>Potential adverse effects:  Development of the site could raise issues with biodiversity due to close proximity to the 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:  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: Site 21, land to the north east of Coldean Lane, Coldean, Brighton**

<b>Site Description</b>	Site is designated as natural/semi-natural open space and countryside. Site located within the area that lies between the A27 and Coldean Lane, to the north west of the Varley Halls student accommodation.
<b>Site Area</b>	1.78ha (area of potential as per UFFA)
<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>	242 dwellings (as per approved planning consent). Dwellings would be delivered as part of the Joint Venture between BHCC and Hyde New Homes to deliver affordable homes.

NB: approved scheme also taken into consideration with scoring.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-/+	<p>Site located within Land at Coldean Lane Local Wildlife Site designated for ancient woodland and chalk grassland.</p> <p>UFA 2015 found semi-improved neutral grassland habitats on parts of the site and broadleaved woodland which is a local BAP habitat.</p> <p>Ecological reports submitted with application indicates presence of species, including badger setts, with measures being taken to ensure protection of main sett. Reptile receptor site within wider site also proposed.</p> <p>Loss of 0.13ha of woodland was found to be acceptable due to commitment to bring remaining 0.94ha of woodland back into positive management. Proposal also includes establishment of 1.6ha of calcareous grassland to compensate for loss of 0.97ha of mixed quality grassland. Other conditions should ensure that impacts on other species are avoided.</p>
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	++	<p>The allocated area does not contain any designated open space, although it is recognised that the site is used for recreation purposes. Approved scheme include open space/play/amenity space which will be publically accessible, therefore increasing provision of publically accessible open space. Approved scheme also includes financial contribution to improving off site open space.</p>
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	+	<p>Site 21 is adjacent to the SDNP. However, landscape qualities of the site are already compromised by urbanising influencing, such as the A27 and presence of existing housing across Coldean Lane. Great Wood of Stanmer Park screens the site from the SDNP. UFA 2015 indicated that landscape effects of development on site 21 would be minimal provided development does no break the wooded tree line of the Great Wood in Stanmer Park.</p> <p>County landscape architect found impacts to be acceptable; the design was influenced by a landscape-led approach and proposals will increase access across the site to Stanmer Park.</p>
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	<p>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.</p> <p>Although the site is situated within Stanmer Park estate Historic Park &amp; Garden, it is separated from the main focus of the estate by the A27 and the Varley Halls development, therefore a significant negative effect is not attributed. However heritage comments on the proposal objected to the scale of the building which would harm views from heritage assets including the registered park and garden and Hollingbury Hillfort.</p> <p>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 21, however situated on the other side of the A27.</p>
5. To reduce the need to travel by car, encourage travel by sustainable	-/+	<p>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</p>

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. Approved scheme includes measures to reduce transport impacts and includes financial contribution towards sustainable transport initiatives.
6. To reduce air and noise pollution.	--	Site outside the AQMA. Delivery of 242 dwellings, with 162 car park spaces will increase the average amount of vehicle movements to the area, however environmental health satisfied that air quality will not be adversely effected by the development. Site suffers from road noise from the A27 of between 55-64 dcbIs which could impact upon occupier amenity; environmental health proposed measures to reduce noise impacts.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 2/3.
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 below surface. Approved scheme include SUDS and porous car-park paving.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area. Approved scheme includes connections for future district heating network, should one become available but on site measures to reduce carbon emissions, beyond policy requirements were ruled out on various grounds.
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 greenfield functions. Approved scheme includes SUDS and food growing areas, however other features such as green roofs and green walls were ruled out based on viability of providing a 100% affordable scheme.
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 c.135dph would be delivered on site 21 and meets CPP1 density targets. Site is greenfield and would permitted schemes allows 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 242 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 of site being retained in open space uses, and approved scheme will increase provision of various typologies of publically accessible open space. 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>(nb: approved scheme taken into consideration)</p> <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; soil quality as site unlikely to be contaminated; there is no surface water flood risk on site and groundwater levels are more than 5m below surface, and the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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:</p> <p>Heritage, due to heights of buildings and the impacts on heritage assets; 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; water quality as site within a GSPZ2; climate change mitigation as site not within a heat network opportunity area and proposed scheme does not include measures to further reduce carbon emissions; and climate change adaptation as development would result in urbanisation of parts of a site with natural form, although it is recognised that measures to reduce flood risk have been incorporated. The site also suffers from road noise which could impact upon occupier amenity. Public transport access is limited which could influence travel choice, although recognised that approved</p>

	<p>schemes includes measures to support sustainable travel.</p> <p>Potential positive effects:  Approved scheme found to be acceptable for biodiversity providing that avoidance/mitigation measures incorporated and will result in positive management of woodland and increase in calcareous grassland; approved scheme found to be acceptable in landscape terms, with the design benefiting from a landscape-led approach; approved scheme will result in an increase in various types of publically accessible open space; development of the site would have positive impacts for housing, particularly affordable housing as all housing would be delivered under the Joint Venture Scheme. Delivery of 242 in accordance with the planning consents would enable some 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: Site 21a, land to the north of Varley Halls, Coldean, Brighton**

<b>Site Description</b>	Site is designated as countryside. Site located within the area that lies between the A27 and Coldean Lane, adjacent to the Varley Halls student accommodation.
<b>Site Area</b>	0.94ha
<b>Current Use</b>	Undeveloped areas around halls of residence.
<b>Potential Use</b>	12 dwellings.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site within Land at Coldean Lane LWS. Ancient woodland is located to the south of site 21c. UFA 2015 found scattered found tall-ruderal habitats with scattered scrub on site, some of which support vegetation of a calcareous nature and potential for protected or notable species. UFFA 2015 found the need for habitat enhancement on the remainder of the site in order to reduce likelihood of significant impacts.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	The allocated area does 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	-	Site 21 is adjacent to the SDNP, however landscape qualities are compromised by urbanising influences, such as the A27 and presence of existing housing across Coldean Lane. Coldean Woods (within SDNP) lies in close proximity to the southern end of the site. Great Wood of Stanmer Park screens the sites from the SDNP.

access to it.		
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, therefore a significant negative effect is not attributed. 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 forms of transport and improve travel choice.	-	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 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 12 houses unlikely to have any impacts on air quality. Site suffers from road noise from the A27 of between 55-64 dcbL which could impact upon occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Site within GSPZ 1 and 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 below surface. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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, although undeveloped parts 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 13dph would be delivered on site 21a. Although the density on site 21a 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 12 dwellings would make a contribution to housing needs, and would require 30% affordable housing.
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 health.	+	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 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 deliver some 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:</p> <p>Development of the site is unlikely to raise any issues with the following objectives: open space as site as site is not designated open space; air quality 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; there is no surface water flood risk on site, groundwater levels are more than 5m below surface, and the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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:</p>

		<p>Development of the site could raise issues with biodiversity as the site is an LWS, although it is noted that the UFA2015 concluded that 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; 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 archaeological evaluation would be required to evaluate the potential and inform future decisions; water quality as site within a GSPZ1; 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 other areas of open space are not allocated for development.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing, including affordable housing. Delivery of 12 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>
--	--	--

#### 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 LWS.
<b>Site Area</b>	46.1ha (total site) of which 1.21ha proposed for allocation.
<b>Current Use</b>	Open space uses for various purposes, including recreation.
<b>Potential Use</b>	30 dwellings on 1.21ha of the site.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-	The site contains an LNR, designated for calcareous grassland habitats which support notable butterflies, and an LWS. 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. UFA15 indicated that impacts of development on the LNR would need to be mitigated through habitat enhancement and robust mitigation.
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. UFA2015 found that development that did not break the ridge line and avoided higher ground would avoid significant landscape effects.
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. Delivery of 30 dwellings on the site unlikely to result in a significant increase in daily vehicle movements/ air and noise 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. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature

and ability to adapt to climate change.		regulation) will be lost through development. However undeveloped parts of UF 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 predominantly open space with few existing buildings on site.
13. To make the best use of land available.	+	It is noted that the site capacity has reduced from 150 dwellings as proposed at draft stage, to 30 dwellings. It is understood that a larger scheme was found to be undeliverable due to access/technical/viability grounds. Delivery of 30 dwellings on this site would achieve a dwelling density of 25dph which is lower than that required by CPP1 CP14, however reflects the potential viability issues of the site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	It is noted that the site capacity has reduced from 150 dwellings at draft stage, to 30 dwellings. It is understood that a larger scheme was found to be undeliverable due to access/technical/viability grounds. Delivery of 30 dwellings would still make a welcome contribution to 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 (200m), 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 if delivered through the Joint Venture scheme. 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 flood risk on site, groundwater levels are more than 5m below surface, and

	<p>the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low. 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 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 mitigation as site not within a heat network opportunity area; 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 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. The site may also be suitable for family type housing (e.g. larger units). Development could provide employment/training for employment/skills deprived communities.</p>
--	---

**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 Bevendean Down Local Nature Reserve, LNR designated for its rich chalk grassland and Bevendean Horse Paddocks LWS, however these do not form part of the site allocation. 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. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low.
9. To reduce emissions of	-	Site not within a heat network opportunity area.

greenhouse gases that cause climate change		
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 could be lost through redevelopment.
<b>Overall Summary and Policy Considerations</b>	Mixed	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

	<p>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 site has no risk of surface water flooding, groundwater levels are more than 5m below surface, and the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low</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 and LWS, 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 benefits. Development could provide employment/training for adjacent employment/skills deprived communities.</p>
--	---

**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. Site contains Bevendean Horse Paddocks LWS and is adjacent to the Bevendean Down Local Nature Reserve which could be subject to increased recreational pressure.
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 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 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. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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	-	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

change.		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, and reduce crime and fear of crime.	++	Site within 50% most deprived SOA (crime domain).
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 could be lost through redevelopment.
<b>Overall Summary and Policy Considerations</b>	Mixed	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 site has no risk of surface water flooding, groundwater levels are more than 5m below surface, and the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; community safety as site not situated in an area that suffers from high levels of crime.

		<p>Potential adverse effects:  Development of the site could raise issues with biodiversity, as part of site within a LWS 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	0	The site does not include any designated open space.

space and green infrastructure and improve sustainable access to it.		
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)	++	Site not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Within flood zone 1. 1% of site at high risk; 5% at medium risk; 13% of low risk of surface water flooding. Groundwater levels more than 5m below surface. The SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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 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: 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</p>

	<p>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 and groundwater levels are more than 5m below surface, however the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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: 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>	Site has potential for 45 dwellings.

**Nb: planning consent taken into consideration with scoring, which may result in a mixed score.**

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	0/-	Majority of site contained newly designated Meadowvale LWS designated for calcareous grasslands and population of red-star thistle. 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	-	Within Flood zone 1. Some historic surface water flooding incidents adjacent to site. 2% at high risk; 5% at medium risk; 9% at low

development		risk of surface water flooding. Groundwater levels more than 5m below surface. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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 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.	+	Planning consent for 45 dwellings, will provide a density of 26dph. Development on part of site will allow ecosystem services to be retained on remainder of site.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Planning consent for 45 dwellings, of which 40% (18) will be affordable.
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 will 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 and would not result in 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: 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 is an LWS and 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 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 and groundwater levels are more than 5m below surface, however the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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:  The site has planning consent for 45 dwellings, 40% of which will be affordable and some of which will be suitable for family housing. Although there will be a net loss of total open space, the development will result in an increase in publically accessible open space.  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 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>	0.94ha
<b>Current Use</b>	Currently used for caravan storage
<b>Potential Use</b>	24 dwellings on 0.94ha 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 biological 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 LWS 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 designated 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, 2 and 3.
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 risk of surface water flooding including 23% having a high risk, 30% having a medium risk and 45% having a low risk. Groundwater levels more than 5m below surface. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be 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 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 24 dwellings on the entire site would achieve a site density of 25dph. 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 could provide 24 dwellings, of which 40% 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, 2 and 3; flood risk as parts of site have surface flood risk, however the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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>

**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.	+	<p>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 LWS. 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 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 LWS, 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.	++	<p>The site does not contain any designated open space. Outline planning permission includes provision of &gt;2,000m<sup>2</sup> of public open space and play area which would increase provision in this area.</p>
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 status)	-	All of site with GSPZ 3
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 (c.>10%). Medium to low risk on eastern edge of site. Groundwater levels more than 5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within a heat network opportunity area, however approved scheme incorporates solar PV.
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). Approved scheme for 60 units provides 40% affordable units and family housing.
15. To improve the range, quality and accessibility to services and	--	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

facilities.		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 will provide 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 growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site identified for housing only. Site no longer in active farming use. Recognised that development of site will result in losses in some employment opportunities/businesses, e.g. dog kennels and storage.
<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 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: 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; 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: Development of the site would have positive impacts for housing, including affordable housing. The approved scheme includes affordable and family housing. Development in accordance with the planning consent would</p>

		<p>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 approved scheme incorporates solar PV which supports 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. 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 LWS 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 area 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. Small part of northern extent of site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from development	-	In flood zone 1. Small part has risk of surface water flooding on site: 1% high risk, 2% medium risk; 2 low risk. Groundwater levels more than 5m below surface. SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low.
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; 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; small part of site has surface water flood risk and groundwater levels are more than 5m below surface, however the SFRA did not consider the site to require consideration by the sequential/exceptions tests and found the overall flood risk for the site to be low; 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:</p> <p>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.</p> <p>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>
--	--

## Appendix F3 SA Site Assessments - H3 Allocated Sites

### 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, above the existing bus 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 impact upon air quality in this location. Site subject to road noise levels exceeding 55dcbLs. 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.

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. 32% of site has high risk of surface water flooding; 43% has medium risk and 50% has low risk. Groundwater levels between 0.5-5m below surface. SFRA did not consider this site to require testing through the sequential/exceptions test.
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, 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 housing for particular community (students). 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	0	Site identified for PBSA and redevelopment would not result in any losses of employment land.

<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>Mixed</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, 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. Part of the site has a high-low risk of surface water flooding and groundwater levels are between 0.5-5m below the surface although it is noted that SFRA did not consider this site to require testing through the sequential/exceptions test. 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 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.</p>

**SA site assessment:** 118-132 London Road, Brighton, BN1 4JH

<b>Site Description</b>	The site currently comprises 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>	Approved application (BH2018/02699) to demolish existing buildings and provide for 232 student bedspaces, community hub and A1 floorspace at ground floor level.

**Nb: approved application considered in 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 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. Sustainability Checklist submitted with planning application indicates that no features to enhance the biodiversity value of the scheme will be added.
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. In proximity to various other heritage assets. However heritage comments confirmed that current building is of no historic interest and currently makes a minor adverse contribution to the setting of the Conservation Area. Comments did not consider the development to adversely effect St Bartholomew's Church not on the setting of other nearby listed buildings, but would impact on views across the Valley Gardens Conservation Area, but would be modest in nature and not harmful due to the mixed urban context, and overall preserve 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.	++	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.
6. To reduce air and noise pollution.	--	Site within AQMA. Site also suffers from high levels of road noise. Approved scheme does not include any parking spacing therefore air quality unlikely to be effected by the proposal.
7. To improve water quality	++	Site not within 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 is PDL. Entire site has a low risk of surface water flooding and small parts have high and medium risk of flooding also. Site is adjacent to an area with a high risk of flooding. Site has no risk of groundwater flooding. SFRA recommended that the site should be considered through the sequential/exceptions test due to the proportion of the site being in the surface water accumulation zone.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site within a Development Area and also within a heat network cluster area. Development will make use of air-source heat pumps, which is a low carbon technology and will also include a solar array. Conditions could be used to secure space for connection to a future district 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. No green infrastructure incorporated which would have improved adaptation to climate change.
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	--	Approved scheme will result in demolition of existing buildings therefore no opportunity to re-use existing resources.
13. To make the best use of land available.	++	Although redevelopment will not facilitate adaptive re-use of existing buildings, a PBSA over some retail units would help to make better use of existing land resources as would not involve any new land-take. Density of 336dph.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Approved scheme will provide 232 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 inclusion	++	Site has potential to deliver housing for particular community (students). Site situated within 20% most 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	0	Site identified for PBSA and redevelopment would not result in any losses of employment land nor employment generating uses.

opportunities and meet local employment needs.		
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>(nb: approved scheme considered in scoring)</p> <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; heritage as approved scheme was found to preserve the settings of heritage assets; 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:</p> <p>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 entire site has a risk of surface water flooding, and SFRA recommended that the site should be considered through the sequential/exceptions test. 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:</p> <p>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 with retail units below 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. The approved scheme incorporates low/zero carbon technologies and supports climate change mitigation.</p>

**SA site assessment: 45 and 47 Hollingdean Road, Brighton**

<b>Site Description</b>	The site incorporates a vacant building fronting Hollingdean Road and the rear of the site which includes a separate building currently used as vehicle repairs and an area of hard-standing.
<b>Site Area</b>	0.09ha
<b>Current Use</b>	Vacant A1 unit; vehicle repair workshop and storage yard (sui generis)
<b>Potential Use</b>	Purpose Built Student Accommodation – 40 bedspaces.

<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. Nearest designated site (LWS) c.150m (across Lewes Road) and unlikely to be effected by development. 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 any designated heritage assets. Site has no potential for archaeology. Round Hill Conservation Area is c.70m from the south of the site, however is beyond the existing Sainsbury's access ramp. The ground level of the site is lower than the heritage assets and therefore development in this location is unlikely to be visible and effect the setting, unless a significantly tall building is proposed. A development providing a 40 bed-spaces is unlikely to be significantly tall.
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 within less than 100m and health facilities less than 400m and considered to be 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 impact upon air quality in this location. Road noise levels less than 55dcblls therefore no impact. 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.
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. Parts of site have a risk of surface water flooding, including 7% at high risk, 52% at medium risk and 70% of low risk. GW levels between 0.5 to 5m below surface. Although the site does have flood risks, the SFRA did not consider the site to require further consideration by the sequential/exception tests due to a locally set threshold of the area at risk being less than 1,000m2.
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, or further increase urbanisation of the city.
11. To improve soil quality	+	Geo-environment report undertaken for recent planning application indicates site has potential for contamination based on current use. This therefore provides an opportunity for remediation.
12. To minimise and sustainably manage waste	--	Unlikely 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, redevelopment would make good use of the site, some of which is currently vacant.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could provide 40 student bedspaces and would contribute towards meeting the need for purpose built student accommodation. Could also help to free up family-sized housing.
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.350m) and open space (c190m). 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.350m) and open space (c190m). 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 which would need careful design.
17. To improve community safety, and reduce crime and fear of crime.	-	Site can be safely and easily accessed. Site located within 20% most deprived SOA (crime domain). Opportunities to design out crime would need to be incorporated on site.
18. To increase equality and social inclusion	++	Site has potential to deliver housing for particular community (students). Site situated within 10% most deprived SOA education domain and 10% most deprived employment domain, and could therefore offer opportunities to provide training-based skills.

<p>19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.</p>	<p>0</p>	<p>Site identified for PBSA. Redevelopment would result in loss of land currently in sui generis uses.</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 does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; road noise, as not subject to high road noise; SDNP due to situation within existing urban context; heritage as the site does not contain and is unlikely to impact on proximate 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; 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 within a GSPZ1 and construction could pose a risk to water quality. Parts of the site has varying levels of surface water flood risk, and groundwater levels are between 0.5-5m below surface, however the SFRA did not require consideration by sequential/exception test. In addition, development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Site is within an area of high crime deprivation and should incorporate opportunities to design out crime.</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 would have positive impacts for making the best use of land, particular as some buildings on site are currently vacant. Development of the site may provide opportunities for nature conservation enhancement. Although not within a Heat Network Cluster Area, PBSA provides the opportunity to use energy more efficiently e.g. through communal heating schemes, supporting climate change mitigation. Redevelopment of the site should result in remediation of contaminated land. Development could provide training/employment opportunities for communities suffering from high levels of education/employment deprivation.</p>

## Appendix F4 SA Site Assessments - Strategic Site Allocations

### SA site assessment: SSA1 Brighton General Hospital, Elm 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>	4.97ha
<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, new health care facility and community facilities.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
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 known to be a site for swift nesting, which is a local BAP species.
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 its setting, and improve sustainable access to it.	0	Site is within urban area and is screened from the SDNP by existing buildings.
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 ((1% site 1 in 100 risk; 3% of site 1 in 1000 risk). Groundwater levels more than 5m below surface. Noted that the SFRA found the risk of flooding to be low, but the level 2 SFRA noted flood risk of surrounding properties which may be affected by development due topography and suggested surface SUDS such as swales as well as other GI such as green roofs and permeable paving. SFRA Level 2 undertaken as site is strategic site.
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. If development results in 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 200 dwellings delivered this would provide a site density of 50dph, 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 200 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 desirable 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 health services on site. Primary school within desirable 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 80 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	<p>No issues: Development of the site is unlikely to raise issues with the following objectives: 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 result in loss of employment land and should enable health jobs to be relocated.</p> <p>Potential adverse effects: Site known as a nesting site for swifts which are a Local BAP species; development of the site could result in loss of amenity greenspace situated on site. The site contains designated 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 small areas at low to medium risk of surface water flooding; groundwater levels more than 5m below surface and overall SFRA considered site to be at low risk of flooding. Level 2 SFRA undertaken noted the flood risk of surrounding properties would need to be a consideration. Any loss of open space and an increased urbanisation of the site could increase flood risk, impacting on climate change adaptation.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 200 dwellings are provided this should include 80 affordable units making a significant contribution to housing need. Although this would only equate to a site density of 40dph, this may reflect the need to sensitively consider the on-site heritage assets as well as providing other uses. Development of the site would also increase access to health provision, positively impacting upon access to health provision. Redevelopment of the site may provide the opportunity of adaptive</p>

		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 additional 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.
--	--	---

#### 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>	1.19
<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 1,000sqm employment floorspace.

SA Objective	Score	Commentary
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. Not known to 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	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 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	++?	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.

travel choice.		
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. No surface water flood risk on site allocated. Groundwater levels located more than 5m below surface. SFRA considered this site to be of low flood risk, however level 2 SFRA undertaken for this site as a strategic site.
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 80dph. 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 and the site has poor air and noise quality which could impact upon occupier amenity.
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 and increase provision of B1 floorspace in particular.
<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 known 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; flood risk as site has no surface water flood risk and groundwater levels more than 5m below surface; 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 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:</p> <p>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. 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. 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 80dph, 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</p>

		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.
--	--	---

#### SA site assessment: 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. 3.3ha
<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 retention/replacement of 5,700sqm employment floorspace.

SA Objective	Score	Commentary
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. Not known to 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.
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 sources of flooding to and from development	-	Site is PDL. Within Flood zone 1. Parts of site have risk of surface water flooding including 1% of land at high risk (1:30yr event), 2% of land at medium risk (1:100yr event) and 14% in low risk (1:100yr event). Groundwater levels vary from 0.5-5m and >5m below surface. SFRA considered this site to be of low flood risk, however level 2 SFRA undertaken for this site as a strategic site. Level 2 suggested surface SUDS such as swales and other green infrastructure such as green roofs would support drainage control.
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	++	Good access to most services. Health (200m), shops (100m), open spaces (200m), primary (400m) and secondary schools (1,200m) all within desirable walking distance.

health.		Proposals may also result in expanded D1 health facilities.
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.
<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; 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:</p> <p>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 levels vary from between 0.5m-5m to &gt;5m below surface, however overall the SFRA considered the flood risk of the site to be low. 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:</p> <p>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 90dph, 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</p>

		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.
--	--	--

### SA site assessment: 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>	3.61ha
<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 500 dwellings, 60000sqm 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 3.
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 (5%) has low risk of surface water flooding (1 in 1000yr event). Groundwater levels between 0.5-5m below surface. SFRA considered this site to be of low flood risk, however level 2 SFRA undertaken for this site as a strategic site. SFRA Level 2 suggested surface SUDS such as swales and other green infrastructure such as green roofs would be support drainage control but that infiltration would not be suitable due to the GSPZ.
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 500 dwellings are provided this would deliver a site density of 138dph which exceeds CPP1 density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	SHLAA analysis suggests 500 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	++	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

health.		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 inclusion	++	Site could deliver a high amount of affordable housing. Site itself has relatively low levels of employment and 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 surface water flooding and groundwater levels are between 0.5-5m below surface. SFRA Level 2 suggested surface SUDS such as swales and other green infrastructure such as green roofs would be support drainage control but that infiltration would not be suitable due to the GSPZ. The site is within a GSPZ 1,2 and 3, and construction/leaching of contaminants 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 500 dwellings are provided this should include 200 affordable units making a significant contribution to housing need. This would equate to a site</p>

		<p>density of 138dph, 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. 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</p>
--	--	---

#### SA site assessment: 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>	6.4ha
<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, 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 Madeira Drive Green Wall LWS, Volk's Railway LWS and adjoins the Black Rock LWS.
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	--	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.

archaeological sites.		
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 across the length of the terrace. Access to existing 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 55-69dcbLs.
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 parts of the site have a low, medium and high risk of surface water flooding. Groundwater levels between 0.5m and 5m below surface.
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 the Terraces 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; 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 on site Madeira Green Wall LWs and proximity to Volk's Railway and Black Rock LWS 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 has varying degrees of surface water flood risk, and groundwater levels are between 0.5-5m below the surface, although the SFRA considered the site to have a low flood risk overall. 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: 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>	0.02ha
<b>Current Use</b>	Vacant area of hard-standing
<b>Potential Use</b>	Site has potential for leisure uses and ancillary supporting retail 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 LWS 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 sources of flooding to and from development	-	Site situated within flood zone 1 despite its coastal location. No risk of surface water flooding. Groundwater levels between 0.5-5m below surface.
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	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; surface water or tidal flood risk; 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>Potential adverse effects: Development of the site could raise issues with biodiversity due to proximity to Volk's Railway LWS and heritage assets as site within a Conservation Area and in close proximity to a listed structure. Groundwater levels between -0.5-5m below surface. 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>
--	---

#### 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>	0.7ha
<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
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	-	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.

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.	-	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 dcbels 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. 35% of site at risk of surface water flooding (low risk 1:1000yr event). Entire site has a high risk of groundwater flooding, with 41% of site with water levels between 0.025m and 0.5m below surface (highest risk categories). However, the SFRA found the overall risk to be low and did not require further consideration by the sequential/exceptions tests.
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 change.	-	Site is a vegetated landscape bund, which consists of grassed area. Development of the site would result in loss of this green infrastructure provision.
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	<p>No issues:</p> <p>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> <p>Potential adverse effects:</p> <p>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. Part of the site has a low risk of surface water flooding, and part of the site has a high risk of groundwater flooding due to groundwater levels, however the SFRA considered the overall risk to be low and did not require consideration by sequential/exception test. 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:</p>

	<p>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>
--	---

## Appendix F5 SA Site Assessments - E1 Allocated Site

### SA site assessment: E1 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.	-	Small part of site comprises Benfield Valley LWS and is adjacent to a further LWS. 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 dcbls 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. Site is flood zone 1. None of site has any risk of surface water flooding. Site could have risk of groundwater emergence but is not within two highest risk categories of the SFRA, and the SFRA found the overall risk of flooding to be low. It is noted that there are no vulnerable uses proposed for the site.
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 no 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 inclusion	++	Site is within 30% most deprived SOA (employment domain) and 20% most deprived SOA (education domain). Therefore delivery of employment uses in this area could provide employment/training opportunities that could increase local skills/employment.

<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>Site could provide new land for employment uses. Site has excellent access to SRN which may support business in this location.</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: 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. Site has no risk of surface water flooding.</p> <p>Potential adverse effects:  Development of the site could raise issues with biodiversity (due to greenfield nature of site) and due to part of site comprising a LWS, 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 emergence although is not within the two highest risk categories and the SFRA considered the overall flood risk to be low. 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>

## Appendix F6 SA Site Assessments of rejected sites / sites no longer being allocated

Site	Stage Rejected	Reason
Kings School Site, High Street, Portslade	At draft stage	Uncertainty over deliverability within plan period
Land to the rear of 62-68 Beaconsfield Road and Springfield Road, Brighton	At draft stage	Undeliverable within plan period
Land West of Homeleigh, Patcham	At draft stage	Not available in plan period due to existing use
Urban Fringe Site 31, Land east of Whitehawk Road	At draft stage	Not available in plan period due to existing use
Urban Fringe Site 37 Roedean Miniature Golf Course	At draft stage	Not available in plan period due to existing use
H1 46-54 Old London Road, Patcham	Between draft and Proposed Submission stage	Not available in plan period due to existing use
H1 Baptist Tabernacle, Montpelier Place,	Between draft and Proposed Submission stage	Commenced
H1 Selsfield Drive Housing Office	Between draft and Proposed Submission stage	Commenced
H1 The Astoria	Between draft and Proposed Submission stage	Commenced
H1 270 Old Shoreham Road, Hove	Between draft and Proposed Submission stage	Not available due to proposed employment uses
H1 Downsman Pub, Hangleton	Between draft and Proposed Submission stage	Development commenced
H1 251-253 Preston Road, Brighton	Between draft and Proposed Submission stage	Development commenced
H1 Former Brewery site, South Street, Portslade	Between draft and Proposed Submission stage	Development commenced
27-31 Church Street, Brighton, for PBSA	Omission site put forward during draft consultation	Already allocated as a proposed residential-led mixed-use allocation
Dolphin House, Manchester Street for C3 led/B1	Omission site put forward during draft consultation	Not suitable for allocation due to existing uses

Brighton Racecourse as a Strategic Allocation	Omission site put forward during draft consultation	Not suitable due to site constraints and uncertainties
---	---	--

## Sites rejected prior to draft stage

### SA site assessment: Kings School site, High Street, Portslade, BN41 2LG

<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; however considered unlikely that this will come forward in the plan period due to uncertainties over availability within the plan period.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
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 (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all	-	Site contains a mixture of land of an urbanised form and some green open space. Unknown whether any of the

sources of flooding to and from development		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 for 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 growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site has potential for housing only and will not result in loss of land in employment uses. Site in education uses, however school will be re-provided on a new site which is currently under construction.

<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**

<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). However considered unlikely to be deliverable within the plan period.

<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 status)	-	Part of site within GSPZ 2.
8. To reduce the risk from all sources of flooding to and from	-	Site comprises open space in a natural form. Small parts of site have low to medium risk of surface water flooding.

development		
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 employment needs.	0	Site identified for housing only. Site not in former employment uses.

<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

<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; however considered unlikely that this will come forward in the plan period due to existing use and therefore availability within the plan period.

<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 50dcbIs.
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	++	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 growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for housing only. Site not in former employment uses.
<b>Overall Summary and Policy Considerations</b>		<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; 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:</p> <p>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</p>

	<p>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. Considered unlikely that this will come forward in the plan period due to availability within the plan period and existing uses.

SA Objective	Score	Commentary
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,	-	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.

townscapes, buildings and archaeological sites.		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	++	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, and reduce crime and fear of crime.	-	Site is within 20% most deprived SOA (crime deprivation). Any development would need to incorporate 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	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, particularly allotments could impact upon physical and mental health and may particularly impact upon</p>

		<p>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>
--	--	---

#### 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. Considered unlikely that this will come forward in the plan period due to availability within the plan period and existing uses.

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 its setting, and improve sustainable access to it.	-	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 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 available.	+	A housing density of 25dph would be delivered in 25 dwellings are delivered, which is lower than CP14 targets. 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 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</p>

		<p>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>
--	--	--

## Sites rejected or not allocating at Proposed Submission Stage

### 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>	Although the site was previously found to have potential for 30 dwellings, it is considered unlikely that this will come forward in the plan period due to the site not being available due to existing uses.

<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 and is within 500m of an LNR which may be sensitive to any increased recreational pressure.
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 dcbels which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity)	--	Site located within GSPZ 1, 2 and 3.

status)		
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 at risk of groundwater flooding as GW levels between 0.025m and 0.5m below ground surface. SFRA indicates site at higher risk of flooding based on groundwater flood-risk and that sequential and exception test should be undertaken in order to allocate this 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.	-	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 2018 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>	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 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 and is within 500m of a LNR which may be sensitive to any increased recreational pressure; water pollution as is within GSPZ1, 2 and 3; flood risk as risk of groundwater and surface water flooding, with previous flooding incidents on site and SFRA indicating that sequential and exception test would need to be undertaken for this site due to the higher risk of flooding; 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 were 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: 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: Development 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.	++	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 historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	++	Within Montpelier & Clifton Hill Conservation Area. Opposite Brunswick Town Conservation Area. 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. SFRA considered site to be at low risk overall.
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	<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 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 and groundwater levels more than 5m below surface; 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</p>

		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.
--	--	---

#### 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>	Cleared site. Former storage buildings and garages demolished.
<b>Potential Use</b>	Site has extant planning consent for 30 dwellings.

#### Approved scheme considered in appraisal where relevant.

SA Objective	Score	Commentary
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. Approved planning consent incorporates measures that will improve biodiversity.
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 due to size of site. Noted that the approved planning consent includes S106 contributions to improve proximate areas 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.	-	Site has contains no designated heritage assets, however is within an ANA. Planning consent requires archaeological investigation works, required by condition.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve	++	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.

travel choice.		
6. To reduce air and noise pollution.	++/-	Site not within AQMA. Site subject to road noise. Planning consent includes conditions to ensure adequate sound-proofing.
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. SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests.
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. Approved scheme includes solar PV.
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. Approved scheme incorporates some tree planting.
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.	++	Approved scheme will 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 health.	+	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. 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 will deliver 30 dwellings, all of which will be affordable rented, and could therefore support people on lower incomes. Wheelchair accessible units will also be provided. 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. S106 includes contribution to local enterprise schemes and commits the developer to using 20% local labour during construction phase.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	-	Site was previously used for temporary storage and prior to that was previously in B1 office uses. 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 an ANA and could have impacts on archaeology and approved scheme requires site investigation to be carried out. The site is subject to high levels of road noise, which could impact upon the amenity of future residents, and soundproofing secured by condition. 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 development could impact upon water quality. Site may have risk of groundwater flooding as levels between 0.5 and 5m below surface however SFRA considered site to be at low risk overall and did not recommend consideration by sequential/exception tests. Redevelopment of the site for housing would result in loss site formerly used as 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>Re-development of the site in accordance with its planning consent will have positive impacts for housing and will provide 30 units all of which would be affordable rented. Delivery of 30 dwellings would provide a site</p>

		density of 600dph which exceeds minimum requirements and would redevelop an underused site, helping to make good use of sites in the city. Development will incorporate opportunities for nature conservation enhancement. Development will contribute towards improving open space. The approved scheme incorporates solar PV. Approved scheme incorporates tree planning therefore supporting climate change adaptation. Development of the site may also provide employment/training opportunities for adjacent deprived communities.
--	--	--

#### 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.

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. 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 the 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 small area at low risk of surface water flooding risk and groundwater levels between 0.5 and 5m below surface which could increase risk of groundwater emergence. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.
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; 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. Site could be at risk of groundwater emergence and has small area at low risk of surface water flooding, although SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. 70 dwellings are to be provided, including 4</p>

		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 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
--	--	---

#### 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 only considered to have potential for B uses, following representation from landowner, therefore no longer considered suitable for a C3 allocation.

<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.	-	There are no designated heritage assets on or adjacent to the site. The site is within the Goldstone 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. 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.	+	Unlikely to deliver any dwellings, however recent application under consideration, which if found acceptable, would result in an increase in B floorspace on the site and would increase land use efficiency.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	0	Site no longer considered suitable for housing based on representation received at draft CPP2 stage, and also current planning application under consideration.
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,	++	Site situated within 50% most deprived SOA (crime domain). A mix of uses on site could provide passive

and reduce crime and fear of crime.		surveillance and support community safety.
18. To increase equality and social inclusion	+	. 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 would increase B floorspace and would provide new employment floorspace in the city.
<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 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 no risk of surface water flooding on site and groundwater levels are more than 5m below surface; 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 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: Redevelopment to provide B uses would result in delivery of new B employment floorspace. Redevelopment would increase land use efficiency and make better use of land available. Site may have potential for contamination which would provide the opportunity for remediation. 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.</p>

**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.	-/+	Adjacent to LWS. 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). Planning consent includes a contribution towards recreation.
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 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 (car ownership higher than Brighton average). Planning consent includes provision of parking spaces at a lower rate 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 55dcbLs. 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 10% at low risk of surface water flooding. Groundwater levels between 0.5 and 5m below surface. 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. SFRA considered site to be at low risk overall and did not require further consideration by the sequential/exceptions test. 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 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 (public house) although it is acknowledged this had been 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	+	Approved scheme includes 40% affordable dwellings (13 units). 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:</p> <p>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 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 (noted that the SFRA considered the site to be at</p>

	<p>overall low risk and did not require further consideration by sequential/exception tests). 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. 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>
--	--

**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.**

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
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	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.	++	<p>Site is within a Conservation Area however is not featured as a notable building within the CA Character Statement.</p> <p>Heritage comments concluded that the terraced housing is situated so that the historic setting of the villas is retained.</p> <p>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.</p>
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	<p>Very good access to regular bus services and train station. Shops and some other facilities within 470m of site and within walking distance.</p> <p>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.</p>
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	-	<p>PDL site, 11% of site has risk of surface water flooding, of which 2% at high risk (1:30yr event). Groundwater levels also between 0.5m and 5m below ground surface therefore there could be a risk of GW emergence. SFRA considered site to be at overall low risk and did not require further consideration by the sequential/exceptions test.</p> <p>Approved scheme includes infiltration SUDS to manage surface water runoff and ensuring that a fall away from the buildings to the highways is maintained.</p>
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	++	Redevelopment of vacant/derelict site on PDL helps to make best use of land available. Redevelopment in

available.		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 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 use provided jobs, however presumed that these will be provided elsewhere in the city.
<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</p>

	<p>has some risk of surface water flooding and could be at risk of groundwater emergence, however SFRA did not require further consideration under the sequential/exceptions tests.</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: 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	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.

improve sustainable access to it.		
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 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. 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 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	-	Small parts of the site have a 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. Groundwater levels between 0.5m and 5m which present risk of GW flooding although not in the highest risk categories. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests. 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 facilities.	++	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.
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, however this is not considered to be significant recognising that the site is currently vacant.
<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:</p>

	<p>Conversion and redevelopment will result in loss of land in employment uses, although recognised that the site is vacant. Site could have risk of surface water and groundwater flooding. SFRA considered site to be at low risk overall and did not recommend further consideration through the sequential and exception tests.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. 48 dwellings are to be provided. Although 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>
--	--

**Omission Sites – not allocating  
Strategic Site – Brighton Racecourse**

<b>Site Description</b>	A PDL site within the urban fringe comprising Brighton Race-Course grandstand, with several areas of open space including amenity green-space and parking.
<b>Site Area</b>	6.58ha
<b>Current Use</b>	In use as Brighton Race-course, events venue, horse-race-track, paddocks, parking and amenity green-space.
<b>Potential Use</b>	Site put forward as a strategic site allocation for a mixed use development including hotel, commercial, housing and parking with retained racecourse.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site comprising areas of open space. Site put forward for allocation does not contain any nature conservation designations, however is in close proximity to Whitehawk Hill LNR.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	The site includes some areas of publically accessible amenity greenspace which may be lost through redevelopment. The site meets accessibility standards for at least 1 type of open space due to presence of amenity greenspace. 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 its setting, and improve sustainable access to it.	--	Site is in a visible and prominent ridgetop location visible from various points within the SDNP. It forms part of the horse-shoe ridge linking Race Hill, Red Hill and Whitehawk Hill, which is undeveloped other than the racecourse buildings. 2014 UFA stated that the distinctive form of the racecourse adds to the character of the landscape and found the urban fringe site to be sensitive in terms of landscape and did not find the area proposed as a strategic site allocation suitable for development.
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 located on southern part of site, immediately adjacent to the southern part of the grandstand and currently used as paddocks, with some low-rise stables on site. Development, particularly on the southern part of the racecourse site, would be on, or within the immediate setting of, the SM. UFA 2014 discounted the area of the SM and its immediate setting from any assessment, as considered this to be an absolute constraint. UFFA 2015 (Archaeology) stated that the racecourse itself is an asset to heritage, established in the 18 <sup>th</sup> century, with the character of a downland racecourse, and that development too close to the racecourse would impact on its character and setting. Entire site 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. Local shops located within walking distance. Reasonable access to other facilities. 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 potential use of site may generate significant amounts of traffic at different times of the day.
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 however contains extensive areas of open space. Situated within Flood Zone 1. No risk of surface water flooding on site. Groundwater levels more than 5m below surface.
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). If development results in loss of green spaces/green infrastructure, this may increase site vulnerability to the impacts of climate change.
11. To improve soil quality	0	Site unlikely to be contaminated based on current/former uses, however this would need investigation/clarification.
12. To minimise and sustainably manage waste	--	Some existing buildings would require demolition to enable development to take place and would not allow for adaptive re-use.
13. To make the best use of land available.	-	Unlikely that minimum density targets could be achieved without having adverse impacts due to its sensitive and prominent ridgetop location and heritage considerations. Greenfield functions likely to be lost through development.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+?	Site capacity unknown, however promoter putting site forward for residential would result in positive impacts for this objective.
15. To improve the range, quality and accessibility to services and facilities.	+	Primary school within desirable walking distance (710m). Some services within acceptable walking distance including shop (500m) and GP (800m). 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.	+	Primary school within acceptable walking distance (710m). Some services within acceptable walking distance including shop (500m) and GP (800m). Open spaces (except amenity greenspace) and secondary schools over preferred maximum walking distance.
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 10% most deprived SOA (crime domain) and would need to incorporate features to design out crime.
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.

<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>Redevelopment of the site to provide commercial and hotel uses could provide new jobs and economic opportunities.</p>
<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed with some potential for significant adverse effects, particularly landscape and heritage.</p>	<p>No issues: Development of the site is unlikely to raise issues with the following objectives: biodiversity as site does not contain any biodiversity designations, although recognised is in fairly close proximity to an LNR; flood risk as no risk of flooding on site and groundwater more than 5m below surface; 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. Site considered unlikely to suffer from contamination due to current uses. although would require investigation.</p> <p>Potential adverse effects: The site is in a prominent and visible ridgetop location and could have significant visual and landscape impacts. The site contains designated heritage assets including a Scheduled Monument, the setting of which could be adversely affected by redevelopment. In addition, the downland racetrack is also of heritage significance. Development of the site likely to result in loss of amenity greenspace situated on site. Although not within an AQMA or area that suffers from high levels of road noise, development as a strategic site could result in an increase in vehicle movements around the site, which could have air and noise quality impacts. Any loss of open space and an increased urbanisation of the site could increase flood risk and temperature regulation, impacting on climate change adaptation. Development of parts of site would result in demolition and production of waste, and would not allow for adaptive reuse.</p> <p>Potential positive effects: Although no information on the amount of residential development proposed has been put forward, any residential development would have positive impacts for the housing objective, although local constraints are likely to impact upon the densities achieved. The site would have positive impacts for employment, as development of site for proposed commercial and hotel uses would result in opportunities for employment, and contribute to employment land supply. 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, supporting community safety in an area of high crime deprivation. The site may be able to provide employment/training opportunities for locally deprived communities.</p>

## SA Assessment -Omission Site

### Purpose Built Student Accommodation- 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>	Proposed for PBSA to provide 70 bedspaces.

<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 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.	--/++?	Site within the North Laine Conservation Area. Site within Brighton historic core ANA. Site in close proximity to listed buildings. Good design could have potential to enhance Conservation Area, particularly considering the existing site appearance and the impact of a vacant site on heritage assets.
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. Site does not suffer from high levels of road noise. PBSA unlikely to result in any increase in daily light vehicle amounts.
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. PBSA could benefit from communal heating that can help reduce carbon emissions.

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 and could provide opportunities to incorporate green infrastructure.
11. To improve soil quality	+	Site has potential for contamination based on former industrial uses which will require remediation.
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 70 student bedspaces would equate to a density of 583 bedspaces per hectare.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	-	Proposer suggests site could accommodate 70 bedspace PBSA which would make a significant contribution to student accommodation and could potentially free up family-sized housing occupied by students. However PBSA does not count towards C3 housing provision for which there is a great need locally due to lack of 5-year housing supply. In addition, site has an extant planning consent for 9 dwellings and therefore PBSA on the site instead of the housing permitted would have an adverse impact on C3 housing supply, albeit minor in nature.
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. Access to some services would not be a consideration for PBSA.
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. 70 bedspace PBSA would help to increase footfall in the area and can help to reduce the fear of crime through activity and passive surveillance.
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.	-	Site for PBSA only; no employment floorspace proposed. Site has an extant planning consent which includes 630sqm of B1 floorspace as well as other uses that would provide employment. PBSA instead of the permitted schemes would therefore have an adverse impact on this employment land supply.
<b>Overall Summary and Policy Considerations</b>		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; flood risk as site not at risk of tidal or surface water flooding and groundwater levels

	<p>more than 5m below surface; 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: Development of the site for PBSA instead of the extant planning consent for a mixed use scheme would result in small loss of anticipated housing and employment land. Site is within the AQMA and any traffic to and from the site for any purpose would need to travel through the AQMA although it is considered unlikely that PBSA would result in an increase in vehicle movements. Site has heritage constraints.</p> <p>Potential positive effects: Delivery of 70 bedspaces would equate to a density of 583 bedspaces per hectare and make good use of a derelict site. Although situated within a conservation area and adjacent to listed buildings and an ANA, bringing a site back into use could contribute positively towards improving the street scene and therefore heritage assets, subject to design of the scheme. The site has potential for contamination based on former uses, which would provide the opportunity for remediation. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime, although development of a vacant site could help reduce fear of crime as well as increase footfall and activity in the area and support community safety. A PBSA scheme could support climate change mitigation, for example through low-carbon opportunities such as communal heating. The development could also include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement.</p>
--	---

### SA Assessment -Omission Site - Residential: Dolphin House, Manchester Street, Brighton

<b>Site Description</b>	5 storey 1980s building, currently in mixed D1 and B1 uses, in close proximity to the seafront and St James' Street District Centre.
<b>Site Area</b>	0.05ha
<b>Current Use</b>	In use as language school (D1) and office (B1).
<b>Potential Use</b>	Put forward for c.20 C3 dwellings as a conversion of the existing building.

<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. Conversion of existing building may not provide opportunities for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Conversion 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 within East Cliff Conservation Area. Some listed buildings in close proximity to site including some Grade II listed buildings on Manchester Street. Site also within Little Laine ANA. However, re-development of site as a conversion unlikely to have any impact upon surrounding heritage assets. Noted that the building appears maintained and in good condition.
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 has potential for low-car/car-free housing due to its central location.
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. Conversion of the site into C3 uses unlikely to generate change in average vehicle flow from the existing position which would significantly impact upon air quality in this location (e.g >100 annual average daily total light vehicle movements). Part of site subject to road noise levels exceeding 55dcbls.

		The site has been put forward for residential uses. Although this proposed use is unlikely to generate significant noise, it is noted that the site is in close proximity to a night-club and 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 exiting 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. No risk of groundwater emergence.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within or proximity to a potential heat network cluster. Conversion of existing building may limit opportunities to increase efficiency/reduce carbon emissions.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Conversion of the site will not result in loss of green infrastructure, or further increase urbanised area of the city. Conversion may not allow for opportunities to incorporate measures to allow adaptation to climate change.
11. To improve soil quality	?	Unknown whether site has any potential for contamination and whether a conversion would result in opportunities for remediation.
12. To minimise and sustainably manage waste	+	Conversion of existing building which is currently in use, would make use of existing resources and materials and facilitate adaptive reuse.
13. To make the best use of land available.	+	Site currently in active use. Conversion would enable adaptive reuse of an existing building. Conversion of the site to provide c.20 dwellings would equate to a site density of 400dph which would exceed CPP1 density targets, although loss of existing B1 office accommodation would be against the recommendations of the Housing and Employment Land Study.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Proposer suggests c.20 dwellings could be provided. This should include 40% affordable in accordance with CPP1.
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 (220m); 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,	-	Site can be safely and easily accessed. Site located within 10% most deprived SOA crime domain. Opportunities

and reduce crime and fear of crime.		to design out crime should be maximised. Residential uses may help to increase passive surveillance at different times of the day, compared with existing uses.
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable dwellings if c.20 dwellings provided. 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 active B1 and D1 uses. Conversion to residential uses would result in loss of land in active employment uses and would be against recommendations of the Housing and Employment Land Study. Loss of language school would result in job losses on site.
<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; 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 or groundwater flooding; climate change adaptation as site entirely PDL; access and health due to proximity to services. Although the site has heritage constraints, conversion of the existing building is unlikely to impact upon adjacent heritage assets. It is unknown whether the site has any potential for contamination and whether conversion would provide an opportunity for remediation.</p> <p>Potential adverse effects:</p> <p>Conversion to residential uses would result in loss of employment land, as well as potential loss of jobs provided by the language school. Site is within the AQMA, which could impact upon health. Traffic to and from the site would need to travel through the AQMA, although acknowledged that the change of use may not result in any significant change to daily light vehicle flow when compared to its existing use. 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 and may impact upon amenity. Site is not located within a heat network cluster area and conversions may not present opportunities to increase energy efficiency. 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 c.20 dwellings are provided this should include some affordable units and would equate to a site density of 400dph, making good use of land resources, although resulting in a loss of land in other uses. Conversion of existing building which is currently in use, would make use of existing resources and materials and facilitate adaptive reuse. A scheme in this location has potential to be car-free.</p>

## **Appendix G CPP2 Policy Appraisals**

This Appendix includes the policy appraisals taken place between draft and Proposed Submissions stages. The policy has been re-assessed as a whole, but particular attention has been paid towards any changes to policy, including any amendments agreed at Full Council, 23.04.20. The key changes to policy have been set out in brief. This Appendix also sets out the options considered at earlier stages.

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.

### **Assumptions for all assessments:**

- SA assessment only assesses the direct contents of this policy.
- Assume that any generic potential impacts of any types of development, e.g. potential impacts on biodiversity etc, will be addressed through implementation of policy, and all other requirements, e.g. sustainability standards, will be achieved, resulting in no impacts on those relative objectives.

### **Housing, Accommodation and Community Policies**

#### **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.

##### **Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Table 2 in Policy replaced with government's updated published version of space standards, however space requirements remain largely the same.
- Clarification to supporting text – custom build/ self-build and reference to ecological and green infrastructure networks

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	-	-	-	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. 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. <b>Mitigation:</b> Emerging CPP2 policy on maximising site potential should help to ensure that the full and effective use of sites is made.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	The policy requirements relating to minimum sizes should result in higher quality of housing, across all types, being delivered. 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. 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. The	D	P

				<p>supporting text also refers to starter homes.</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 with protected characteristics, and should therefore have positive impacts on</p>	D	P

				<p>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 at and mitigation

- 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

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

This policy is considered to be linked to option 2 which was the preferred approach

#### Changes between draft CPP2 and Proposed Submission stage CPP2:

- No changes to policy text.
- Clarification changes to supporting text

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 enlarged and thus improved to meet space standards, and where the loss would result in delivery of family-sized homes (e.g. through de-	D	P

				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.		
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.	D	P
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.	D	P
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.

### Recommendations at Proposed Submission Stage and mitigation

- 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.

#### **Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Criteria (a) of policy text amended with minimum floor area required in order for conversion to be allowed reduced from 124sqm to 120sqm.
- Supporting text amended to reflect change and provide clarification regarding protection of smaller dwellings and the need to ensure conversions provide at least one unit of family accommodation.

<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>
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 120m <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	D	P

				<p>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.</p>		
<p>14. To provide housing, including affordable housing, to contribute towards meeting local needs</p>	++	++	++	<p>Converting 1 existing dwelling into 2 or more dwellings can help to boost housing supply, particularly for smaller households, with need for 1 or 2 bedrooomed properties constituting 59% of housing need. In addition, the policy requirements will ensure that smaller dwellings (&lt;120sqm) 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 (e.g. 1-bed of minimum 50sqm plus 2-bed of 70sqm can be provided within the 120sqm threshold). 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.</p>	D	P
<p>16. To improve health and well-being, and reduce inequalities in health</p>	+	+	+	<p>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 (e.g. 1-bed of minimum 50sqm plus 2-bed of 70sqm can be provided within the 120sqm threshold), below which residential amenity and health may be compromised. The policy doesn't include other criteria relating to protection of residential amenity,</p>	I	P

				however these issues will be addressed by other CPP2 policy.		
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 have positive impacts on this objective.	D	P

### 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 new housing provided through conversions meets the minimum 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.

### Recommendations at Proposed Submission Stage and mitigation

- 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.

### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Changes to policy text reflecting there is an identified need for older people’s housing; requirement to provide internal and external communal space as appropriate; deletion of text requiring outdoor landscaped space; deletion of text allowing reduced housing standards where agreed; requirement for development to have regard to HAPPI (Housing our Ageing Population: Panel for Innovation Report) good design principles.
- Changes to supporting text include: evidence of where concentrations of older people exist in the city; reference to and findings of the Older People’s Housing Needs Assessment which found that a wide mix of accommodation options for older people is needed and should be planned for; quantified the amount of housing required over the plan period; and found that affordability is an issue which prevents older people from moving. Text also clarifies that older people’s accommodation falls within both C2 and C3.

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 provide outdoor communal space as appropriate, including space for growing plants and food, 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	++	++	++	<p>The policy will support delivery of housing for older people and will therefore help to address the identified housing needs of this group of people. This need is 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 and also requires housing to have regard to good practice design principles set out in the HAPPI report.</p> <p>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.</p> <p>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,</p>	D	P

				due to lack of move-on accommodation.		
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 to facilities 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. 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 indoor and outdoor communal space will provide the opportunity for interaction, reducing the risk of isolation, also helping to support good mental health.	D	P
17. To improve community safety, and reduce crime and fear of crime	+?	+?	+?	The policy requires development to provide communal outdoor space where appropriate. 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 provides for the housing needs of 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 and exclusion. 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

### 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 may to delivery of communal outdoor 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 at Proposed Submission Stage 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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Policy changes still resists the loss of supported accommodation, however now includes criteria under which loss accommodation will be allowed, which includes demonstrating a surplus, or enabling improved provision.
- Clarification changes to supporting text

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 towards meeting local needs	++	++	++	The policy will support delivery of temporary or permanent housing for people with specific needs, including the homeless and disabled people and will therefore help to address the housing needs of these people.	D	P

				<p>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).</p> <p>The policy resists the loss of supported accommodation, however allows loss where it would result in an improvement to the quality of provision, which should ensure accommodation is of good quality.</p>		
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	++	++	++	<p>Housing is one of the wider determinants of health.</p> <p>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.</p> <p>The policy resists the loss of supported accommodation, however allows loss where it would result in an improvement to the quality of provision, which should ensure accommodation is of good quality.</p>	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 groups 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. In addition, the criteria which allow for loss of poor standard provision, should result improved provision. 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.

### Recommendations at Proposed Submission Stage and mitigation

- There are no recommended changes or requirements for mitigation.

**CPP2 Policy Appraisal: DM6 Build to Rent Housing**

**Options Stage:**

- 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).

The draft version of this policy was considered to be reflective of option 3, however following viability background evidence, the policy was revised prior to Proposed Submission and is now more reflective of option 2.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Deletion of criteria relating to avoiding an over-concentration of build to rent within strategic allocations.
- Deletion of criteria that requires affordable to comply with CP20.
- Amendment to affordable housing criteria, confirming that up to 20% affordable at genuinely affordable rent will be sought subject to viability and consideration of CP20.
- Updates to supporting text regarding rent levels and proportion of affordable housing.
- Updates to supporting text regarding viability background evidence undertaken.
- Updates to supporting text regarding meeting requirements of other policies.

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. The policy would result in delivery of build to rent accommodation including up to 20% 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	++	++	++	House prices continue to rise in Brighton & Hove, with average prices to buy	D	P

<p>affordable housing, to contribute towards meeting local needs</p>			<p>continuing to be between 6 and 16 times the median household income locally.<sup>123</sup> Average rents are also high and continue to rise, with rents representing between 30% and 91% of gross average incomes.<sup>124</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>Local evidence shows strong need for both newly built rented accommodation and for affordable rented accommodation.</p> <p>Policy requirements have been amended and now require a lower proportion of affordable housing compared with draft stage (up to 20% instead of 40%). It is acknowledged that this is based on background evidence on viability, which demonstrated 20% to be viable. However the policy now requires this to be genuinely affordable and therefore may be less than the minimum 20% lower than market value as described in NPPG (with it recognised that housing at this level would not be genuinely affordable locally).</p> <p>Although the lower proportion sought means that less affordable rented housing will be delivered on build to rent schemes as a whole, it should ensure delivery of viable schemes and therefore is more likely to result in delivery of viable schemes rather than jeopardise delivery, and will still result in affordable housing delivery, albeit at a reduced amount than with previous versions of the policy.</p> <p>The policy is still considered to have a significant positive impact on achieving this objective; it supports delivery of this type of housing, still requires delivery of a proportion of affordable rented housing including genuinely affordable housing, and would require the mix to be in accordance with local needs. In addition, it is also recognised that the CP20 target has always been a negotiable target.</p> <p>Impacts should be significantly positive as will help to provide housing in the</p>		
--	--	--	--	--	--

<sup>123</sup> In 2018: average prices as follows: studio flat £181,414 = 6.2xmedian income; 2-bed flat £367,035 = 12.6xmedian income; 2-bed house £396,568 = 13.6xmedian income; 3-bed house £495,226 = 17xmedian income (median household income 29,100) (BH Housing Market Report 2018) House price to income ratio continues to rise.

<sup>124</sup> In 2018, average cost of renting: studio flat was £731 – 30.2% of gross income; 2 bed flat was £1,324 – 54.6% of gross income; 4-bed house £2,199 -90.7% of gross income; all based on median household income of £29,100. (BH Housing Market Report 2018)

<https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/2018%20Housing%20Market%20Report.pdf>

				city.		
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 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, as well as other policy requirements which would support good health including open space and sustainability standards, which should also impact positively on health and well-being of occupants.	I	P
18. To increase equality and social inclusion	++	++	++	Physical and financial access to housing are key contributors to housing based deprivation, which is high locally. 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. Although it is recognised that a lower proportion of affordable housing is now required, this is based on background viability evidence. The policy should still support delivery of this type of housing and help meet local needs for rented accommodation. 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.	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	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 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. The policy now reflects viability evidence and has resulted in a reduction the amount of affordable housing to be delivered in build to rent schemes. This should help ensure that viable schemes come forward and have positive impacts for this objective.	I	P

### 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. Although the policy now seeks a lower proportion of affordable housing than at draft stage, reflecting viability evidence, the policy is still found to be significantly positive for housing,

particularly through the requirements for rents to be genuinely affordable, and is more likely to allow for delivery of BTR developments to come forward, compared to the draft version which could jeopardise delivery based on viability.

- 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, particularly genuinely affordable 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 at Proposed Submission Stage 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)

#### **Changes between draft CPP2 and Proposed Submission stage CPP2:**

- No changes to policy text
- Further clarification added to supporting text with regards requirements for communal space

<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>
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	I	P

				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.		
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. 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.	I	P
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.	I	P

				<p>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.</p> <p>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.</p>		
12. To minimise and sustainably manage waste	-/+	-/+	-/+	<p>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.</p> <p>Mitigation: CPP1 CP8 expects changes of use to minimise waste and facilitate recycling.</p>	I	P
13. To make the best use of land available	+	+	+	<p>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.</p>	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</p>	D	P

				<p>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> <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.</p>		
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	<p>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.</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 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 supporting text also provide further clarification with regards to communal space provision, which should further support good health and opportunities for social interaction. The policy should also minimise the proliferation of</p>	D	P

				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.		
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

### 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, including communal space, 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.

**Recommendations at Proposed Submission Stage and mitigation**

- 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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Additional criterion clarification of communal space requirements for cluster flats and studio flats
- Replacing requirement for ‘on-site’ security presence with effective and ‘appropriate’ provision.
- Removal of requirement for tenancy agreements to last full academic year.
- Consequential amendments to supporting text.
- 

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 LWSs and could be sensitive to any increased	I	P

				recreational pressure. In addition, Stanmer Park is also adjacent to the campus which includes areas of Ancient Woodland and TPOs. Brighton University campus is also adjacent to an SNCI/LWS and 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. Policy also requires PBSA to includes measures which promote sustainable	D	P

				transport use, including measures to prevent students from keeping cars in the city, which should also help promote sustainable travel. 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.		
6. To improve air and noise quality	++	++	++	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.	D	P
8. To reduce the risk from all sources of flooding to and from development	-	-	-	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. Mitigation: CPP1 CP11 Flood Risk requires development to consider previous flooding events and incorporate appropriate mitigation.	I	P
10. To increase the city's resilience and ability to adapt to climate change	-	-	-	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. Mitigation: CPP1 CP11 Flood Risk and CP8 Sustainable Buildings require development to reduce the urban heat island effect and surface water flood risk.	I	P
13. To make the best use of land available	+	+	+	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 housing stock by preventing the need to convert C3 dwellings into HMOs.	I	P
14. To provide housing, including affordable housing, to contribute	++	++	++	The policy sets clear criteria where PBSA will be supported, and should therefore help to bring forward successful applications. The policy does not	D	P

towards meeting local needs				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, including appropriate communal space, which helps to ensure a quality of housing delivered.		
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, including communal space, 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 has been amended and no longer requires there to be on site security, however still requires appropriate security, which could include off-site provision. 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	+	+	+	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 at Proposed Submission Stage 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Removal of ‘improved’ from policy as improvements (e.g. extensions/ enlargements or refurbishments) would not be required to address policy.
- Clarification of circumstances under which partial loss would be allowed, including where continuation of the use would be unviable.

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 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 community facilities, and also resists the loss of community facilities although sets out where loss, including partial loss would be permitted. 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 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	D	P

				detrimental effect on health.		
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 opportunities and meet local employment needs.	+	+	+	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 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.	I	P

### 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 at Proposed Submission Stage and mitigation**

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- No changes to policy text
- Removal of requirements for verification of asking price with the local planning authority in supporting text
- Amendment to supporting text cross-linking to DM40 regarding agent of change principle.

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	+	+	+	Retention of pubs that are located in close proximity to the community it serves	D	P

car, encourage travel by sustainable forms of transport and improve travel choice				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.		
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 to be brought back into active uses.	D	P
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	+?	+?	+?	The policy will lead to the protection of pubs, or will permit change of use to	I	T

inclusion				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.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	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 regeneration opportunities, e.g. with vacant/redundant premises and although the policy will prioritise community uses, this does not preclude other non-community uses. Cross reference in supporting text to DM40 and agent of change principle which help ensure existing premises are protected against future noise complaints from any new development located nearby. Overall impacts should be positive.	D	P

### 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 at Proposed Submission Stage and mitigation

- There are no recommendations or requirements for mitigation.

## Employment, Tourism and Retail Policies

### 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

#### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Clarification that policy applies to B2 and B8 premises.
- Simplification of policy wording to aid clarity.
- Minor amends to supporting text including reference to zero-exhaust emissions infrastructure.

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 addition, the policy itself requires well designed high quality buildings, although this more relates to the internal design of the buildings.</p>	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel	-/+	-/+	-/+	<p>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</p>	I	P

choice				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.		
6. To improve air and noise quality	-/+	-/+	-/+	See Objective 5 for possible transport impacts that may also affect air quality; noted that design-related supporting text refers to changing infrastructure for zero-exhaust emission vehicles which will support air quality improvements. 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 redevelopment of existing floorspace, 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 redevelopment of existing stock, 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	D	P

				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.		
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, B1c, B2 and B8 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 also supports 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 redevelopment of existing premises on protected industrial estates, which could help to bring back vacant/under-utilised buildings back into active uses, should lead to higher density redevelopments; 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, B1c, B2 and B8 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 zero-exhaust emission infrastructure may reduce this, and the 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 at Proposed Submission Stage and mitigation**

- 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 Changes of Use within Regional, Town, District and Local Shopping Centres**

**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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Widening the range of uses A1 units can change to in order to better reflect changes to NPPF/ high streets.
- Simplification of policy wording to avoid duplication.
- Removal of the criteria seeking to avoid 3 or more non A1 uses in regional, district and town centres, except for in the Lanes and North Laines.
- Marketing requirement reduced to 6 months in primary, secondary and local shopping centres.
- Clarification that residential uses would only be permitted above retail unit or to the rear of units in all shopping centres.
- Additional text clarifying that temporary or meanwhile uses will be permitted.
- Consequential amendments to supporting text.

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. In addition, the policy now allows temporary or meanwhile uses. Vacant units within Conservation Areas or	I	T

				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.		
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 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.	I	P
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 requires evidence to be submitted to demonstrate the use is no longer viable (such as 6 months marketing) and this will result in vacancies (e.g. 6 months). This would not be making the best use of land available in the city. However, the policy now also allows temporary or meanwhile uses, which may prevent vacancy and helps to make good use of sites available. On balance the policy is considered to now be more positive and meets the aims of this objective as it does allow for adaptive re-use of A1 units to any other use provided the proportion of A1 units does not fall under a certain amount, as well as allowing temporary uses. The policy should 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 positive.	D	T/P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	+	+	Although not a key objective of this policy, the policy is clear where change of use to residential would be permitted, including above or to the rear of units in shopping centres. This could have positive impacts on this objective.	D	P
15. To improve the range, quality and	++	++	++	The policy should ensure that a balanced mix of uses, including	D	P

accessibility of services and facilities.				<p>predominantly A1 uses is maintained within shopping centres, as well as allows other uses with the mix in accordance with the type of retail centre, e.g. a lower mix of non-A1 uses in the primary frontage of the Regional Centre, but allowing a greater mix within Local Centres.</p> <p>The policy for Town, District and Local Centres, will help to ensure local communities can meet their day to day needs locally.</p> <p>The policy changes between draft and Proposed Submission stage are considered to provide a more flexible approach to change of use, and allow any use to be considered. The policy is considered to have significant positive impacts for accessing services and this objective.</p>		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>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 non-A1 uses in all centres, which could include D uses for example, as described in the supporting text, that would facilitate access to health. The policy should therefore have a positive impact on this objective.</p>	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>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 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. However the policy now allows temporary or meanwhile uses, and this can help reduce this risk.</p> <p>Overall the impacts are considered to be positive.</p>	I	T/P
18. To increase equality and social inclusion	+	+	+	<p>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</p>	I	P

				mix of uses are retained in these centres, which should help people meet certain needs locally. This will have positive impacts 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 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 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. In addition, the policy reflects the unique aspects of certain areas, such as the North Laine, and should assist in maintaining this. The policy allows temporary and meanwhile uses and this can help ensure centres remain active. The policy will also enable other centres to offer a wider mix of A and non 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.	D	P

#### 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, as well as reflects and should maintain unique aspects of other retail areas. 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, best use of land, housing, health, community safety and equalities. The policy may help to prevent vacancy in certain centres, by allowing change of use or allowing temporary uses, 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 flexibility of the policy allowing change of use to other non A uses, as well as allowing temporary uses, should help to reduce vacancy both in the shorter and longer-term and helps to make the best use of land. The policy allows some change of use to housing, having benefits for housing provision. 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 non-A use which may increase access to health for example. The policy should result in a good mix of uses, 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, particularly as the length of time that marketing evidence must be demonstrated has been reduced since draft stage. 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.

#### Recommendations at Proposed Submission Stage and mitigation

- There are no recommendations for changes to the policy or requirements for mitigation.

**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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Clarification that residential uses would be permitted above retail units or to the rear of units in important local parades.
- Additional criteria allowing temporary of meanwhile uses of vacant buildings within retail centres
- Additional Local Parade added; omitted in error.
- Removal of wording “retail” in relation to A1 uses, within supporting text.

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. In addition, the policy now allows temporary or meanwhile uses. 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	D	P

				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 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 and allows temporary or meanwhile uses, again making the most of the building stock.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	+	+	Although not a key objective of this policy, the policy is clear where change of use to residential would be permitted, including above or to the rear of units in shopping centres. This could have positive impacts on this objective.	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 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 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. 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	I	P

				surveillance. In addition, the policy allows change of use, and allows temporary or meanwhile uses, which may help to reduce vacancy. The policy should therefore have a positive impact on this 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 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, and also allows temporary or meanwhile uses, 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

### 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, housing, health, community safety, equalities and economic development. The policy could help to reduce vacancy through allowing change of use and temporary uses, 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 and temporary uses, which should help to reduce vacancy. The policy allows change of use to housing in certain circumstances. 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 through passive surveillance and also promoting economic activity in the area.

### Recommendations at Proposed Submission Stage and mitigation

- There are no further recommendations or requirements for mitigation.

## CPP2 Policy Appraisal: DM14 Commercial and Leisure Uses at 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

Policy reflective of option 2.

### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Changed name of policy
- More flexibility for changes of use to range of commercial and leisure uses to reflect existing range and mix of shopping, commercial and leisure offer
- Allows change of use to residential on upper floors.

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 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 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.	I	P
13. To make the best use of land available	+	+	+	The policy 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	+	+	+	The policy now allows change of use to residential on upper floors which could support provision of housing.	D	P
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 enhance the commercial offer of the Marina and may prevent a predominance of any one kind of use. The types of uses that would be permitted include those that help to improve the vitality of the Marina and	D	P

				could include those more traditionally found in a local/district/town centre, including community uses as well as other non-A1 uses. 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.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy allows change of use and does not specify permitted uses. The supporting text refers to community uses, which 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. Policy also requires an active frontage to be maintained, which can help promote community safety. 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 and should strengthen the commercial activity in the area. 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

### 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, housing, 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 support provision of housing; may improve access to health services such as doctors and dentists; and may help to increase footfall and pedestrian activity, supporting community safety.

### Recommendations at Proposed Submission Stage and mitigation

- There are no recommendations for changes or requirements for mitigation

### CPP2 Policy Appraisal: DM15 Commercial and Leisure Uses on 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

Policy reflective of option 2.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Changed name of policy

**Assumptions**

Site specific 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 LWS covers some of the shingle beach adjacent to Madeira Drive. Development in this location could therefore have potential for direct adverse impacts on this LWS, as well as indirect impacts through the potential for the policy to increase footfall in this location, adding to recreational pressure on the LWS. 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	D	P

				heritage.		
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, although it is recognised that the mix of uses provided in this location could reduce the need to travel elsewhere. Mitigation: Provided by CP9 Sustainable Transport that seeks to promote sustainable travel choice. CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised.	I	P
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	D	P

				more difficult to let. Overall, impacts should be positive.		
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 ensure that there are no harmful impacts on amenity for local residents and visitors, also having positive impacts on health.	I	P
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

### 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 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.

**Recommendations at Proposed Submission Stage and mitigation**

- There are no recommendations for changes to the policy.
- Mitigation should be provided by emerging CPP1 CP10 Biodiversity; CPP2 policy on Green Infrastructure and Nature Conservation; CPP1 CP9 Sustainable Transport; 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**

- No policy framework to assess permanent market applications
- Criteria based policy to assess new permanent markets or extensions to existing markets with no preferred sites identified
- 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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- New reference to impact of cycle routes and provision of cycle parking to be considered with proposals for new or improved markets and market stalls.

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 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. However, a market development could have a positive impact on heritages	I	P

				<p>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 impact is achieved.</p>		
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, cycle routes 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	?	?	?	<p>Market development could help to regenerate derelict sites or areas, however this is fairly uncertain and will depend on the site.</p>	I	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	<p>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.</p> <p>Impacts considered to be significantly positive on this objective.</p>	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</p>	D	P

				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, 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

### 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Removal of word ‘suitable’ for clarity.
- Clarification of wording d) that allows loss where re-provision within a new development

**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.

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. None of the search areas contain biodiversity designations within them, although those within DA2 and DA4 are adjacent to LWS 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 new development reduces the risk of flooding.	I	P
11. To improve soil quality	?	?	?	Some of the search areas could have potential for contamination based on former uses.	I	P

				Emerging CPP2 policy on polluted sites should result in remediation and improved soil quality.		
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.	D	P

## 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.

#### **Recommendations at Proposed Submission Stage and 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.
- No recommended changes to policy

#### **Design & Heritage Policies**

##### **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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Reference to considering the circular economy principles added to policy.
- Simplification and reduction of supporting text to reflect further guidance will be provided in UDF, including references to strategic views and tall buildings being within the UDF.
- Additional supporting text to clarify that choice of materials should be low-maintenance, and that funded maintenance plans may be required.

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 which should also have positive impacts on surrounding streetscape, including heritage assets. Supporting text also refers to maintenance plans being required if necessary, which should ensure visual quality of design of scheme is maintained. Overall, impacts should be significantly positive for 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 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

9. To reduce emissions of greenhouse has emissions that cause climate change.	+	+	+	Design that considers the principles of the circular economy could have positive impacts on this objective, through potential re-use of materials and the saving of energy/carbon associated with production of new materials.	I	P
12. To minimise and sustainably manage waste	+	+	+	Design that considers the principles of the circular economy could have positive impacts on this objective, through potential re-use/recycling of materials and the prevention of waste.	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, reducing greenhouse gas emissions, reducing waste, 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; should reduce greenhouse gas emissions and reduce waste through encouraging reusing/recycling materials where possible in line with the circular economy principles; 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 at Proposed Submission Stage 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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Wording added to clarify role of policy is to avoid underdevelopment of sites
- Policy text now refers to need to take account of SA4 and SA5
- Subsequent changes to supporting text

**Assumptions**

- 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.

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 and enhance 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. 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	+	+	+	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, however the policy wording that requires development to take account of SA5 should prevent this and have	D	P

				positive impacts.		
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,	I	P

				<p>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.</p> <p>Mitigation: emerging CPP2 policy on Amenity should help to minimise the risk of amenity impacts.</p>		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	<p>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.</p>	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, SDNP, 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, whilst ensuring the impacts on landscape are considered. 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 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 at Proposed Submission Stage 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, and emerging CPP2 policy, including those relating to biodiversity and amenity
- No further recommendations.

## CPP2 Policy Appraisal: DM20 Protection of Amenity

### Options Stage

- 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)
- Option 2) Progress Local Plan Policy QD27 into city-wide criteria-based policy
- 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

### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Amendment to policy to clarify that development should not cause 'unacceptable' loss in recognition that some loss of amenity may be acceptable.
- Amendment to supporting text to clarify consultation should be in accordance with the SCI

### 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	-	-	-	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. <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.	I	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	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 & Health.	D	P
17. To improve community safety,	+	+	+	Although the policy seeks to protect amenity, and therefore prevent	I	P

and reduce crime and fear of crime				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.		
------------------------------------	--	--	--	--	--	--

**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 at Proposed Submission Stage and mitigation**

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Inclusion of consideration of 'scale'
- Criteria (c) amended to require materials to complement rather than be sympathetic to the parent building
- Various changes to supporting text to aid consideration of design, including accessible and inclusive design

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 access to it	+	+	+	The policy requires development to be well designed, scaled 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 considered and protected where extensions to buildings are taking place within the setting of the SDNP.	D	P
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, scaled and sited in relation to the surrounding area and that extensions use materials which complement 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 CP8 and states that some standards may apply to larger extensions. This would include water efficiency and is therefore considered to have positive impacts on this objective.	I	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 to CP8 and states that some standards may apply to larger extensions. This would include energy efficiency and is therefore considered to have positive impacts on this objective.	I	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	I	P

				positive impact on this objective.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	+	+	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. 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.	D	P
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 adjoining 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/residents.	I	P
18. To increase equality and social inclusion	+	+	+	Supporting text now refers the need to consider the principles of accessible and inclusive design, which could result in extensions that meet the needs of people with protected characteristics, for example, older or disabled people, or will help to meet future needs.	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, equalities, 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; should result in design that is accessible and inclusive, and could help to improve housing and increase land for commercial uses.

### Recommendations at Proposed Submission Stage and mitigation

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Changes to clarify need to retain, improve and where possible provide landscaping, trees or planting.
- Inclusion of reference to natural capital.
- Reference to planting of wildlife/ pollinator friendly non-native species.
- Requirement for net gains in biodiversity and enhancements to green infrastructure.

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 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 now also specifically seeks to ensure net gains are provided. 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	+	+	+	Landscape design can be used to help integrate new development into the	I	P

historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites				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.		
6. To improve air and noise quality	+	+	+	Biodiversity performs various natural ecosystem services, including absorbing air pollutants and can help to reduce noise. The policy should therefore have an indirect positive impact on this objective.	I	P
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	I	P

				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.		
--	--	--	--	---	--	--

### 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 at Proposed Submission Stage 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

### Changes to policy between draft CPP2 and Proposed Submission stage CPP2

- Changes to clarify temporary security measures.

- Simplification of wording regarding application to shopfronts in town centres
- Additional text regarding to use of artificial lighting relating to highlighting heritage assets
- Deletion of un-necessary supporting text
- Cross reference to DM40 regarding avoiding light pollution

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 and considerations 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.</p> <p>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</p>	D	P

				disabled people and older people who may have mobility difficulties. 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.	+	+	+	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

### 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.

### Recommendations at Proposed Submission Stage 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 of the draft policy “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.” Although this has been deleted from the Proposed Submission stage, this does not change the SA score as the policy text still refers to accessibility.

### 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Additional criteria added to require consideration of sounds or animation.
- Amendments to policy to clarify that adverts outside built up area must respect setting of South Downs National Park.
- Advertisements must not distract road users (strategic route network).
- Clarification/ simplification of supporting text.
- Reference to geographical signage added to supporting text

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 should ensure advertisements outside the built up area have limited illumination, 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 discrete and 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.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy and supporting text recognises the potential for advertising to have amenity impacts, such as those arising from light or noise, and requires consideration of illumination, noise and animation. This should help to ensure these forms of potential pollution do not arise and therefore has a positive impact on health.	I	P
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, sited or distracting advertisements and now requires advertisements that are visible from the SRN to ensure distraction of road users does not occur. 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
---	---	---	---	---	---	---

#### Summary

- The policy should result in positive impacts for the objectives relating to SDNP, heritage/townscape, health, 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, requires consideration of amenity impacts such as those caused by lighting and noise, and should help to bring forward successful applications, which will help to promote economic activity.

#### Recommendations at Proposed Submission Stage 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

#### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Clarification and consistency of wording – unacceptable impacts. Include reference to associated ancillary development.
- Remove duplication of policy requirements for satellite antenna
- Policy wording on digital connectivity amended to ensure policy is implementable.
- Consequential amendments to supporting text including consulting with those who have a visual interest in the 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	+	+	+	Policy should help to protect and conserve biodiversity through the requirement for there to be no 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 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, and 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. 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 at Proposed Submission Stage and mitigation**

- No 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- No changes to policy text
- Reference in supporting text supporting contemporary and innovative design approaches.
- Reference in supporting text regarding conservation of traditional features on rear elevations.

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 the retention of trees and gardens within Conservation 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.	D	P
2. To protect and improve open space	+	+	+	Some Conservation Areas include areas of open space and this can form part	I	P

and green infrastructure and improve sustainable access to it				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.		
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. Also encourages preservation of features on rear elevations within supporting text. The policy also supports demolition or improvement 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 account and should lead to high quality design all of which contribute positively towards this objective.	D	P
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	+	+	+	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	I	P

economy, increase employment opportunities and meet local employment needs.				conservation areas and this will have an indirect positive effect on this objective by supporting on-going heritage-based tourism.		
---	--	--	--	--	--	--

**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 at Proposed Submission Stage and mitigation**

- 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.

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Reference in supporting text supporting contemporary and innovative design approaches.

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	++	++	++	<p>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.</p> <p>The policy should therefore result in conservation and protection of listed buildings and should help to protect and strengthen local character.</p>	D	P
12. To minimise and sustainably manage waste	+	+	+	<p>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 in demolition and production of waste.</p>	I	P
13. To make the best use of land available	+	+	+	<p>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.</p>	D	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	+	+	+	<p>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.</p>	I	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	<p>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.</p>	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 at Proposed Submission Stage and mitigation**

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Clarification that policy requires the potential for retention and reuse to be explored in order for an informed and balanced judgement to be made.
- Consequential changes to supporting text.

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 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.	D	P
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	I	P

				further explanation regarding the requirement for satisfactory evidence to justify demolition. Overall impacts are considered to be positive.		
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 make best use of existing building stock having a positive impact on this objective.	D	P
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.

### Recommendations at Proposed Submission Stage and mitigation

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- No changes to policy.
- Amendments to supporting text to support where appropriate bold architectural approaches and that other considerations may be applicable

**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	D	P

				ensure the heritage asset itself is protected.		
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 policy 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 policy 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 policy 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 opportunities and meet local employment needs.	+	+	+	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 having a positive impact on this objective.	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 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 at Proposed Submission Stage 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Policy includes expectation that applicant should demonstrate that alternative, non-registered sites have been considered and assessed.
- Consequential changes to supporting text.

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.	D	P

				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.		
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 policy should result in the preservation and enhancement of RP&G.	D	P
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	+	+	+	Allowing temporary uses within RP&G contributes towards making the best	I	T

available				use of land available.		
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 at Proposed Submission Stage and mitigation

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- No changes to policy or supporting text.

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 opportunities and meet local employment needs.	+	+	+	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, which should assist in bringing forward appropriate development, having economic benefits.	I	P

### 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 at Proposed Submission Stage 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**

### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Clarification to policy wording that proposals should be informed by adopted Conservation Plan.
- Amendment to criteria to ensure a clutter free environment and net gains in biodiversity.
- Inclusion of new criterion that regard should be had to the impact of temporary events on planting and biodiversity.
- Consequential changes to supporting text.

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 heritage planting and seek net gains to biodiversity within the gardens. This policy also requires proposals for temporary planning to have regard to potential impacts on planting and biodiversity. Policy 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, including reducing clutter, and restore areas of the Royal Pavilion itself and has requirements relating to temporary uses and the impacts of these on Estate, including on planting which makes an important part of the scheme. 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	D	P

				the Estate. Overall the policy should have significant positive impacts on this objective.		
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 accessibility of services and facilities.	+	+	+	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
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

## 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 at Proposed Submission Stage and mitigation**

- There are no further recommendations for changes or requirements for mitigation

**Transport & Travel Policies**

**CPP2 Policy Appraisal: DM33 Safe, Sustainable and Active Travel**

**Options Stage**

- Option 1: No additional policy – rely on CPP1 Policy CP9
- Option 2: Policy setting more detailed requirements regarding safe and sustainable/active travel

This policy is considered to be linked to option 2

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Clarification on certain policy provision 1b); 2b) and 3b) apply ‘where appropriate’.
- Clarification that cycle parking provision should be universally accessible.
- Within provision for cyclists, additional wording regarding extending existing networks

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	D	P

				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.		
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.	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 a range of measures that development should contribute towards or deliver where appropriate, 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 cycling facilities, accessible public transport facilities, extended public transport routes and improved interchanges.	D	P
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 inclusion	++	++	++	The policy seeks to deliver measures that would facilitate travel on the 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.	D	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 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 at Proposed Submission Stage and mitigation**

- There are no recommendations or requirements for mitigation

#### **CPP2 Policy Appraisal: DM34 Transport Interchanges**

**Options Stage:** Park & Ride, Coach and Lorry Park:

- Option 1: General criteria based policy in support of developments
- Option 2: Specific site allocations
- Option 3: No policy

This policy is considered to be linked to option 1 which was the preferred approach.

#### **Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Minor wording changes to aid clarity of policy
- Inclusion of footnote referencing relevant government guidance.
- Supporting text confirming that impacts on designated sites and landscapes will be evaluated.

### 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	+	+	+	It is considered highly unlikely that any type of interchange would be built on a site with nature conservation importance. Recognised that supporting text requires evaluation of impacts on designated sites, should result in positive impacts through protection of biodiversity. Generic development impacts on biodiversity would be addressed through CP10.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	It is considered highly unlikely that any type of interchange would be built on designated open space. Recognised that supporting text requires evaluation of impacts on designated sites including LGS. Impacts should be positive through protection of open space.	I	P
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. Recognised that supporting text requires evaluation of impacts on designated sites including the SDNP. This should ensure that the impact is positive 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	+	+	+	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.  In addition, there is some evidence which suggests that P&R can have a positive effect on the historic cores of towns and cities, due to a reduction	D	P

				in traffic in these locations.		
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 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 at draft stage/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>	D	P
6. To improve air and noise quality	+	+	+?	Freight consolidation centres/management is a measure referred to in the Strategic Transport Assessment 2013 (and update 2014) that is likely to	D	P

				<p>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>		
7. To improve water quality (ecological, chemical and quantity status)	-?	-?	-?	<p>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>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>	I	P

				Overall impacts could be positive.		
10. To increase the city's resilience and ability to adapt to climate change	-?	-?	-?	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. <b>Mitigation</b> Mitigation considered to be provided by CPP1 Flood Risk and emerging CPP2 policy on SUDS.	I	P
11. To improve soil quality	?	?	?	Development of transport interchanges could result in remediation of contaminated land, depending on the site developed and is therefore uncertain. <b>Recommendation at draft stage</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.	D	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	+	+	+	Based on the assumption that Park & 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. 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. Freight consolidation centres/management is a measure referred to in the	I	P

				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.		
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. In addition, it is noted that the policy point e) requires that the sites are safe and secure, which should help support community safety.	D	P
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 biodiversity, opens space, 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 biodiversity, open space and SDNP through the requirement to evaluate any impacts and to minimise visual impacts; should protect the historic built environment and through the requirement to minimise visual impacts and 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 at Proposed Submission Stage and mitigation**

- 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.
- No further recommendations

#### **CPP2 Policy Appraisal: DM35 Travel Plans & Transport Assessments**

##### Options Stage Travel Plans

- Option 1: No additional policy – rely on CPP1 Policy CP9 (para 2c: major development required to submit a TA and implement agreed Travel Plans)
- Option 2: Policy regarding the submission, thresholds and content for Transport Assessments, Statements and Travel Plans
- Option 3: 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.

#### **Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Amendments to policy clarifying requirements for Transport Statements/ Transport Assessments in relation to Air Quality Management Areas to include consideration where development is outside AQMA.
- Require proposals that cause significant noise/air quality impacts to submit a Construction and Environmental Management Plan.
- Reference to impact of SRN to be considered in assessments in consultation with Highways England.
- Amendment of wording from “should” to “to be required” relating to policy point 1 (all development which may result in significant movement)
- Amendment of wording form “should” to “is required” relating to policy point 3 (major development in AQMA)

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. Policy requires all major development within AQMA to include a TA/TS. 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 was further broadened out following consultation to be more encompassing for development elsewhere to considers impacts on the AQMA regardless of proximity. This is considered to strengthen the policy further. Additionally, the policy now requires proposals that could cause significant air or noise quality impacts to submit a Construction and Environment Management Plan.	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.

**Recommendations at Proposed Submission Stage and mitigation**

- 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

**Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Amendments to policy regarding requirements for development to be permit-free where overspill parking may be an issue;
- New policy point in support of car-free residential development, with additional supporting text
- Guidance in supporting text regarding parking surveys
- Supporting text references changed to zero exhaust emissions vehicles from ultra-low emissions vehicles and supporting infrastructure.

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 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 may be overspill parking to be permit-free meaning that future residents will not be able to apply for a	D	P

				<p>parking permit (within a CPZ) and also shows strong support for car-free residential development.</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 zero-exhaust, e.g. charging points, which could have localised air quality benefits. Impacts considered to be significantly positive.</p>	I	P
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	<p>The policy sets maximum standards for car parking and minimum standards 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.</p> <p>The policy could therefore help to reduce or minimise transport based carbon emissions having a positive impact on this objective.</p>	I	P
13. To make the best use of land available	+	+	+	<p>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.</p>	I	P
15. To improve the range, quality and	+	+	+	<p>The Appendix sets out car parking standards for various uses, including e.g.</p>	D	P

accessibility of services and facilities.				<p>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.</p> <p>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.</p> <p>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.</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 inclusion	+	+	+	<p>The policy considers the needs of disabled people, with specific reference to 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>	D	P
19. To contribute towards the growth	+	+	+	Congestion has a direct impact on the economy. This option could lead to	I	P

<p>of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>			<p>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>		
---	--	--	---	--	--

**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.

**Recommendations at Proposed Submission Stage and mitigation**

- There are no recommendations or requirements for mitigation.

## Environment & Energy Policies

### 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.

#### Changes between draft CPP2 and Proposed Submission stage CPP2:

- Policy sections revised, with new sub-headings for “Green Infrastructure” and “Nature Conservation” to add clarity
- New section added to “Green Infrastructure” requiring GI to be integral to design and layout, and to achieve a variety of sustainability benefits.
- Section on “Nature Conservation” now requires all development to conserve and enhance, rather than protect and prevent damage to, features; also requires: net gains in biodiversity, protection of priority species/habitats; management secured; control of invasive species. Deletion of text “where possible”.
- Marine and coastal biodiversity, and geodiversity added to the list of features that should be supported and enhanced.
- Division of a) international, b) national, and c) local sites to aid clarity, with specific criteria which must be met for each.
- International sites section now also refers to the need for HRA, will only allow development if there is no alternative solution; and requires adequate compensatory provision. Reasons for overriding public interest now relate to public health or public safety.
- National sites section now requires development to avoid impacts on sites, refers to the need for benefits to clearly outweigh the impacts, for on/off-site mitigation to result in a net gain, and the need for EIA. Former text that required there to be overriding benefits of national importance deleted.
- Local sites section clarifies that sites which are not allocated in DPD must demonstrate exceptional circumstances that outweighs adverse impacts, for on/off-site mitigation to result in a net gain, and for an Ecological Impact Assessment. Former text that required there to be overriding benefits of either regional or citywide importance deleted.
- Deletion of text that previously required greater reductions in CO2 emissions and improvements to public appreciation of the site from proposals that cause harm to a designated site.
- Various changes to supporting text to reflect policy changes including references to net gains, further clarification of priority species with additional species added including sparrows, reference to including swift bricks/boxes in development, further reference to the mitigation hierarchy, clarification of the provision of on-site mitigation where possible, and confirmation of update of Nature Conservation SPD.

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>There are two aspects of this policy; the first should result in significant positive effects for this objective as is concerned with safeguarding existing and incorporating new green infrastructure, should result in net gains in biodiversity, the protection of priority species, management of habitats and invasive species control, and enhancements to various components such as the NIA, protected species, ancient woodland, marine biodiversity etc.</p> <p>It is recognised that the second part of this policy sets out criteria which must be met in order for development to be permitted on designated sites, including criteria for international, national, and locally designated sites. Although this part of the policy sets the framework for when proposals on sites of nature conservation importance will be permitted, the approach for each type of site is considered to be sufficiently strong, reflects the importance of the type of site, and requires an appropriate level of assessment to assess potential impacts (e.g. HRA/EIA). In addition, for all sites, the final paragraph requirements should ensure that the objectives of the designations are not undermined, that funded management plans are in place, and that losses can be mitigated to achieve net gains. The fact that the objectives of the designations cannot be undermined should ensure that sites are protected, the management-plans should ensure that sites are enhanced in the long term, and should result ensure opportunities to deliver net gains are provided. This part of the policy is therefore considered to also have positive impacts for this objective when considered against the SA framework.</p> <p>Overall the policy should have significant positive impacts on this objective.</p>	D	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	-/+	-/+	The section of this policy concerned with green infrastructure should result in direct positive results for this objective; it should result in the safeguarding of various elements of the existing green infrastructure network, including open spaces and should result in GI being integrated into schemes. In addition, the	I/D	P

				<p>policy should lead to enhancements in green infrastructure including the NIA, ancient woodland and trees.</p> <p>However, if development is allowed on designated sites, this will result in a net loss of open space, as many designated nature conservation sites are also designated as open space, having indirect adverse impacts, and unlike the biodiversity element there are no requirements within the policy for this open space loss to be mitigated. Adverse impacts are not anticipated to be significant.</p> <p>Mitigation provided by CPP1 CP16 Open Space which requires allocate sites to have regard to maintaining some open space, and for new development to contribute to provision of open space.</p>		
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	<p>As described in the policy, some nature conservation sites are within the administrative area of the city, but fall within the planning boundary of the SDNP.</p> <p>This policy only applies to those sites that are within the City Plan planning boundary.</p> <p>It is recognised that some sites are situated within both the City Plan and SDNP planning areas, such as Sheepcote Valley LWS, Wild Park LNR, Bevendean Down LNR, and Bevendean Horse Paddocks LWS. The policy should therefore have positive impacts on this objective, as may help to protect the setting of the SDNP, particularly where designated sites span the two planning areas.</p>	I	P
6. To improve air and noise quality	+	+	+	<p>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 reduce noise nuisance. The policy recognises the importance of green infrastructure in relation to providing natural capital and is predominantly concerned with the protection of the green infrastructure network which performs various functions. The policy should therefore have indirect positive impacts on this objective.</p>	I	P
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>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 providing natural</p>	I	P

				capital and is predominantly concerned with the protection of the green infrastructure network which performs various functions. The policy should therefore have indirect positive impacts on this objective.		
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 providing natural capital and is predominantly concerned with 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 text no longer requires developments within nature conservation designations to achieve greater reductions in CO2 emissions than set out in CPP1 CP8 Sustainable Buildings. However, the supporting text refers to opportunities to deliver higher reductions and links to DM44. This will have a positive impact on this objective where implemented.	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 providing natural capital and is predominantly concerned with 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 and its role as natural capital. The retention and enhancement of the natural capital of the area, with it being recognised that green infrastructure has multiple benefits and provide multiple functions helps to make the best use of land and is considered to have indirect positive impacts on this objective.	I	P
16. To improve health and well-being,	+	+	+	Access to the natural environment and green and open spaces have	I	P

and reduce inequalities in health			<p>documented benefits for both physical and mental health and well-being. The policy should lead to the protection of the wider green infrastructure network, which provides opportunities for physical activity. The policy also indirectly helps to maintain a healthy environment by reducing environmental pollution, such as air and noise pollution, helps to maintain urban temperatures, and helps absorb water and reduce flood risk, which will become increasingly important with climate change.</p> <p>It is recognised that the policy allows development on designated sites, which would result in some losses in open space, however this is not considered to result in adverse health impacts when balanced with the positive health benefits the policy will bring. Overall impacts considered to be positive.</p>		
-----------------------------------	--	--	---	--	--

### Summary

- The policy is considered to have significant positive impacts on the biodiversity objective. This reflects the overall positive aspirations of the policy, which should result in safeguarding of existing, and incorporation of new, green infrastructure, also having wider biodiversity benefits; the fact that the policy should enhance various nature conservation features, such as protected species and habitats, and ancient woodland. It also reflects the strong criteria based approach which sets out the requirements that proposals must meet in order for development on designated sites to be approved; this should ensure the objectives of the designations are not undermined, should secure long-term enhancement through management, and should achieve net gains in biodiversity. Additional wording added as a result of the SA at Proposed Submission stage should ensure that the requirements for mitigation and net gains apply to all sites, including those allocated.
- The policy should also have a range of positive impacts on objectives that relate to the natural capital 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, through references in the supporting text for developments to achieve greater reductions in CO2 emissions; contributes to make good use of land available, through multi-functional nature of green infrastructure; and could positively impact upon the SDNP through the protection of sites of nature conservation importance located at the boundary which may also contribute to its landscape value.
- The policy should also have positive impacts for health, through protection of green infrastructure that provides opportunities for physical activity, through the improvement in environmental quality and ensuring resilience to climate change that is delivered through natural capital, and due to the link between accessing the natural environment and good mental health and well-being.
- The policy is considered to have mixed impacts on the objective for open space. This reflects the positive aspirations of the policy in relation to safeguarding the green infrastructure network and integration of green infrastructure into schemes; however also reflects the nature of the policy which allows development on nature conservation sites under certain circumstances and resultant losses in open space that would arise, as the majority have an open space designation, which is not required to be mitigated within the policy.

### **Recommendations at Proposed Submission Stage and mitigation**

- The SA at Proposed Submission stage recommended that a further requirement relating to mitigation and achieving net biodiversity gains was added to the final paragraph to ensure this applied to all sites. This was added as suggested.
- Mitigation for any losses in open space should be provided by CPP1 CP16 Open Space which seeks to ensure losses are minimised and results in improvements to remaining open space.

### **CPP2 Policy Appraisal: DM38 Local Green Space**

#### **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.

#### **Changes between draft CPP2 and Proposed Submission stage CPP2:**

- Additional paragraph added clarifying that development within an LGS will not be permitted unless there are very special circumstances where public benefits outweigh the harm.
- Footnotes added to direct to NPPF policies regarding how development within LGS is managed and to provide examples of what constitutes an enhancement.
- Additional text added to final policy paragraph reflecting the need for development to have met the very special circumstances test.
- Supporting text amended to reflect the greater protection afforded to the designation; to clarify that development should be compatible with the designation; reference to the NPPF regarding the need for consistency with LGS designations and wider planning policy; additional text relating to provision of outdoor sports facilities at Benfield Valley.

<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	+	+	+	All four sites designated as LGS contain some natural/semi-natural open space, and/or are a LWS, and/or are a Local Nature Reserve, and therefore all have some kind of ecological value, as well as acting as wildlife corridors	I	P

				linking to the SDNP. Although it is recognised that the policy permits development in special circumstances, however 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.		
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 including accessibility. Although it is recognised that the policy permits development in special circumstances, this must be compatible with the designation and should lead to long term enhancements in open space. Overall impacts are considered to be significantly positive.	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 or adjacent to 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 Areas 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.	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	+	+	+	Although the Local Green Space designation protects these spaces as a "green space", the supporting text refers to two sites adjacent to the two of the LGS having housing potential. Although this won't be provided within the LGS, it will be adjacent and may require access through the LGS.	I	P
15. To improve the range, quality and	+	+	+	Supporting text now refers to the provision of outdoor sports facilities at	I	P

accessibility of services and facilities.				Benfield Valley, which should help maintain or improve access to these services.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Access to open and green space contributes significantly towards physical health and mental well-being. The Local Green Space designations should ensure that the sites continue to provide opportunities for activity and recreation, supporting health, as well as providing wider environmental benefits, that also support 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, access 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. Policy should help maintain or improve access to sites as a form of outdoor sports space. Access to open space contributes towards good physical health and mental wellbeing.
- The policy also has positive impacts on the objective for housing delivery, as although the sites will be protected as a green space through the LGS designation, some areas adjacent to the sites have been identified as having potential for housing and access may be required through it.

### Recommendations at Proposed Submission Stage 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

**Changes between draft Plan and Proposed Submission Plan stages**

- Addition to criterion d) of access routes.
- Reference in policy to Beachy Head West Marine Conservation Zone.
- Additional supporting text referencing council work to improve access onto the beach.
- Simplification of supporting text.

**Assumptions**

- This assessment focuses on the specific impacts of development in the seafront location. Assume generic impacts of development will be mitigated )

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 SNCIs 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, and specifically refers to developments having regard to the Beachy Head West MCZ. 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, including onto the shingle for disabled people, older and younger people, through requiring proposals to	D	P

				maintain and enhance public access to and along the coast and beach. This should have a positive 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	-	-	-	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 that development maintains or improves coastal defences and reduces vulnerability to flood risk. 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.	D	P
10. To increase the city's resilience and ability to adapt to climate change	++	++	++	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	D	P

				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 access and escape routes in case of flooding events. 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.		
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 accessibility of services and facilities.	+	+	+	The policy should lead to enhanced access to the seafront and to sea-based activities and should therefore contribute positively towards this objective.	D	P
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. In addition it requires development to include safe access and escape routes, protecting health.	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 at Proposed Submission Stage 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.

#### **Changes between draft Plan and Proposed Submission Plan stages**

- Inclusion in criterion d) to consideration of impact of lighting on biodiversity in particular priority habitat and species.
- Inclusion of criterion f) confirming that new biomass combustion or CHP plants will not be acceptable in or near AQMA or near sensitive receptors (e.g. near Royal Sussex County Hospital)
- Amendments to supporting text to clarify the agent of change principle and protect existing noisy uses.
- Additional supporting text clarifying NPPF guidance regarding air pollutants should be addressed through all developments
- Schools added as an additional example of a sensitive receptor within supporting text

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>The policy should ensure that new development does not give rise to any type of pollution that would cause unacceptable harm to biodiversity, including lighting, and also requires that proposals are designed to alleviate any existing problems.</p> <p>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.</p>	D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	<p>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 the impact of light pollution on the SDNP and have a positive impact on this objective.</p>	D	P
6. To improve air and noise quality	++	++	++	<p>The policy is considered to have a particularly strong focus on air quality, and 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. The policy will prevent any new biomass combustion or CHP plants from being implemented in or near to AQMAs or sensitive receptors (such as the hospital) which will have prevent NO2 levels from worsening in these areas.</p> <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</p>	D	P

				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. In addition the policy should also minimise the likelihood of development being subject to existing noisy, e.g. through avoiding locating development in close proximity to uses that generate noise nuisance. The policy should therefore have significant positive impacts on this objective.		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	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. Policy should therefore have positive impacts on water quality.	D	P
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	Although the policy prevents biomass combustion and CHP plants from being incorporated within development in certain areas, due to air quality impacts or impacts on sensitive receptors, this is not considered to have a negative impact on this objective as the supporting text highlights the other forms of carbon reduction technologies that could be considered instead. Impacts considered to be neutral overall.	I	P
11. To improve soil quality	+	+	+	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. Policy should therefore have positive impacts on soil quality.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	The policy should ensure that new development does not give rise to any form of pollution that would cause unacceptable harm to health, safety and	D	P

				<p>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. The policy also prevents certain types of energy combustion from being installed in certain areas, including the AQMA but also near sensitive receptors, which should further protect the health of people there, with specific references to hospitals and schools. In addition, the policy should prevent development sensitive to noise pollution from being located in proximity to uses that could generate noise, or require developers to mitigate the potential for noise impacts, reducing the likelihood of impacts of noise on health.</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 significant positive impacts for air quality, as should ensure that new development does not give rise to air pollution, and has various requirements that should help to meet Air Quality Action Plan targets, improve air quality and ensure the impacts on sensitive receptors is considered.
- Policy should have positive impacts on the following objectives: biodiversity, SDNP, water quality, soil quality, health and safety. The policy should ensure that new development does not give rise to various forms of pollution such as noise and light pollution, that can cause harm to various receptors, including people and the various aspects of the natural environment, such as biodiversity, water and land, and 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.

### Recommendations at Proposed Submission Stage 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.

**Changes between draft Plan and Proposed Submission Plan stages**

- Clarification that policy is seeking to protect natural capital and the quality of the environment.
- Include definition of natural capital in footnote.

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 seeks to protect natural capital which includes 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 policy seeks to protect natural capital which includes water. 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	++	++	++	The policy seeks to protect natural capital which includes soils. 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	D	P

				use of existing sites and buildings in the city.		
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 seeks protection of natural capital and 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 also seeks protection of natural capital, which includes biodiversity.
- 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 at Proposed Submission Stage 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

#### **Changes between draft Plan and Proposed Submission Plan stages**

- Inclusion reference to water 'quantity' in policy.
- Amendments to policy wording regarding phasing of waste water infrastructure to align with occupation of development and also streamline wording to avoid duplication.

<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	+	+	+	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 has an unacceptable impact on water	D	P

				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.
- 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 at Proposed Submission Stage and mitigation

- No further recommendations or requirement for mitigation.

**CPP2 Policy Appraisal: DM43 Sustainable 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.

**Changes between draft Plan and Proposed Submission Plan stages**

- Amendment to policy to clarify that subterranean development if not permitted where other sources (in addition to groundwater) flooding have occurred.
- Amendment to policy clarify proposals should provide where possible improved biodiversity.
- Changes to supporting text to clarify certain types of SUDs more appropriate than others given aquifer.

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 provide improved biodiversity where possible. For instance, SUDS can include vegetative 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	+	+	+	The 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 promote enhanced landscape/townscape which should lead to improved built environment.	D	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 and other sources 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 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.</p>	D	P
11. To improve soil quality	+	+	+	<p>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</p>	I	P

				can otherwise contain contaminants.		
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

### 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 at Proposed Submission Stage and mitigation

- There are no further recommendations or requirement for mitigation.

**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

**Changes between draft and Proposed Submission Plan stage**

- Policy amended to add flexibility for any future changes in building regulations. Inclusion of footnote
- Additional policy paragraph to reflect council’s ambition to become carbon neutral by 2030 and to encourage all to improve energy efficiency.
- Confirmation that technical guidance will be prepared to clarify expectation regarding Energy Statements
- Clarifications in supporting text to some aspects of implementation.
- Supporting text wording amended to confirm council will reduce rather than mitigate carbon emissions
- Further detail added regarding spending of funds gathered through carbon offset scheme.
- Additional supporting text reflecting policy wording and council ambition to become carbon neutral.

**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	-?	-?	-?	<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 access to it	-?	-?	-?	<p>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.</p> <p>Mitigation:  CPP1 policy SA5 should ensure that development does not have an adverse impact on the setting of the SDNP.</p>	I	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 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.</p> <p>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.</p>	I	P
6. To improve air and noise quality	-	-	-	<p>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.</p> <p>Provision of this type of technology in industrial estates, as suggested by the policy, would be compatible with surrounding uses.</p> <p>Mitigation:  Emerging policy on Protection of Environment and Health should address any potential noise impacts.</p>	I	P
9. To reduce emissions of greenhouse gases that cause climate change	++	++	++	<p>48% of residential development in 2016/17 was through conversions and changes of use which did not have to meet any additional carbon reductions 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</p>	D	P

				<p>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, as well as encouraged in other areas in support of the carbon neutral ambition. Policy now clearly states aim of becoming a carbon neutral city by 2030 and sets out position in terms of encouraging all development to improve efficiency.</p> <p>Policy should have significant positive impacts on achieving this objective through reducing carbon emissions.</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 through conversions and changes of use, help to address the risks of fuel</p>		

				poverty and reduce health inequalities for future occupants.		
--	--	--	--	--	--	--

### 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 also actively encourages incorporation of renewables in certain areas as well as encourages all development to achieve greater reductions from fabric efficiency. This should lead to greater reductions in CO2 emissions from energy consumption.
- 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.

### Recommendations at Proposed Submission Stage and mitigation

- There are no recommended changes to policy.
- 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.

### 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.

### Changes between draft and Proposed Submission Plan stages

- No changes to policy (further footnote added for clarification)
- No changes to supporting text

#### 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 access to it	-?	-?	-?	<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> <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> 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>	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes,	-?	-?	-?	<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</p>	I	P

buildings and archaeological sites				design. Impacts are also uncertain as would depend on the scale and location of installation. <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.		
6. To improve air and noise quality	-?	-?	-?	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. <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.	I	P
9. To reduce emissions of greenhouse gases that cause climate change	++	++	++	This policy would enable installation of low/zero carbon energy 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.	D	P
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	+/-?	+/-?	+/-?	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	I	P

				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. 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. <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.		
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 at Proposed Submission Stage and mitigation**

- 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

**Changes between draft and Proposed Submission Plan**

- Policy amended to require that proposals ‘must’ meet CHP Quality Assurance standards
- Policy amended to ensure development demonstrate suitability to a future connection.
- Supporting text amended to include reference to low-carbon heat networks for clarification

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	I	T

				<p>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.</p> <p>Impacts will depend on what is implemented and where.</p> <p><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.</p>		
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 this objective.	I	P
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 at Proposed Submission Stage and mitigation**

- No further mitigation

## Special Area policy

### 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

#### Changes between draft and Proposed Submission stages:

- Policy amended to include reference to enhancing wildlife connectivity and buffer zones;
- Policy amended to show encouragement for including housing for older people.
- Paragraph added to supporting text to reflect ANA designation and potential for archaeology.
- Additional supporting text requires protection and enhancement of existing public rights of way

#### 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	-	+	+	Site is a LWS, containing 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. 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	D	P

				<p>low and that impacts could be mitigated through measures such as green roofs, 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 biodiversity, including wildlife connectivity, 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 in the medium to longer term, but are likely to be adverse in the short-term.</p>		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	+	+	+	<p>Site is publicly 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 combined residential potential for the sites is 100 dwellings (as shown in policy H2). 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. In addition, the supporting text draws attention to the ANA and the potential for archaeology on certain parts of the site. 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 also 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, and also requires PROX to be protected. 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.</p> <p>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>125</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.</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 do not have any risk of surface water flooding. The areas with potential for development have a medium risk of groundwater emergence.</p>		

<sup>125</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.

				<p>There are no additional specific policy requirements relating to reducing flood risk within the policy although it is noted that policy H2 includes groundwater flooding as a consideration.</p> <p>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.</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 e.g. temperature regulation and absorption of water. Development of parts of the site therefore may impact on climate change adaptation 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.</p> <p>Overall, the policy is considered to have mixed impacts on this objective.</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 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	+	+	+	<p>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.</p>	I	P
13. To make the best use of land	+	+	+	<p>The site is currently in open space uses. Delivery of 100 dwellings on a part of</p>	D/I	P

available				the site would equate to c.63dph on that part, 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.		
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 and the policy now supports the inclusion of housing for older people, which would also support 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. Supporting text also requires existing PROW network to be protected, which should ensure there is no loss of access. 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,	+	+	+	Bringing vacant and derelict buildings back into use can reduce the risk/fear of	I/D	P

and reduce crime and fear of crime				crime. Therefore the repair and restoration of Benfield Barn could contribute 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 could 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 as well as supports housing for older people.
- The policy was found to have potential for positive effects for biodiversity in the longer term 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>126</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>127</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>126</sup> Urban Fringe Assessment 2015

<sup>127</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 from adjacent SRN, which could impact upon occupier amenity. 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 surface water flooding. The risk of groundwater flooding is addressed through consideration in policy H2.

#### **Recommendations at Proposed Submission Stage and 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. In addition, the supporting text refers to the need for a transport assessment.

#### **Strategic Mixed Use Sites Policies**

##### **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.

#### **Changes between draft and Proposed Submission Plan stages:**

- Requirement for Heritage Impact Assessment added;
- Amendments to criterion a) regarding enhancing the most significant non-designated heritage assets

- Amendment to criterion b) regarding creation of openings in the wall, for clarification.
- Amendments to criterion c) regarding improving publicly accessible open space
- Criteria f) and g) added to address waste water infrastructure requirements;
- Criteria h) added to address site specific biodiversity and green infrastructure requirements (including swift colony).
- Consequential changes to supporting text, including reference to potential for contaminated land.

**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	+	+	+	The site is PDL comprised of buildings with some areas of amenity greenspace. The site is known to hold around 15 swift nests; swifts are a BAP species. The policy now reflects this and includes new criteria to safeguard the swift colony. This should have positive impacts. In addition, the policy now requires green infrastructure and wider landscaping, that will also provide opportunities for enhancing the ecological value of the site.	D	P
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 publicly accessible 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. In addition, the policy now requires green infrastructure to be incorporated resulting in 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 are no additional policy requirements relating to landscape within the 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,	+	+	+	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	D	P

buildings and archaeological sites				specific requirements relating to the designated and non-designated heritage assets on the site, including a Heritage Impact Assessment, and should lead to the preservation and potential enhancement of these assets and surrounding townscape.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	<p>The policy includes provision for a minimum of 200 dwellings, health, care and community facilities. These types of uses 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.</p> <p>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.</p> <p>Emerging CPP2 policy would require a Transport Assessment to be submitted which should help to address transport impacts.</p>	D	T/P
6. To improve air and noise quality	-/+	-/+	-/+	<p>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>128</sup> However it is noted that the policy includes requirements that should improve sustainable transport provision which could influence travel choice. Impacts considered to be mixed.</p>	I	T
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>The site is not within a GSPZ.</p> <p>The policy now requires phasing of development to align with improvements to sewerage network, as well as requirements for layout to reflect sewerage access. This should have positive impacts for water quality.</p> <p>There are no additional specific policy requirements relating to water resources within the policy.</p>	D	P

<sup>128</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.

				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.		
8. To reduce the risk from all sources of flooding to and from development	+	+	+	<p>The site has some small areas of low (3% of site at 1:1000 risk) to medium (1% of site 1:100 risk) of surface water flood risk on site. Groundwater levels are more than 5m below surface.</p> <p>Level 1 SFRA found overall risk of flooding on site to be low. SFRA Level 2 noted flood risk of surrounding properties which may be affected by development due to topography and made suggestions for SUDS.</p> <p>It is noted that the existing open spaces on the site will be retained and these will contribute towards absorbing surface water and in reducing surface water flood risk. The policy also now requires green infrastructure to be incorporated, which could support flood risk reduction.</p> <p>There are no additional specific policy requirements relating to flood risk within the policy however following SA recommendation on an earlier iteration, the supporting text includes a reference to making use of opportunities to incorporate SUDS within the open space and landscaping improvements, which should have positive impacts on this objective.</p> <p>Overall the policy should have indirect positive impacts for this objective.</p> <p>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>	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. The policy requirements relating</p>	I	P

				to green infrastructure will also support climate change adaptation. Incorporation of SUDS within these open space improvements would further strengthen these positive impacts. (see objective 8).		
11. To improve soil quality	+	+	+	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, however the supporting text refers to the potential for contamination and the need for remediation. Emerging CPP2 policy on Polluted Sites should ensure that any necessary remediation takes place if required.	I	P
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. Also, the inclusion of green infrastructure within landscaping, including green roofs, green walls and SUDS would provide multi-functional benefits.	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 in accordance with CP21 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 informal 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	D	P

				access to health provision. Policy should result in provision of housing, which is 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. Inclusion of any green infrastructure into an existing urbanised environment would have also have well-being 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 biodiversity, open space, heritage, flood risk, water quality, soil quality, climate change adaptation, waste, best use of land, access to services, community safety, equalities and employment objectives. The policy should lead to protection and enhancement of the swift colony and result in increased ecological value of the site through green infrastructure. The policy should lead to protection and improvement of existing on site open space, improve access to children's play-space within the area and incorporate green infrastructure. The policy

should lead to the preservation and enhancement of on-site heritage assets. Retention of open space as well as addition of green infrastructure 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 ensure protection of water through sewerage and phasing requirements. The policy reflects the potential for contamination on site and should result in appropriate remediation. The policy should lead to protection of areas and inclusion of new 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 SDNP and energy consumption due to lack of site constraints or policy wording relating to these objectives. Impacts on these objectives are largely addressed through implementation of CPP1 policies.

#### **Recommendations at Proposed Submission Stage and 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.
- Redevelopment of the site could increase the risk of surface water flooding elsewhere, particularly due to the site's topography. Mitigation would be provided by emerging CPP2 policy on SUDS which requires there to be a reduction in surface water leaving a site and it is noted the supporting text refers to SUDS.
- No further recommendations at this stage

#### **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.

#### **Changes between draft and Proposed Submission Plan stages**

- Clarification of criterion g) to enhance setting of nearby heritage assets.

- Including of criteria i) in relation to waste water infrastructure requirements
- Inclusion in supporting text to potential for contaminated land.

**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 current potential for biodiversity on site. The site is in fairly close proximity to the Brighton Station LWS 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 that this will enhance the settings of nearby heritage assets. Additionally, the policy requires improvements to the pedestrian environment	D	P

				along New England Road, which should help to improve the streetscape in this area which is currently poor.		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	D	P/T
6. To improve air and noise quality	-/+	-/+	-/+	<p>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.</p> <p>The site is located within the AQMA. The adjacent streetscape on New England Road may inhibit dispersal of air pollutants.</p> <p>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>129</sup> The policy requires the local air quality to be taken into account and seek improvements/mitigation.</p> <p>Overall impacts for this objective (noise and air quality) are mixed. See mitigation/recommendation.</p>	D	P/T
7. To improve water quality (ecological, chemical and quantity)	+	+	+	<p>The site is not within a GSPZ.</p> <p>The policy now requires phasing of development to align with improvements to</p>	D	P

<sup>129</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.

status)				<p>sewerage network. This should have positive impacts for water quality. There are no additional specific policy requirements relating to water 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>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>No risk of surface water flooding on site. Groundwater levels than 5m below surface.</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 although it is noted that the policy requires incorporation of green infrastructure which could reduce flood risk.</p> <p>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 England Quarter &amp; 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.</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. Any new development on site is likely to achieve a much greater energy efficiency than the existing premises.</p>		
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	<p>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.</p>	I	P

11. To improve soil quality	+	+	+	The site may have potential for contamination due to industrial uses which would require remediation. There are no additional specific policy requirements relating to remediation of contaminated land within the policy, however the supporting text refers to the potential for contamination and the need for remediation. Emerging CPP2 policy on Polluted Sites should ensure that any necessary remediation takes place if required.	I	P
12. To minimise and sustainably manage waste	-	-	-	Redevelopment of the site would not present the opportunity to convert any of the existing buildings and therefore will result in production of waste having adverse impacts. 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.	I	P
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 the site and the other uses to be delivered on site which would reduce the land available for housing. Overall impacts should be positive.	D	P
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 55dcbL 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.	D	P

				<p>The site is within the AQMA and air pollutants can have a detrimental impact on respiratory health – see Objective 6.</p> <p>Policy should result in provision of housing and employment opportunities, both of which are wider determinants of health.</p> <p>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.</p> <p>Overall impacts on health are considered to be positive.</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 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.</p>	I/D	P
18. To increase equality and social inclusion	+	+	+	<p>Provision of housing will include a proportion of affordable units in accordance with CPP1 CP20 which will support people on lower incomes.</p> <p>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 (site is in close proximity to some SOAs within 20% most deprived employment/education domains).</p>	D	P
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	<p>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.</p>	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, water quality, climate change adaptation, best use of land, soil quality, 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. Policy should ensure water quality is protected and that any contamination is remediated appropriately. 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.
- Policy could have adverse impacts on waste reduction as does not present the opportunity to make use of existing buildings on site.

### Recommendations at Proposed Submission Stage and 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.
- Mitigation relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan.
- No further recommendations at this stage

### 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.

#### Changes between draft and Proposed Submission Plan stages

- Addition to criterion d) in relation to biodiversity and green infrastructure requirements.
- Including of criterion h) and i) in relation to waste water infrastructure requirements
- Inclusion in supporting text of including SUDS, potential for contaminated land and further guidance on design principles and nearby heritage assets.

#### 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	+	+	+	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. The policy now requires green infrastructure and wider landscaping, that will also provide opportunities for enhancing the ecological value of the site. Impacts should be positive.	D	P

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. Policy also requires incorporation of green infrastructure. 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, reflected in the supporting text. 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. The supporting text sets out design principles for the site, with considerations for heritage assets. In addition policy requirements for incorporation of green infrastructure and improvement of public realm and for development to be coherent should have a positive impact on streetscape/townscape. Impacts should be positive.	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 impacts are therefore considered to be mixed. See mitigation.	D	P
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	I	T/P

				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>130</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.		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	The site is not within a GSPZ. The policy requires the development to be phased to align with improvements to sewerage infrastructure and to allow access to future infrastructure, which should help to maintain water quality. There are no additional specific policy requirements relating to water 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 flooding including 1% of land at high risk (1:30yr event), 2% of land at medium risk (1:100yr event) and 14% in low risk (1:100yr event). Groundwater levels vary on site; between 0.5m-5m and >5m below surface. The entire site is PDL and of a completely urbanised form. Development on the site will therefore not result in an increased urbanised environment. Level 1 SFRA found overall flood risk on site to be low. SFRA Level 2 undertaken as a strategic site and suggested surface SUDS such as swales and other green infrastructure such as green roofs would support drainage control.	D	P

<sup>130</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.

				<p>The SA at Proposed Submission stage suggested the policy could be stronger and refer the need to reduce surface water flood risk on site. This resulted in additional text being added to the supporting text for development to incorporate SUDS in accordance with DM43. This should have positive impacts on this objective.</p> <p>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 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>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 due to existing urbanised form. Policy now requires incorporation of GI, and 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. Following SA recommendation, supporting text also refers to incorporation of SUDS.</p>	I	P
11. To improve soil quality	+	+	+	<p>The site may have potential for contamination, based on some existing industrial uses and the supporting text now refers to this potential and requires remediation where necessary.</p> <p>Any contaminated land would require remediation in accordance with other CPP1 policy.</p>	I	P
12. To minimise and sustainably manage waste	-	-	-	<p>Redevelopment of the site would not present the opportunity to convert any of the existing buildings and therefore will result in production of waste having adverse impacts.</p> <p>Requirements relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste &amp; Minerals Plan, and</p>	I	P

				therefore the policy itself does not include any additional specific policy requirements relating to waste reduction.		
13. To make the best use of land available	+	+	+	The policy requires delivery of 300 homes and 5,700sqm B1a office 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.	D	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	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.	D	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	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.	D	P
16. To improve health and well-being, and reduce inequalities in health	++	++	++	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.	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 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.	I/D	P

18. To increase equality and social inclusion	+	+	+	Provision of housing including a proportion of affordable housing in 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.	D	P
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 biodiversity, open space, heritage (streetscape), flood risk, climate change adaptation, water quality, soil quality, community safety, best use of land, equalities and economic development objectives. The policy requires green infrastructure and achievement of BAP objectives; 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 and also sets principles for development which should ensure impact on heritage assets is considered. Reference to incorporating SUDS helps address flood risk on site, and additionally planting of street-trees could help support climate change adaptation. Sewerage infrastructure should maintain water quality and policy should ensure the potential for contamination is considered. 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 waste reduction as redevelopment of some sites will not present an opportunity to make use of existing buildings on site.

#### **Recommendations at Proposed Submission Stage and mitigation**

- Following SA recommendation at Proposed Submission stage, an additional paragraph was added to the supporting text to reflect SFRA findings and recommendations to seek appropriate SUDS to help reduce the risk of surface water flooding and support climate change adaptation, linking to DM43.

#### **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.
- Mitigation relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan.

#### **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.

##### **Changes between draft and Proposed Submission stages:**

- Amendment to criteria on air quality to strengthen requirements.
- Inclusion of criterion h) in relation to biodiversity and green infrastructure requirements.

- Including of criterion i) and j) in relation to waste water infrastructure requirements
- Consequential amendments to supporting text and inclusion in supporting text to incorporate SUDS and to potential for contaminated land.

**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	+	+	+	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. The policy should now lead to enhanced green infrastructure and biodiversity through policy requirements. Impacts should be positive. Net gains in biodiversity could be achieved on site through implemented of CPP1 CP10.	D	P
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 should lead to enhanced green infrastructure through policy requirements. 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 and green infrastructure 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	0	0	0	The site does not contain any heritage assets and is not immediately adjacent to any heritage assets, although could be within the setting of the Hove		

assets and their settings, townscapes, buildings and archaeological sites				<p>Station Conservation Area.</p> <p>Development in this location is considered generally unlikely to have any impacts upon heritage assets although would be dependent on scale. There are no additional policy requirements relating to heritage assets within the policy. CPP1 CP15 sets the strategic requirements relating to heritage.</p> <p>Overall the policy is considered unlikely to have any additional impacts on this objective.</p>		
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 and cyclist links which should facilitate access on foot or by bike, in particular improving links to Hove Station. Following SA recommendation on an early draft, the policy was amended to require 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 requires impacts upon local air quality to be taken account and seeks improvements in air quality. This should result in positive effects. However, the amount of development proposed for the site</p>	D	T/P

				<p>could result in an increase in vehicle movements, resulting in mixed impacts overall.<sup>131</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.</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> <p>The policy now also requires the development to be phased to align with improvements to sewerage infrastructure and to allow access to future infrastructure, which should help to maintain water quality. In addition, the supporting text now refers to the potential for contamination and need for remediation, which will further support water quality.</p> <p>Overall impacts should be 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. A small area (5% of site) is at low risk (1:1000yr event). 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 increase in urbanised environment, however presents an opportunity to reduce flood risk through SUDS etc. Level 2 SFRA undertaken as a strategic site and suggested SUDS would support drainage control, although would need to be compatible with the GSPZ.</p> <p>Noted that the policy now requires green infrastructure to be strengthened and enhanced.</p>	D	P

<sup>131</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>The SA at Proposed Submission stage suggested the policy could be stronger and refer the need to reduce surface water flood risk on site. This resulted in additional text being added to the supporting text for development to incorporate SUDS in accordance with DM43. This should have positive impacts on this objective.</p> <p>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. Also, noted that the site is within DA6 which requires development to address surface water flooding.</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 much greater energy efficiency than the existing premises.</p>		
10. To increase the city's resilience and ability to adapt to climate change	+	+	+	<p>Site is PDL and of low surface water 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 due to its existing urbanised nature, although it is recognised that any increased mass could exacerbate heat island effect.</p> <p>The policy now includes a specific requirement relating to green infrastructure which will support climate change adaptation, and supporting text refers to including SUDS.</p> <p>In addition, CPP1 CP8 requires all development to address climate change adaptation which would be applied.</p>	D	P
11. To improve soil quality	+	+	+	<p>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 now refers to the potential for contamination and need for remediation and should have positive effects on this objective.</p>	D	P
12. To minimise and sustainably	-	-	-	<p>Redevelopment of the site would not present the opportunity to convert any</p>	I	P

manage waste				<p>of the existing buildings and therefore will result in production of waste having adverse impacts.</p> <p>Requirements relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste &amp; Minerals Plan, and therefore the policy itself does not include any additional specific policy requirements relating to waste reduction.</p>		
13. To make the best use of land available	++	++	++	<p>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 138dph which exceeds City Plan targets for development within Development Areas. Overall impacts should be significantly positive.</p>		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	<p>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.</p>		
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	<p>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.</p>		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>The site suffers from high levels of noise predominantly from the adjacent railtrack. The WHO suggests that continued exposure to noise over 55dcbIs 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.</p> <p>The site is within the AQMA and air pollutants can have a detrimental impact on respiratory health – see recommendation relating to Objective 6.</p> <p>Policy should result in provision of housing and employment opportunities, both of which are wider determinants of health.</p> <p>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.</p> <p>Overall impacts on health are considered to be positive. See recommendation relating to objective 5.</p>	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 of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	The policy will result in loss of some A1, B1c and B8 uses however will result in delivery of 6,000m2 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.	D	P

### 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 biodiversity, open space, flood risk, climate change adaptation, water quality, soil quality, health, community safety and equalities objectives. The policy should enhance biodiversity and green infrastructure also helping to adapt to climate change, 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. Supporting text refers to incorporating SUDS which should help address any flood risk, also supporting climate change adaptation. 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, and the policy now refers to the need to connect to wastewater, also helping support water quality. The policy supports remediation of a contaminated site, improve soil quality and also protecting water quality. 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 and cycle access which could influence travel choice and also seeks to improve air quality. Following earlier 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, having associated air quality impacts. 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 could have adverse impacts on waste as redevelopment does not present the opportunity to make use of resources or buildings on site.
- The policy currently has no impacts on some objectives including SDNP and energy consumption. Impacts on these objectives are largely addressed through implementation of CPP1 policies.

#### **Recommendations at Proposed Submission Stage and mitigation**

- Following SA recommendation at Proposed Submission stage, an additional paragraph was added to the supporting text to reflect SFRA findings and recommendations to seek appropriate SUDS to help reduce the risk of surface water flooding and support climate change adaptation, linking to DM43.

#### **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. Mitigation relating to waste reduction at construction and operation stages are included within CPP1 CP8 and the Waste & Minerals Plan

#### **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

#### **Changes between draft and Proposed Submission Plan stages**

- Policy reference to refurbishment, restoration and revitalisation of terraces being a key council priority added
- Clarification on small/ boutique hotels

- Reference to cycling infrastructure added
- Reference to event and shared space improvements
- Greater detail on biodiversity/ landscaping improvements, including reference to the Green Wall LWS
- Consequential amendments to supporting text, and reference to incorporating SUDS.
- Additional text clarifying funding available from the council for restoration.

### 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 Green Wall LWS and is adjacent to the Volk Railway LWS. The policy requires development to conserve and enhance the biodiversity in the area, making a specific reference to the Green Wall LWS. The supporting text refers improving the Green Wall LWS and areas of ecological importance including vegetated shingle and following SA recommendation also refers to adjacent Volks Railway LWS. Impacts therefore considered to be positive as should result in enhancements to locally designated sites and may help to improve access to biodiversity.	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. In addition, the enhancement of local biodiversity, including the green wall, would improve green infrastructure.	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 although the east of the site allocation is within fairly close proximity to the SDNP, development of the scale anticipated in this location should not impact upon the SDNP.		
4. To protect and conserve the city's historic built environment, heritage	++	++	++	Madeira Terrace is a grade II listed structure including 151 arches, promenade with raised walkway and associated buildings and lifts. Madeira Terrace has	D	P

assets and their settings, townscapes, buildings and archaeological sites				<p>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.</p> <p>The policy confirms that the refurbishments and restoration of the Terraces is a key council priority. It 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.</p>		
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 boutique/small hotel. 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, including for cyclists and pedestrians, 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</p>	I	T/P

				<p>result of increased transport movements. In addition, the location of retail and leisure uses in a cluster away from residential development, can help to 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	+	+	+	<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>Groundwater levels between 0.5m and 5m therefore risk of groundwater emergence. Development in this location is unlikely to increase risk of flooding, due to existing urbanised nature, however could reduce the risk of flooding if SUDS implemented.</p> <p>The SA at Proposed Submission stage suggested the policy could be stronger and refer to the need to reduce surface water flood risk on site. This resulted in additional text being added to the supporting text for development to incorporate SUDS in accordance with DM43. This should have positive impacts on this objective.</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>	D	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</p>		

				development which would be applied where relevant. Overall the policy itself 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	+	+	+	There are no additional specific policy requirements relating to climate change adaptation, however policy should enhance green infrastructure, which supports climate change adaptation, and now requires landscaping opportunities to include shelter/shade, as well as SUDS, which will also support adaptation to increased heat or weather.	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	+	+	+	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 cyclists and 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 development to support public realm improvements, including lighting, which	I/D	P

				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, and this is referred to in the supporting text, 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 biodiversity, heritage, access and economic development objectives. The policy should lead to conservation and enhancement of biodiversity, including locally designated sites and internationally rare habitats. 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 access to open space, transport, air/noise quality, flood risk, waste, best use of land, climate change adaptation, health, community safety and equalities. 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 having health benefits; 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 improve green infrastructure and shading which can support climate change adaptation; supporting text seeks incorporation of SUDS which should help reduce flood risk and adapt to climate change; 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.

#### **Recommendations at Proposed Submission Stage and mitigation**

- SA of a revised draft at Proposed Submission stage recommended that the supporting text could include references to adjacent LWS to strengthen requirements, which was added as suggested.
- Following SA recommendation at Proposed Submission stage, an additional paragraph was added to the supporting text to seek appropriate SUDS to help reduce the risk of surface water flooding and support climate change adaptation, linking to DM43.
- No further mitigation

#### **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

##### **Changes between draft and Proposed Submission Plan stages:**

- Policy amended to clarify the main and ancillary uses permitted.
- Additional criterion c) relating to density of development respecting the open character and allowing for sea views to be maintained.
- Further detail on biodiversity improvements, including reference to the Volks Railway LWS
- Consequential supporting text improvements.
- Supporting text added to clarify temporary consent granted for outdoor swimming pool on site.

##### **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 LWS lies adjacent to the site. Following SA recommendation on an early draft, the supporting text was amended to include a reference to the LWS. Additionally, a new criteria was added to the policy which requires development to conserve and enhance biodiversity in the area. This was amended further following consultation to refer explicitly to vegetated shingle and the LWS. This should have a significant 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. and the policy now also refers to development being an appropriate density to support the open character of the seafront,		
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 policy now also requires development to be of an appropriate density which should respect the open character of the area and allow for sea views. The supporting text specifies that development should be primarily one storey	D	P

				and not exceed the height of the middle promenade, which should help to achieve this objective.		
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, 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.	D	P
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 an 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 has no risk of surface water flooding. Groundwater levels between 0.5-5m below surface therefore there is a risk of groundwater 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.		

				<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 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</p>	D	P

				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.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The site is allocated for leisure or cultural uses. No housing will be delivered on the site.		
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 (D2), heritage and arts (D1) appropriate to the seafront location, as well as supporting ancillary retail uses. 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 Yellow-wave and mini golf), supporting their economic growth. The policy is therefore considered to contribute significantly positively towards this objective.	D	P

### Overall Summary

- The policy was found to have significant positive impacts for biodiversity and economic development. The policy should help to enhance and conserve biodiversity, including the LWS and internationally rare habitats. The policy should help to ensure the seafront continues to be a year-round destination with a wide offer and may help to increase footfall to the area, having wider economic benefits.
- The policy was found to have positive impacts across all other 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.
- **Recommendations at Proposed Submission Stage and mitigation**
- No further recommendations or requirements for mitigation

**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.

**Changes between draft Plan and Proposed Submission Plan stages:**

- Inclusion of text to allow other ancillary uses in addition to B1a and D1.
- Clarification in criterion b) that proposals should enhance heritage assets and provide visual connectivity to the South Downs National Park
- Removal from criteria e) of specific examples of creative landscape solutions.
- Consequential amendment to supporting text to address the setting of the National Park and provide information on the sites location within a Groundwater Source Protection Zone, seek appropriate SUDS, and ensure that development does not have an impact on the Falmer A27 interchange.

**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)

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. 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 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, and should result in design that enhances 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 and the supporting text requires there to be no adverse effect on the Falmer interchange, 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 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	D	P

				<p>movements to have the potential of having 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 GSPZ1, 2 and 3. 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. Additional supporting text provides further strength and should ensure that resources are protected. Mitigation: also provided through emerging CPP2 policy on Protecting the Water Environment.</p>	D	T
8. To reduce the risk from all sources of flooding to and from development	+	+	+	<p>Part of the site has low risk (1 in 1000yr event) of surface water flooding. Groundwater levels are between 0.025m and 0.5m on part of the site meaning there is a higher risk of groundwater emergence. It is noted that the SFRA considered the site to have an overall low-risk and did not required further consideration by the sequential/exception tests.</p> <p>Development in this location will increase the amount of hard-surfacing and could increase flood risk.</p> <p>The SA at Proposed Submission stage suggested the policy could be stronger and refer to the need to reduce surface water flood risk on site. This resulted in additional text being added to the supporting text for development to</p>	D	T

				incorporate SUDS in accordance with DM43. This should have positive impacts on this objective. Mitigation: CPP1 CP11 Flood Risk and emerging CPP2 policy on Sustainable Urban Drainage should also ensure that impacts are mitigated.		
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 such as incorporation of SUDS. 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 and 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, as well as other ancillary uses, will help to increase provision and access to these facilities for nearby communities.	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Delivery of health facilities will help to increase provision and access to these 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.	I	P
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

### 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 and for the performance of the interchange to be maintained. 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 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 was amended following Proposed Submission stage SA assessment to incorporate wording that was found to have positive impacts on the flood risk objective, as although there is a low to medium risk of surface and groundwater flooding across the site, the supporting text should ensure that this risk is reduced through SUDS.
- 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.

#### **Recommendations at Proposed Submission Stage and mitigation**

- Following SA recommendation at Proposed Submission stage, an additional paragraph was added to the supporting text to seek appropriate SUDS to help reduce the risk of surface water flooding and support climate change adaptation, linking to DM43.
- No further requirements for mitigation.

## Housing Allocations Policies

### 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.

#### Changes between draft Plan and Proposed Submission Plan stages:

- Requirement for development on some sites to align with sewerage network reinforcement
- Requirement for development on some sites to ensure layout allows future access to water infrastructure
- Additional supporting text highlighting the potential for contamination on some brownfield sites
- Additional supporting text highlighting the need to protect groundwater resources when located within a GSPZ
- Table 5: Residential Site Allocations, and Table 6: Mixed Use Allocations: quantum updated for some sites to reflect recent planning consents or other evidence.
- Table 5: Residential Site Allocations, and Table 6: Mixed Use Allocations: 2 sites deleted as follows: 46-54 Old London Road; 270 Old Shoreham Road to reflect availability within plan period.
- Table 5: Residential Site Allocations: site deleted as follows: 251-253 Preston Rd; Baptist Tabernacle; Selsfield Drive; Land at Downsman Pub; to reflect commencement of planning consent.
- Table 5: Residential Site Allocations: 2 sites added: RSCH outpatients and Royal Mail, Denmark Villas.
- Table 6: Mixed Use Allocations: 1 site deleted: The Astoria, to reflect commencement of planning consent.
- Overall quantum total amended to 1,057 (residential) and 519 (mixed use) = total 1,576 (previously 1,609).

#### 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 39 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/+	+	<p>The majority of the housing and mixed use sites (36 out of 39) are previously developed sites and development is considered unlikely to adversely impact upon biodiversity and offers potential to achieve net gains.</p> <p>It is recognised that some of the sites (3 out of 39) include green open spaces which could have potential for ecological interest, or include trees subject to a TPO, and development on these sites could therefore result in an immediate loss in biodiversity. In addition, 1 of these sites has been recently designated a Local Wildlife Site (land between Marine Drive and The Cliff) and any development would need to ensure the reasons for the designation are not compromised.</p> <p>On balance, the policy is more likely to have no impacts or have positive impacts on this objective, particularly in the longer term, as provides the opportunity to improve and increase biodiversity.</p> <p><b>Mitigation:</b> Any potential for adverse impacts on biodiversity would be addressed by other policies within CPP1 and CPP2 including CP10, DM22 and DM37, with all development requiring to provide net gains for biodiversity.</p>	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	+	<p>The majority (32 out of 39) of the housing and mixed use sites are previously developed sites that do not contain any type of open space designations. 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 on-site open space due to the size of the sites.</p> <p>Of the 7 sites containing open space; 4 contain publically accessible open space and 3 contain private areas of designated open space.</p> <p>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.</p> <p><b>Mitigation:</b> 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.</p>	I	P
3. To protect, conserve and enhance the South Downs National Park and	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	I	P

its setting, and improve sustainable access to it				sensitivities. 2 out of 39 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.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-/+/0	-/+/0	-/+/0	14 out of the 39 sites do not contain nor are in proximity to any heritage or archaeological designations and are unlikely to have any adverse impact. 25 of the sites contain a heritage asset, are in the setting of a heritage asset, and/or contain archaeological potential. Of these, 10 do not have a current planning consent or application under consideration and are therefore found to have potential for adverse impact on these assets. The remaining 15 sites containing or adjacent to a heritage asset all benefit from planning consent; the impacts on heritage assets have been found to be positive for 7 of these sites; and mixed/negative for 8 of these sites. Overall, impacts are considered to be mixed. Any adverse impacts on heritage or archaeology would be addressed through CPP1 CP15 Heritage and draft CPP2 policies.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	The majority of the sites (35 out of 39) are considered to have close access to a bus service providing a frequent service every 10 minutes; some sites also have good access to rail services, both of which may influence sustainable travel choice. The majority of sites are also considered to be within desirable or acceptable walking distance from essential services. Some of the sites promote mixed uses, which can help reduce the need to travel. 4 sites either do not have access to a regular bus service, or are located some distance from other services which may influence less-sustainable travel choice. On balance, the policy is considered to have significant positive impacts on this objective as the accessible location of the sites in combination with proximity to sustainable transport, may influence car ownership and reduce the need to travel by car for some journeys. Although it is recognised that the increased population arising from delivery of over 1,500 dwellings will result in an increase journeys made, some of which are likely to be by car, however this has been considered more broadly under the SA of CPP1.	I	P
6. To improve air and noise quality	--/+	--/+	--/+	17 of the 39 sites are located within or adjacent to the AQMA and also have noise (road/rail) issues. 9 of the sites have air quality issues but not noise; 4 of the sites have noise issues but not air. Only 9 of the sites are both outside the	I	T

				<p>AQMA and had low noise levels.</p> <p>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, draft CPP2 policy on Transport and Travel and Protection of the Environment &amp; Health.</p>		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>33 of the 39 sites are not within a either 1, 2 or 3 of a Groundwater Source Protection Zone. 6 of the sites are within a GSPZ.</p> <p>Development could impact upon water quality where located within the GSPZ. The supporting text now refers to the need for groundwater resources to be protected where located within a GSPZ which should impact positively on this objective. In addition, the policy text now requires waste water infrastructure and sewerage network reinforcement to be considered, which will also help to protect the wider water environment.</p> <p>Policy requirements in addition to the location of sites should result in positive effects for the water environment.</p> <p>Any potential for adverse impacts on water quality would be addressed by draft CPP2 policy Protection of the Water Environment.</p>	D	P
8. To reduce the risk from all sources of flooding to and from development	-/+	-/+	-/+	<p>7 of the 39 sites have no risk of any form of flooding</p> <p>10 of the 39 sites have no risk of tidal or surface water flooding and have groundwater levels more than 5m below ground therefore posing a minimal risk.</p> <p>17 sites have either a risk of surface water and/or has groundwater levels less than 5m below surface, but the SFRA considered the flood risk to be low and did not require further consideration by the sequential/exceptions test.</p> <p>1 site has a risk of tidal flooding and the SFRA required further consideration of the site by the sequential/exceptions tests.</p>	I	P

				<p>4 sites have either a risk of surface water flooding or have groundwater levels less than 5m below surface, and the SFRA required further consideration of the site by the sequential/exceptions tests.</p> <p>The SFRA therefore found 34 of the sites to either have no risk or low risk of flooding; 5 sites had to be considered further by the sequential/exceptions tests which concluded that the sites were suitable for allocation based on wider sustainability benefits.</p> <p>Overall, the impacts are considered to be mixed but the SFRA has helped to demonstrate that the majority of sites have low or no flood risk.</p> <p>The risk of on-site flooding and increasing flooding elsewhere would be addressed through CPP1 CP11 Flood Risk and draft CPP2 policy Sustainable Drainage.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	-/+	-/+	-/+	<p>20 of the 39 sites are located within heat cluster opportunity areas and may therefore have potential to connect to future networks where provided, helping to mitigate climate change impacts.</p> <p>19 sites are located outside these areas and are unlikely to be able to connect due to their location; however, of these 10 have planning consent, and 7 of these incorporate some LZC technologies into the consented scheme.</p> <p>Overall impacts are considered to be mixed.</p> <p>Mitigation would be provided through CPP1 policy CP8 which requires certain sustainable buildings standards, and through draft 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 (32 out of 39) consist of previously developed land, comprising existing buildings or cleared ground which does not contain any open space designations. 7 of the 39 sites contain some open or green spaces, which will perform ecosystem services such as water absorption or temperature regulation which may be lost through redevelopment.</p> <p>The majority of site have either no or low risk of flooding.</p> <p>On balance, the policy should have positive impacts on climate change adaptation; it will not result in significant losses in green infrastructure, and will provide the opportunity for net gains through planting and green infrastructure.</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 uses of the site where known and whether these had potential to result in soil</p>	I	P

				<p>contamination.</p> <p>21 of the 39 sites may 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. None of the sites contain grade 3 or higher agricultural land, therefore will not result in loss of land with agricultural value.</p> <p>Overall impacts are mixed positive and neutral towards improving soil quality. In addition, new supporting text requirements relating to remediation of contaminated land should impact positively where relevant.</p>		
12. To minimise and sustainably manage waste	-	-	-	<p>9 of the 39 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 24 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>18 of the 39 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 and land available in the city. The remaining 21 sites are in use, and therefore may result in the loss of that use, however in all 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 39 sites to deliver a minimum of 1,570 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 sites</p>	D	P

				<p>delivering between 10 and 14 units. In addition, the policy also allocates 8 sites being delivered by the council including through the New Homes for Neighbourhood scheme, which delivers 100% affordable rented homes, as well as schemes that provide housing for vulnerable people.</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 some housing types for older people, such as sheltered housing. It also includes self-build.</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. 27 of these sites are in desirable or acceptable walking distance to all of the above essential services.</p> <p>Overall, impacts are considered to be significantly 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 under objective 15, all of sites have good access to various services which also has a positive impact on health and could facilitate sustainable travel.</p> <p>30 of the sites were located in areas with noise and/or air quality issues which could impact upon health and amenity and would require mitigation through design, assessed through air quality 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, draft 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>9 of the 39 sites are 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>	I	P

				<p>The majority of the sites (30 out of 39 sites) are located within areas where crime deprivation is not within the 10 or 20% most deprived SOA, crime domain.</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>7 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; 1 other site is also being delivered by the council for people in temporary accommodation, therefore helping to meet the need of vulnerable people.</p> <p>24 out of the remaining 31 sites could provide 15 or more units and therefore have potential to deliver 40% affordable housing in accordance with policy CP20, which should also help to reduce housing inequalities and particularly supports people on lower incomes in the city to access housing; 30% affordable housing would be sought on the remaining 7 sites.</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.</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. The policy could therefore help to meet the needs of these people with protected characteristics and would depend on market bringing forward these schemes.</p> <p>Some of the sites are located in areas with a high level of employment and/or education deprivation, and most are located in fairly close proximity to areas of high employment and/or education deprivation and may therefore provide the</p>	I	P

				opportunity to increase skills of locally deprived communities, e.g. through the Local Employment Scheme, although would be dependent on take-up.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	-/+/0	-/+/0	-/+/0	<p>12 of the sites could have a positive impact on this objective as the allocation should result in increase in employment floorspace or an improvement in the quality and type of employment floorspace, due to the indicative requirements to provide other uses.</p> <p>10 of the 39 sites have potential for adverse impact on this objective as the site allocated is currently in active B use or if vacant, was previously in B use, and the housing or mixed use development could result in net loss employment floorspace on these sites.</p> <p>17 of the 39 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>	D	P

### Overall Summary

- The policy was found to have potential for significant positive impacts for the housing objective; sites allocated could deliver more than 1,500 dwellings, including sites which will deliver 100% affordable rented accommodation, and larger sites that should deliver 40% affordable housing.
- On balance, the policy was found to have significant positive impacts for reducing the need to travel and access, as most of the sites allocated had good access to public transport and are considered to be within walking distance from some essential services such as schools, shops and health facilities which can influence travel choice.
- 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 those requiring emergency temporary accommodation, and also allocates sites in areas of employment and skills deprivation where opportunities through the Local Employment Scheme could be sought.
- 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 on some sites, which also supports community safety.
- On balance, the policy was found to have positive impacts for health, due to proximity to services which could support active travel, and through the delivery of housing and opportunities for employment both of which are wider determinants of health. It is recognised that some sites have either air and/or noise quality 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, would not involve a loss of green infrastructure and most are considered to have an overall low flood risk.
- The policy was found to have positive impacts for water quality, through new policy and supporting requirements that should protect and improve water quality, as well as through the location of sites, the majority of which are located outside a groundwater source protection zone.

- 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 nor 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 lower potential for ecological interest and development of these sites could result in net gain in biodiversity. It is recognised that one site has a LWS designation and some sites could have ecological interest due to their natural form, or have TPOs in place on parts of the site which would require adequate mitigation to achieve net gains.
- 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 or making a more positive contribution to its setting.
- The policy was found to have mixed impacts (positive/negative) for flood risk, as 22 sites have some risk of either surface or groundwater flooding, although it is recognised that only 5 of these were found to be of significant risk by the SFRA requiring consideration by the sequential and exceptions test.
- The policy was found to have mixed impacts (positive/negative) for the air quality and noise quality objective; the majority of sites are either within the AQMA or suffer from high levels of road/rail noise, which would require mitigation. However some sites do not have air or noise quality issues, and some, including those within the AQMA are unlikely to worsen air or noise quality due to the amounts of development proposed, having a more 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/adjacent to a heat cluster opportunity area. Almost half are located within a cluster area and therefore have greater potential to reduce greenhouse gas emissions when compared with those that are not and would need to secure carbon savings through alternative means.
- The policy was found to have an overall adverse effect for the waste objective; 2/3 of 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 through adaptive re-use.
- The policy was found to have neutral impacts for the open space objective, reflecting the fact that the majority of sites have no open space designation and therefore will not result in any losses in open space having no impact, with only small losses in designated open space taking place in total. Impacts may become more positive in the longer term if open space provision is secured or improved through development.
- The policy was found to have neutral impacts for the SDNP, as the majority of sites are within the central built up area or situated within an existing urban context, having a 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 CPP2 policy Green Infrastructure and Nature Conservation which seeks to enhance sites and certain ecological features and provides a framework for decision making on designated sites. Development should ensure in net gains in biodiversity/green infrastructure are achieved, 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, CPP2 policies on heritage assets and archaeology would apply.
- In accordance with CPP2 policy Travel Plans and Transport Assessment, major 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, the policy requires larger developments to consider cumulative transport impacts. Development must also meet the requirements of 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 risk of on-site flooding and increasing flooding elsewhere should be addressed through CPP1 CP11 Flood Risk and 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 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 WMLP.
- All development will be required to incorporate features which deter crime in accordance with CPP1 CP12 Public Streets and Spaces.

#### **Recommendations at Proposed Submission Stage**

- No further recommendations

## Policy H1: Built Up Area Housing Allocations

### Housing-sites

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
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
Eastergate Road Garages, Moulsecoomb	++	0	0	0	-/+	++	--	+	--	+	+	--	++	++	+	+	-	++	0	Mixed
Land between Manchester Street/Charles Street, Brighton	++	0	0	--	++	--	++	++	-	+	?	0	++	++	++	+	-	+	++?	Mixed
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
2-16 Coombe Road, Brighton	++	0	0	0	++	--	--	--	+	+	?	+	+	++	++	+	++	++	--	Mixed
Outpatients Department RSCH	++	0	0	--	++	-/+	++	+	+	+	+	--	+	++	+	+	++	++	0	Mixed
Whitehawk Clinic, Whitehawk Road,	++	++	0	0	++	++	++	+	++	++	0	--	++	++	++	++	+	++	0	Pos
Buckley Close garages, Hangleton	0	0	0	-	+	-/+	-	+	++	+	0	--	++	+	+	+	++	+	0	Mixed
Former playground, Swanborough Drive, Whitehawk	+	--	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	+	++	--	++	--	++	+	+	++	++	++	++	+	++	++	--	Pos
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, Portslade	++	0	0	0	++	--	++	-	+	+	+	--	+	++	++	+	+	++	--	Pos
Land south of Lincoln Street Cottages, 15-26 Lincoln Street, Brighton	++	0	0	0	++	++	++	+	-	+	+	--	+	++	++	++	++	++	--	Pos
Hove Sorting Office, 88 Denmark Villas	++	0	0	--	++	++/-	-	-	+	++	+	--	+	++	++	++	++	++	0	Mixed
Former Belgrave Centre, Portslade (SP2)	++	+	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
GBMet College, (Pelham Tower and car-park), Pelham Street, Brighton	++	+	0	-/+	++	--	++	-	++	++	+	-	+	+	++	+	-/+	+	+	Mixed
71 - 76 Church Street, Brighton	++	0	0	--	++	--/+	++	+	+	+	0	+	+	++	++	+	-	++	++	Pos
Post Office site, 62 North Road, Brighton	++	0	0	--	++	-/+	++	-	+	+	0	--	+	++	++	+	-	++	++	Mixed
27-31 Church Street, Brighton	++	0	0	++	++	--/+	++	+	++	++	+	0	+	+	++	+	-	+	++	Pos
Former Dairy Crest Site, 35-39 The Droveaway, Hove	++	0	0	-	+	++	--	-	-	+	0	++	+	+	+	+	++	+	+	Pos
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	-	++	--	++	-	++	+	+	--	+	++	++	+	+	++	++	Pos
Station Road, Portslade (SP7)	++	0	0	0	++	-/+	++	++	++	+	+	--	+	++	++	+	+	++	++	Pos
<b>Overall Summary: predominantly</b>	++	0	0	-/+0	+	--/+	++	-/+	++	+	0/+	-	+	++	++	+	+	++	+	

## Summary of site assessments

- 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 or rejecting any of the sites.
- Some of the positive effects represent opportunities, and will depend on implementation.
- Sites that have been deleted from the allocation list between draft and Proposed Submission stage have been deleted due to evidence on their availability over the plan period, or due to their planning status (e.g. commenced).

## **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 16 sites/clusters allocated, all of which can deliver more than 10 dwellings and which are considered to be deliverable during the plan period.

#### Changes between draft and Proposed Submission stages:

- Clarification that the developable areas of the sites are allocated for housing.
- Cross references to SA4 and SA5 within policy text.
- Clarification that percentages for family housing are indicative.
- New criteria d) requires adverse biodiversity impacts to be mitigated and net gains provided.
- New criteria e) requirements for sustainable transport infrastructure added
- Criteria h) amended to reflect carbon neutral ambition encouraging development to achieve greater CP2 reductions
- New criteria i) requiring self/custom built plots unless unviable
- Explanation of additional criteria relating to phasing of development with sewerage network reinforcement and planning layout to ensure future access to water infrastructure.
- Table updated: some quantum amended; some clusters of sites split into two sites to reflect recent planning consents with consequential amendments to site area and quantum; key site consideration amended to reflect updated evidence.
- Supporting text amended to include further justification on the proportion of family housing to be sought; reference to seeking biodiversity net gains in site allocations; further explanation regarding energy efficiency; reference to design and materials reflecting the Integrated Landscape Character Assessment;

reference to ecological survey requirements relating to designated biodiversity sites; reference to some sites being within GSPZ; reference to the potential for contamination on some sites; protect and enhance PROW

**Assumptions**

- This assessment is based on a combination of the 16 individual site assessments undertaken for each site/site cluster, as well as the policy requirements within H2 and is explained further in the commentary (site assessments can be found at the end of the appraisal).
- 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 and increased resource use, as these wider impacts have been assessed under CPP1 CP1 Housing Delivery.

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>9 of the 16 site allocations contain local nature conservation designations; 8 contain an LWS; 1 contains an LNR. 3 sites without designations are greenfield in nature and therefore could have potential for some ecological interest even if not designated. 4 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>14 of the 16 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 sites, e.g. through various ecological mitigation. The supporting text refers to the sensitivity of some urban fringe sites and refers to the need for applicants to provide an ecological assessment.</p> <p>Additional changes since draft stage strengthen the policy in relation to this objective, should ensure that adverse impacts on designated sites are mitigated and should now result in net gains in biodiversity, through new criterion (d). Overall impacts are considered to be mixed adverse/positive in the short and medium term, reflecting that development on designated sites is likely to result in adverse impacts initially, whereas development on other sites (e.g.</p>	D	T/P

				<p>greenfield/PDL sites) could offer potential for immediate nature conservation enhancement and reflecting the positive ecological requirements of the policy. 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, and result in net gains.</p> <p>Mitigation would also be provided by CPP1 CP10 Biodiversity, as well as draft CPP2 policy Green Infrastructure and Nature Conservation.</p> <p>Policy amended following SA recommendation at draft stage to include a reference to incorporating green infrastructure, which could also positively impact upon biodiversity.</p>		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	-/+	-/+	<p>6 of the site allocations contain publicly accessible areas of designated open space. 2 of the site allocations are privately owned areas of designated open space with or without access. 8 of the sites do not have any open space designations and include brownfield sites or sites in use, such as farms, or those in a countryside location, although these may still provide an open space function.</p> <p>The policy includes a specific criterion which requires all schemes to secure new or improved publicly accessible open space. On privately owned sites, this will result in a net increase in accessible open space however development on publicly 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>11 of the 16 sites allocated include open space as a key on-site consideration within the policy, which should ensure that open space issues are addressed and that accessible open space of some form is provided on site. The supporting text refers to the sensitivity of some urban fringe sites, refers to the need for planning applicants to provide an open space assessment and for proposals to</p>	D	P

				<p>provide public open space where possible.</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 may still be an overall net loss of publically accessible open space.</p> <p>Following SA recommendation at draft stage, 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 criterion which requires all schemes to improve links and access to the SDNP and surrounding area where feasible. In addition, all 16 site allocations include landscape as a key on-site consideration within the policy, which should ensure that landscape 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 a LVIA.</p> <p>Additional changes since draft stage strengthen the policy in relation to this objective, through the reference in the supporting text which requires the materials and design to reflect the beauty and setting of the SNDP and be in accordance with the Landscape Character Assessment.</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</p>	D	T/P

				<p>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 and the setting enhanced.</p> <p>Mitigation would also 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>		
<p>4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites</p>	-/0	-/0	-/0	<p>2 of the site allocations are within or contain a designated heritage asset; 2 of the site allocations is within the setting of a designated heritage asset; 12 of the sites contain an Archaeological Notification Area. 4 sites do not have any heritage/archaeological 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 at draft stage, heritage and/or archaeology was added to some sites as a key on-site consideration within the policy, which should ensure that heritage and archaeology issues are addressed, e.g. through mitigation and 12 sites now include this as a consideration. This is unlikely to result in positive impacts, but should ensure impacts are neutral. 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 risk to any on site or adjacent assets, and neutral effects once heritage/archaeological concerns have been addressed.</p> <p>Mitigation would be provided by CPP1 CP15 Heritage and draft CPP2 policies on heritage and archaeology.</p>	D	P
<p>5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice</p>	-/+	-/+	-/+	<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. However the policy does require sustainable transport infrastructure which could support some journeys</p>	I	P

				<p>made on foot/by bike.</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 mixed.</p> <p>Mitigation would be provided by CPP1 CP9 Sustainable Transport policy and draft CPP2 policies on Transport and Travel.</p>		
6. To improve air and noise quality	-/+	-/+	-/+	<p>None of the sites are situated within or adjacent to the AQMA. 13 sites are considered unlikely to generate a significant amount of traffic individually and are unlikely to affect air quality, however 3 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; 7 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 which should help to address this issue.</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 due to the amount of development which would require assessment and mitigation.</p> <p>Mitigation would be provided by CPP1 CP9 Sustainable Transport policy, and draft 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)	+	+	+	<p>10 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>The policy table includes the GSPZ as a key consideration where relevant, and the supporting text is considered to strengthen the policy in relation to this objective as it specifies that groundwater resources need to be protected and safeguarded. In addition, the policy refers to the need to investigate potential contamination, which can also help to safeguard water supply, and the policy now requires waste water infrastructure and sewerage network reinforcement to be considered, which will also help to protect the wider water environment.</p>	D	P

				Overall impacts are considered to be positive. Additional mitigation also provided by CPP1 SA4 Urban Fringe policy which 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	-/+	-/+	-/+	<p>All of the sites are within floodzone 1 and therefore have no risk of tidal flooding. 7 of the sites have some risk of surface water flooding; 9 have no risk of surface water flooding.</p> <p>13 of the sites have groundwater levels more than 5m below surface, therefore indicating a (low) risk of emergence, although not a high risk. 2 of the sites have groundwater levels between 0.5m and 5m below surface, therefore indicating a higher risk of emergence than the 13 sites, although still not a high risk. 1 site has groundwater levels between 0.025 and 0.5m below surface, therefore indicating a high risk of emergence and this site was recommended for testing under the sequential/exceptions test through the SFRA due to the high risk.</p> <p>Following SA recommendations at draft stage, some of the sites included flood-risk as a key on site consideration within the policy table, which should ensure that issue is considered and addressed. The supporting text also refers to the need to submit a flood risk assessment, due to the sensitivity on some sites. Overall impacts are mixed. 7 of the sites that have no risk of surface water flooding also have a low risk of groundwater flooding and the allocation of these sites represents the positive impacts associated with this objective. The other score reflects the 9 sites which have either a risk of surface water flooding or a higher risk of groundwater emergence which have not been able to be sieved out of the allocation process due to the need to identify and allocate all suitable sites in the city, although it is noted that the SFRA only considered 1 of these urban fringe sites to be at high risk of flooding.</p> <p>Mitigation should also be provided by CPP1 CP8 Sustainable Buildings, CP11 Flood Risk and draft CPP2 policy on SUDs.</p>	D	T
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	The policy already included a specific criterion which required development to consider renewable energy provision which was added following an SA recommended at Proposed Submission stage. This was further amended following Full Council to reflect the council's zero carbon ambition and thus strengthened. This should result in positive impacts on this objective.	D	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, although some forms of development (e.g. flatted form) which may come forward on some sites, may provide opportunities for energy efficient systems, such as communal heating.		
10. To increase the city's resilience and ability to adapt to climate change	-/+	-/+	-/+	<p>12 of the 16 sites consist of land in a natural form, e.g. open/green space which will provide ecosystem services such as temperature regulation and water absorption.</p> <p>From the sites allocated, it's anticipated that approximately 15% of the urban fringe site areas will be developed (c.26ha of 147ha). Although this leaves a significant amount of land in its 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 which will become increasingly important in the future due to predicted 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 incorporate green infrastructure and opportunities for food growing, which contributes towards adapting to climate change.</p> <p>The policy will also result in development on 9 sites which already have a risk of either surface or groundwater flooding, the risk of which will worsen with climate change, although it is recognised and welcomed that 7 of the sites have no/low risk. It is also welcomed that the table includes flood risk as a specific site consideration in need of being addressed which will also contribute towards climate change adaptation.</p> <p>Overall impacts are considered to be mixed. This reflects the fact that there is likely to be an overall net loss of green infrastructure and land which provides natural functions and that some sites have some degree of flood risk; however also reflects the policy considerations and requirements in relation to green infrastructure and flood risk, as well as consideration of the water environment. Mitigation also provided by CPP1 CP8 Sustainable Buildings, CP10 biodiversity and draft CPP2 Green Infrastructure &amp; Nature Conservation, CP11 Flood Risk and DM42 Water and DM43 SUDS.</p>	I	P
11. To improve soil quality	0	0	0	Impacts are considered neutral overall, as most sites are considered to have low	I	P

				<p>potential for contamination, based on current/former uses and most have land classified as an “urban” grade in the agricultural land classification system. It is recognised that 3 of the sites are classified as being within Grade 3 agricultural land, and therefore development on these sites would result in loss of this grade of soil, however it is recognised that the developable area of the these sites are not currently in productive agricultural use.</p> <p>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, and the supporting text refers to the fact that some sites may have potential for contamination based on former uses, as well as refers to the need to provide a land contamination survey which should address this issue.</p>		
12. To minimise and sustainably manage waste	0	0	0	<p>Impacts are considered neutral overall, as most sites do not contain buildings which could be renovated or reused, and therefore do not provide opportunities to reduce waste.</p> <p>Mitigation for the sites that do contain buildings which are unlikely to be retained or re-used would be provided by WMLP policies.</p>		
13. To make the best use of land available	+	+	+	<p>Only 1 site is recommended to be developed in its entirety (site 46a). All of the other sites allocate a portion of the site, with the site allocations covering c.25% of the total site area (26ha of 147ha) of the urban fringe sites allocated within the policy. This should enable some greenfield functions to be retained on site. Density ranges from 12dph to 135dph, although the mean is 33dph. The majority of the sites are therefore likely to result in low density dwellings and are unlikely to achieve CPP1 minimum density targets (50dph), however this reflects the need to consider other site constraints and minimise risk of adverse impacts. Overall impacts are considered to be positive; housing will be provided whilst still enabling the retention of some greenfield functions on most sites.</p>	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	<p>The policy allocates sites to deliver 930 dwellings across the urban fringe sites. This will make a significant contribution towards local housing need and will include affordable housing.</p> <p>The policy also requires family housing (3+ bedroomed) to be delivered with the table including an indicative requirement for all sites, ranging from 35% to 50% provision, although this is predominantly 50%. The range in densities indicates that a range of housing forms will be delivered, and could include low density</p>	D	P

				<p>dwellings, to higher density flatted development, also helping to meet a range of needs. The policy also supports self/custom build and now requirements a proportion of self-build plots. Delivery of housing by the Joint Venture should significantly increase affordable supply. Overall impacts should be significantly positive.</p>		
<p>15. To improve the range, quality and accessibility of services and facilities.</p>	-/+	-/+	-/+	<p>8 of the site allocations are considered to be within walking distance from certain services and facilities, such as a local shop, schools and health services, and should therefore allow future residents to meet access services and meet their day-to-day needs locally, however the remaining 8 sites are not.</p> <p>The policy includes a specific criterion which requires development to consider the need for community facilities, such as shops or health facility, which should result in positive impacts where delivered, although it is noted that this is not referred to as a site consideration as there has been no assessment of need. The policy now also requires sustainable transport provision to be provide which could support access.</p> <p>Overall impacts are considered to be mixed, with adverse impacts reflecting sites with poor access, and positive impacts reflecting those with reasonable access and the positive aspirations of the policy relating to development having regard to community facilities.</p>	I/D	P
<p>16. To improve health and well-being, and reduce inequalities in health</p>	-/+	-/+	-/+	<p>As outlined under objective 15, some of the sites do not have good access to services and facilities, which can also impact upon health.</p> <p>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.</p> <p>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.</p> <p>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 or provision of publicly accessible 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.</p> <p>Overall impacts are therefore mixed.</p>	I	T/P

17. To improve community safety, and reduce crime and fear of crime	+	+	+	Development on all 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. 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.	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 in accordance with CP20, supporting people on lower incomes to access housing. Some of the sites provided by the Joint Venture will be providing more affordable 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 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. Overall impacts are considered to be positive.	I	P
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 are not considered to contribute towards the local economy. 4 of the sites contain 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 B employment floorspace and would not result in a loss of B employment floorspace. Any losses in economic activity are considered to be off-set by the benefits that house-building brings to the local economy.		

### Summary

- The policy was found to have potential for significant positive impacts for housing as should result in 930 dwellings, including a proportion of affordable housing and family sized (3+ bedroomed) dwellings.
- The policy was found to have potential for positive impacts for the objectives for improving water quality through consideration of GSPZs where required, potential to improve soil quality and requirements for waste water infrastructure and sewerage connections; reducing greenhouse gas emissions, through the requirement for development to consider incorporating renewable energy technologies and achieving higher standards of energy efficiency; making the best use of land as will help to deliver housing and retain greenfield functions across non-developed parts of the sites, making good use 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 through improved sustainability standards.

- The policy was found to have potential for mixed impacts for transport/travel; some of the sites have poor access to public transport and other services and their location on the fringes of the city may influence car ownership and travel choice, however the policy does require sustainable transport infrastructure which could support sustainable travel.
- The policy was found to have mixed impacts (positive/adverse) for access and health; 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 loss of open space reducing opportunities for activity, although will result in delivery of housing which is a wider determinant of health.
- The policy was found to have mixed impacts (positive/adverse, leading to neutral/positive in the long term) for biodiversity; 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. In the long term, policy should result in positive/neutral impacts due to the net gain requirements of the policy and the potential for ecological mitigation to become more effective.
- The policy was found to have mixed impacts (positive/adverse) for open space; some sites contain publically accessible open space and would result in an overall net loss; 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 positive impact also reflects the policy requirements to incorporate green infrastructure.
- The policy was found to have mixed impacts (adverse/neutral) for SDNP; 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. Impacts may also become more positive in the longer term reflecting policy requirements to improve access to for design to reflect the character of SDNP.
- The policy was found to have mixed impacts (adverse/neutral) for heritage/archaeology; some sites have heritage/archaeological constraints and could result in adverse impacts, whereas some do not and would have neutral impacts. In addition, consideration of archaeology/heritage within the policy text should also help achieve a neutral impact.
- The policy was found to have mixed impacts (adverse/positive) for air/noise quality. 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 could potentially deliver more than 100 dwellings and could generate the number of trips which may worsen localised air quality. In addition, 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/positive) for flood risk; some of the sites have a risk of either surface water or groundwater flooding, potentially having an adverse effect, whereas some have no risk which contributes more positively towards this objective. Noted that overall, the SFRA only categorised one site as being of a risk that required sequential/exception test. In addition the policy was found the have mixed (adverse/positive) impacts for climate change adaptation; adverse impacts reflecting flood risk and the loss of land from a natural to more urbanised form, reducing ecosystem services functions of this land; positive impacts reflecting policy requirements relating to incorporating green infrastructure and that c.75% of the urban fringe land with allocations will remain undeveloped therefore retaining ecosystem services that will become increasingly important in adapting to climate change.

- The policy was found to have neutral impacts for soil quality; overall the majority of sites are not of high valued soil, and those that are, are not in productive agricultural use. In addition, there is limited opportunity to improve soil quality, e.g. through potential for remediation as most are greenfield in nature. Policy also has neutral impacts for waste, as most sites do not include buildings that could be renovated or reused; and economic development, as will not result in any gains of employment land nor losses in employment land, although it is recognised that some sites currently have existing businesses on site.

#### **Recommendations at Proposed Submission Stage and mitigation**

- Following SA at Proposed Submission stage, the table was amended to reflect any new designations.
- In addition, policy point (g) (energy efficiency) was added as well as supplementary supporting text following the suggestion to include a link to DM44 in the supporting text, with regards to carbon emissions reductions sought on urban fringe sites. This was further amended following Full Council.

#### **Mitigation**

The following CPP1 and emerging CPP2 policies are considered to provide mitigation for the various impacts:

- CPP1 CP10 Biodiversity, as well as draft 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 draft 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 draft CPP2 policy Protection of the Water Environment.
- CPP1 CP8 Sustainable Buildings, CP11 Flood Risk and draft CPP2 policy on SUDs.
- Waste & Minerals Local Plan policies that support management of demolition and construction waste
- Draft CPP2 policy on Community Facilities.



### **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 sites identified as allocations.

#### **Changes to policy between draft and Proposed Submission Plan stages.**

- Clarification that numbers of bedspaces are indicative and not minimums
- Additional site allocated at 45-57 Hollingdean Road, put forward as an omission site during consultation

#### **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.

<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	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 all 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 or sizes of the sites with two being above existing developments. There are no direct impacts on this objective by the policy itself.		
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 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	0	0	0	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; two are fairly close to heritage assets, however of these, one has planning consent, with the development found to be acceptable in heritage terms; the other is located on lower ground and the size of the anticipated development is unlikely to impact upon heritage assets due to the topography and existing buildings between the site and heritage assets.		
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 all sites are located on sustainable transport corridors and 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 all sites are within the AQMA, the sites' locations on a sustainable transport corridor, as well as the fact they are for student accommodation 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 is therefore considered to have positive impacts for air quality. Two of the sites suffer from high levels of road noise, which can effect occupier amenity, and could itself be a generator of noise, however the fact that the sites are unlikely to generate additional road noise results in a positive impact for road noise. The supporting text also requires development to be designed to minimise any negative effects on surrounding residential areas. Overall impacts are considered to be positive.	I	T/P
7. To improve water quality (ecological, chemical and quantity status)	-	-	-	The policy itself has no requirements relating to water consumption or water quality. Two of the sites (Lewes Road) are 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 and Hollingdean Road site as the sites could have potential	I	T/P

				for contamination. Impacts considered to be negative. 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.		
8. To reduce the risk from all sources of flooding to and from development	-	-	-	The policy itself has no requirements relating to flood risk. All sites have some risk of surface water flooding and therefore development in these location could be at risk of flooding. All sites also have groundwater levels between 0.5m and 5m which could mean the sites have a risk of groundwater emergence however are not within the two highest risk categories of groundwater flooding. The SFRA did not consider any of the sites to require further consideration through the sequential/exceptions tests. However, all sites are PDL and of a completely urbanised form. Developments on the sites are unlikely to significantly increase the amount of urbanised environment and is unlikely to increase the risk of flooding.  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.	I	T
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	The policy itself has no requirement relating to reducing greenhouse gas emissions. Two of the sites are 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.	I	P
10. To increase the city's resilience and ability to adapt to climate change	-/+	-/+	-/+	The policy itself has no requirements relating to measures which may support climate change adaptation. All sites have a risk of surface water flooding, which could worsen with climate change, however as all are PDL sites with an urbanised form, it is considered unlikely that development itself will increase the risk of flooding. None of the site currently include any green infrastructure, and could provide an opportunity to include net gains in green infrastructure..  On balance, the policy should have a mixed impacts on climate change	I	P

				adaptation, as will not result in any losses in green infrastructure, could provide the opportunity for net gains through planting which can support climate change adaptation; however are in areas of surface water flood risk. 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. One of the sites has been found to have potential for contamination. 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. 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 site which does not have potential for contamination is unlikely to have any impact on this objective. Overall impacts are mixed positive and neutral towards improving soil quality.	I	P
12. To minimise and sustainably manage waste	--	--	--	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.	I	P
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. In addition, development on the Hollingdean site may make a better site use of this site.	I	P
14. To provide housing, including	++	++	++	The allocations would provide accommodation for an indicative 522 students,	I/D	P

affordable housing, to contribute towards meeting local needs				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.		
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 sites are 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. Two of the sites suffer from high levels of road noise, which could impact upon occupier's health. All 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. All 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 others are within the 10%-20% 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	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 on Lewes Road and workshop is in sui generis uses. In addition, retail uses would need to be retained at ground floor		

opportunities and meet local employment needs.				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 and transport objectives. 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 location of the sites along a sustainable transport corridor should help to minimise the need to travel by car.
- The policy was found to have potential for positive effects for the objectives for air/noise quality, greenhouse gas emissions, best use of land, and access. Any reduction in transport movements should have 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 (negative/positive) on the health and climate change adaptation objective. The delivery of PBSA on all 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. Although development would not result in loss or, and could result in gains in green infrastructure, all sites have risk of flooding which could increase with climate change.
- The policy was found to have potential for mixed (none/positive) impacts on soil quality, due to the potential for contamination and therefore remediation on some sites.
- The policy was found to have potential for adverse impacts on the water quality, flood risk and waste objectives. Two sites are within a Groundwater Source Protection Zone 1 and therefore development poses a risk to water quality. All sites have a risk of surface water flooding/groundwater flooding and development could be at risk or increase the risk of flooding elsewhere.
- No impacts on biodiversity, open space, SDNP, heritage, equalities or economic development are anticipated, either due to lack of the site constraints, location or existing use on site.

### 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 CPP2 policy on SUDS requires development to incorporate SUDS to ensure there is a reduction in surface water leaving the site.
- 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 policy on PBSA refers to the need to minimise adverse impacts on surrounding areas.

### Recommendation at Proposed Submission stage

- There are no further recommendations.

### Policy H3: Student Housing Site Allocations

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
Lewes Road Bus Garage, Lewes Road, Brighton	++	0	0	0	++	--	--	-	+	+	+?	--	+	++	++	++	++	++	0	Mixed
118-132 London Road, Brighton	0	0	0	+	++	--	++	--	++	+	0	--	++	++	++	++	-	++	0	Mixed
45 & 47 Hollingdean Road, Brighton	++	0	0	0	++	--/+	--	-	+	+	+	--	+	++	++	++	-	++	0	Mixed
Overall	0/++	0	0	0/+	++	--/+	--/++	-	+	+	0/+	--	+	++	++	++	-/+	++	0	Mixed

### Employment Allocation Policy

#### 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.

#### Changes between draft and Proposed Submission Plan stages

- No changes to policy wording.
- Additional wording to supporting text to clarify biodiversity requirements re Local Wildlife 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-	Med-	Long-	Summary of Effects	Dir/	Temp/
--------------	--------	------	-------	--------------------	------	-------

	term	term	term		Ind (D/I)	Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-/+	-/+	+	The site is partially greenfield in nature consisting of green open space, could have some biodiversity interest and therefore impacts could be adverse. The policy text does not contain any additional requirements relating to biodiversity, however the supporting text includes a reference to the proximate LWS and the need to conserve and enhance biodiversity which should result in positive impacts. Impacts therefore considered to be mixed. CPP1 CP10 and DM37 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. CP12 Urban Design requires development to have regard to impacts on 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	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	I	P

				<p>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.</p>		
6. To improve air and noise quality	-/+?	-/+?	-/+?	<p>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.</p>	I	T/P
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>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.</p>		
8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>The site comprises open spaces which will have a natural role in absorbing water. The site is in floodzone 1 and has no risk of surface water flooding. The site has groundwater at levels between 0.5m and 5m which poses some risk of groundwater emergence, however is not within the two highest risk categories of groundwater flooding. It is noted that the SFRA considered the overall flood risk to be low and did not require it to be considered further by the sequential/exception tests. 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</p>		

				implementing this.		
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 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. 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.	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 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	+	+	+	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 help facilitate access to employment and could help reduce employment deprivation. Impacts could be positive depending on take up by deprived communities.	I	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 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 open space, SDNP, travel, flood risk and climate change adaptation. 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 biodiversity and air/noise quality objectives. The site comprises open space or a greenfield nature, and is adjacent to and includes part of two LWS, which could be adversely affected by development, although noted that the supporting text acknowledges this. 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 at Proposed Submission Stage**

- There are no recommended changes.

## **Appendix H Maps**

South Downs National Park

Conservation Areas

Special Area of Conservation

Site of Special Scientific Interest

Local Nature Reserves

Local Wildlife Sites

Daytime noise levels

Groundwater Source Protection Zones

Flood Risk Areas, zones 2 and 3

Groundwater depth

Surface Water Flood Risk; conveyance zone and accumulation zone

Surface Water Flood Risk with climate change; depth

Surface Water Flood Risk with climate change; velocity

Surface Water Flood Risk with climate change; combined risk

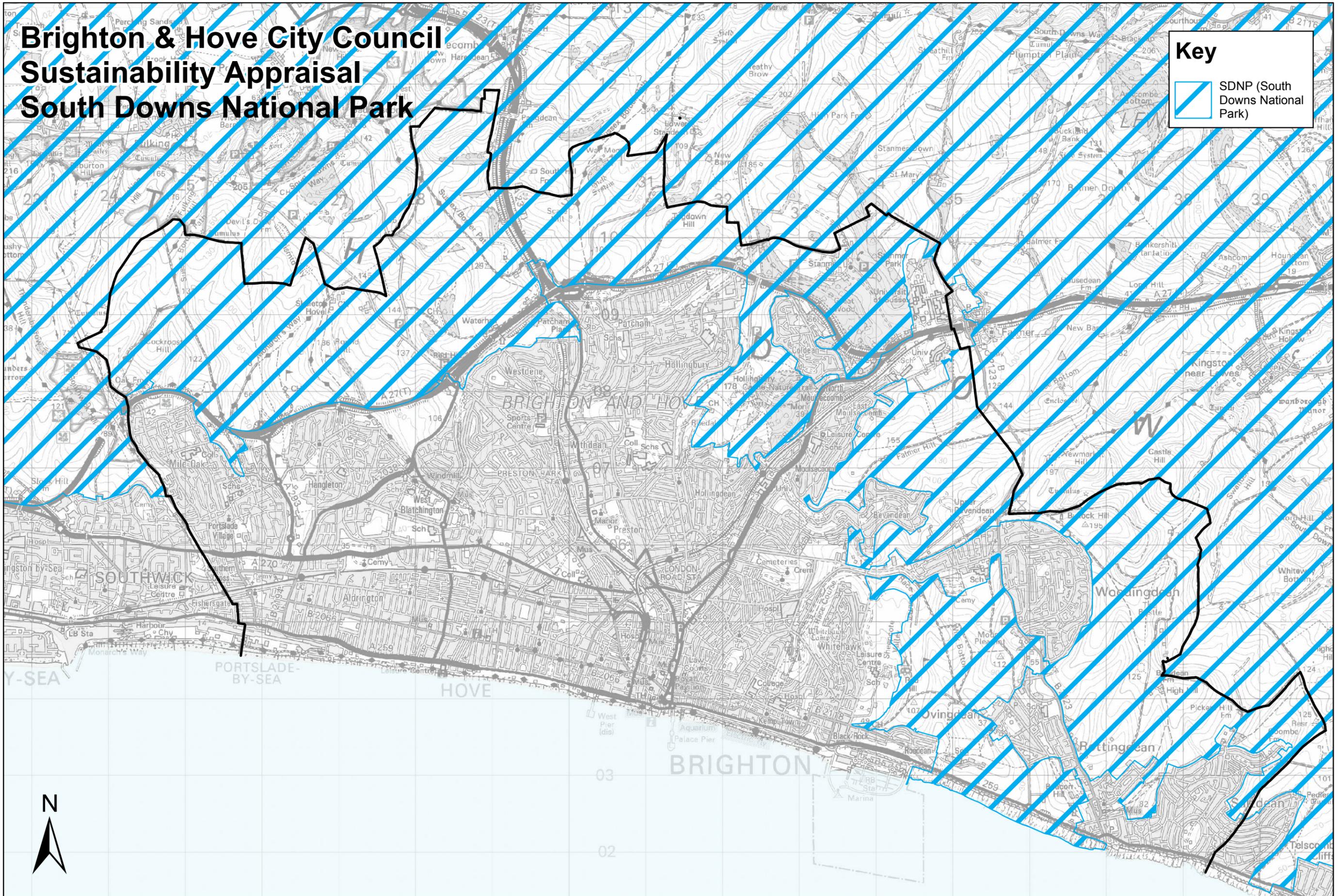


Brighton & Hove  
City Council

# Brighton & Hove City Council Sustainability Appraisal South Downs National Park

**Key**

 SDNP (South Downs National Park)



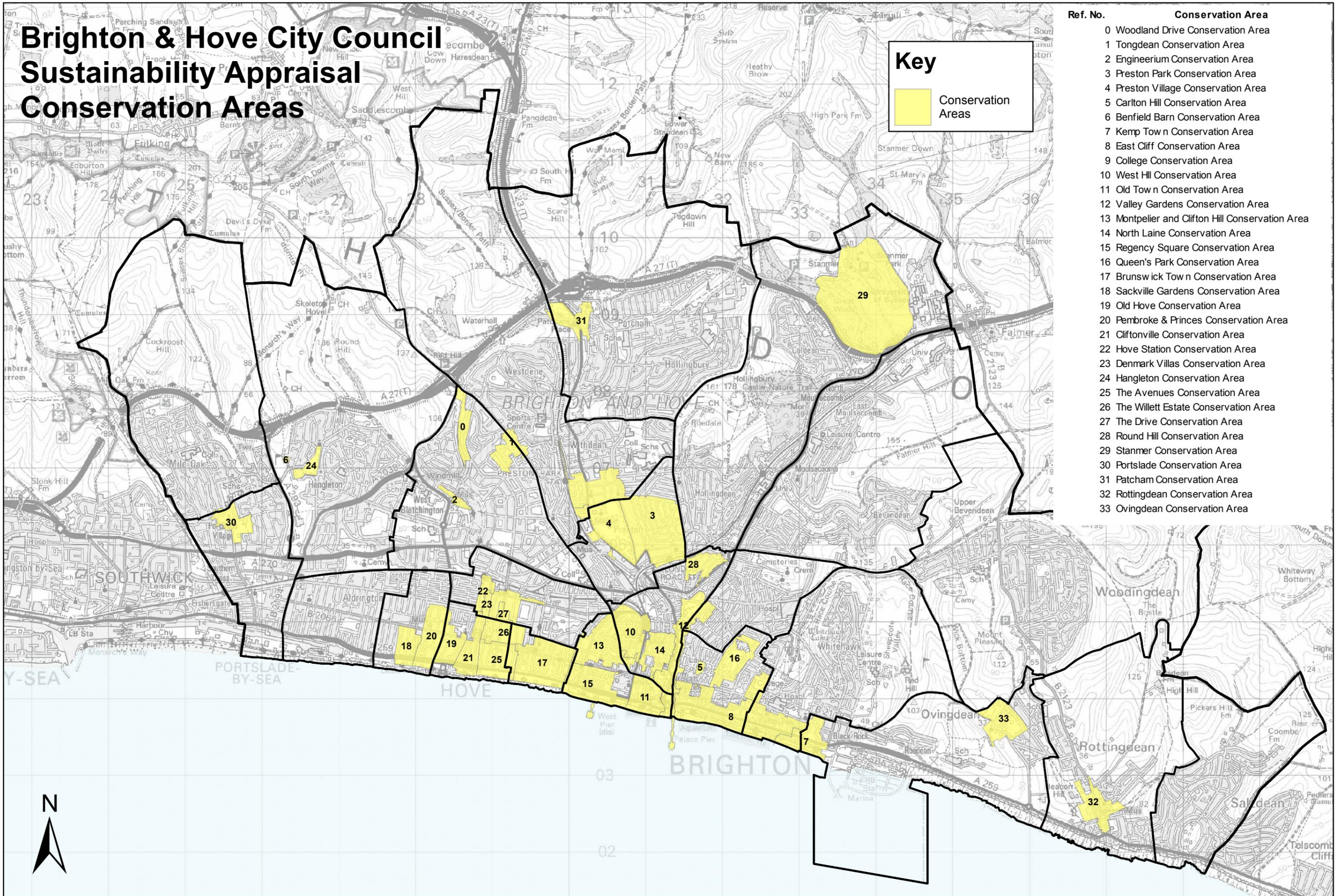
# Brighton & Hove City Council Sustainability Appraisal Conservation Areas

**Key**



Conservation Areas

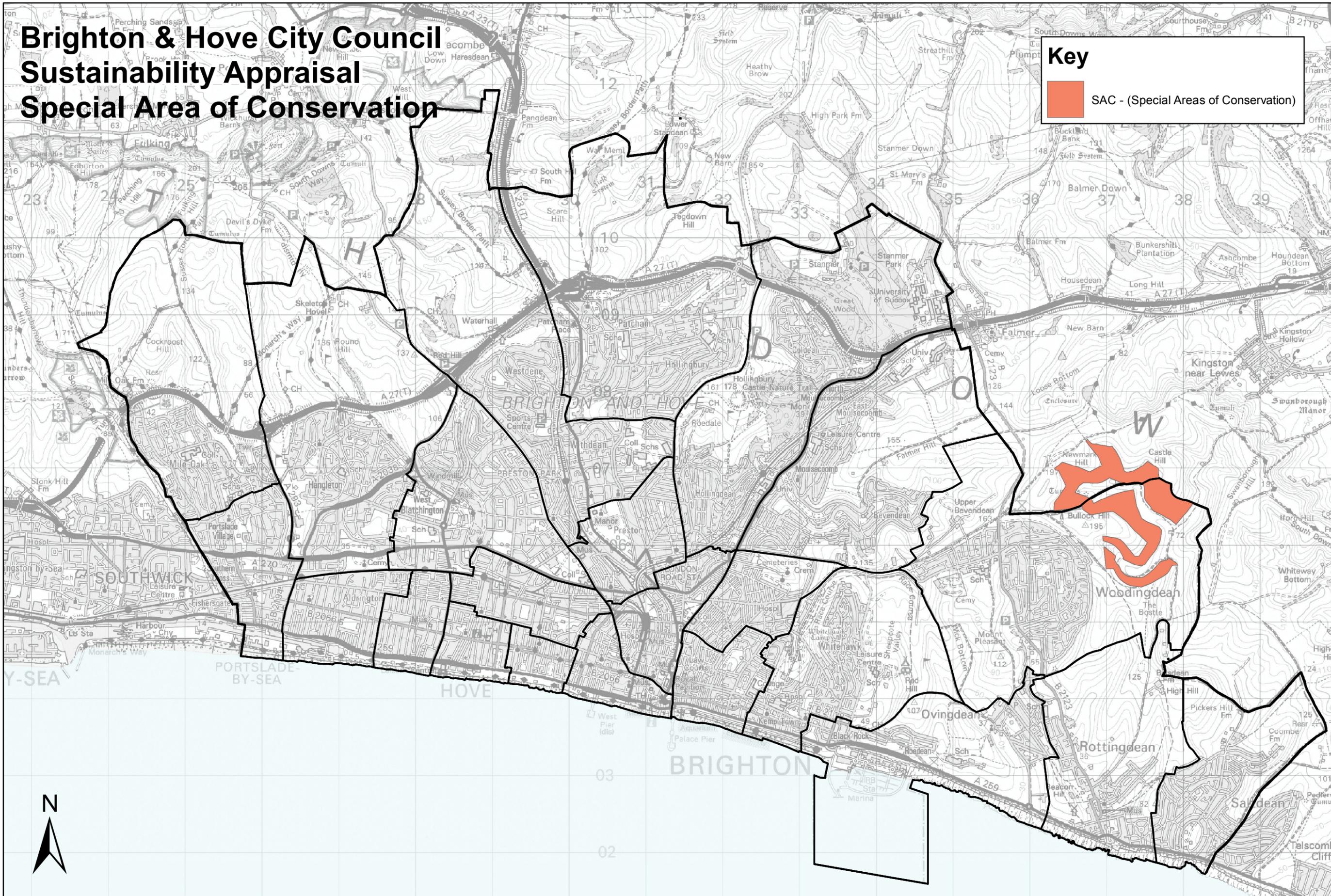
Ref. No.	Conservation Area
0	Woodland Drive Conservation Area
1	Tongdean Conservation Area
2	Engineerium Conservation Area
3	Preston Park Conservation Area
4	Preston Village Conservation Area
5	Carlton Hill Conservation Area
6	Benfield Barn Conservation Area
7	Kemp Town Conservation Area
8	East Cliff Conservation Area
9	College Conservation Area
10	West Hill Conservation Area
11	Old Town Conservation Area
12	Valley Gardens Conservation Area
13	Montpelier and Clifton Hill Conservation Area
14	North Laine Conservation Area
15	Regency Square Conservation Area
16	Queen's Park Conservation Area
17	Brunswick Town Conservation Area
18	Sackville Gardens Conservation Area
19	Old Hove Conservation Area
20	Pembroke & Princes Conservation Area
21	Cliftonville Conservation Area
22	Hove Station Conservation Area
23	Denmark Villas Conservation Area
24	Hangleton Conservation Area
25	The Avenues Conservation Area
26	The Willett Estate Conservation Area
27	The Drive Conservation Area
28	Round Hill Conservation Area
29	Stanmer Conservation Area
30	Portslade Conservation Area
31	Patcham Conservation Area
32	Rottingdean Conservation Area
33	Ovingdean Conservation Area



# Brighton & Hove City Council Sustainability Appraisal Special Area of Conservation

**Key**

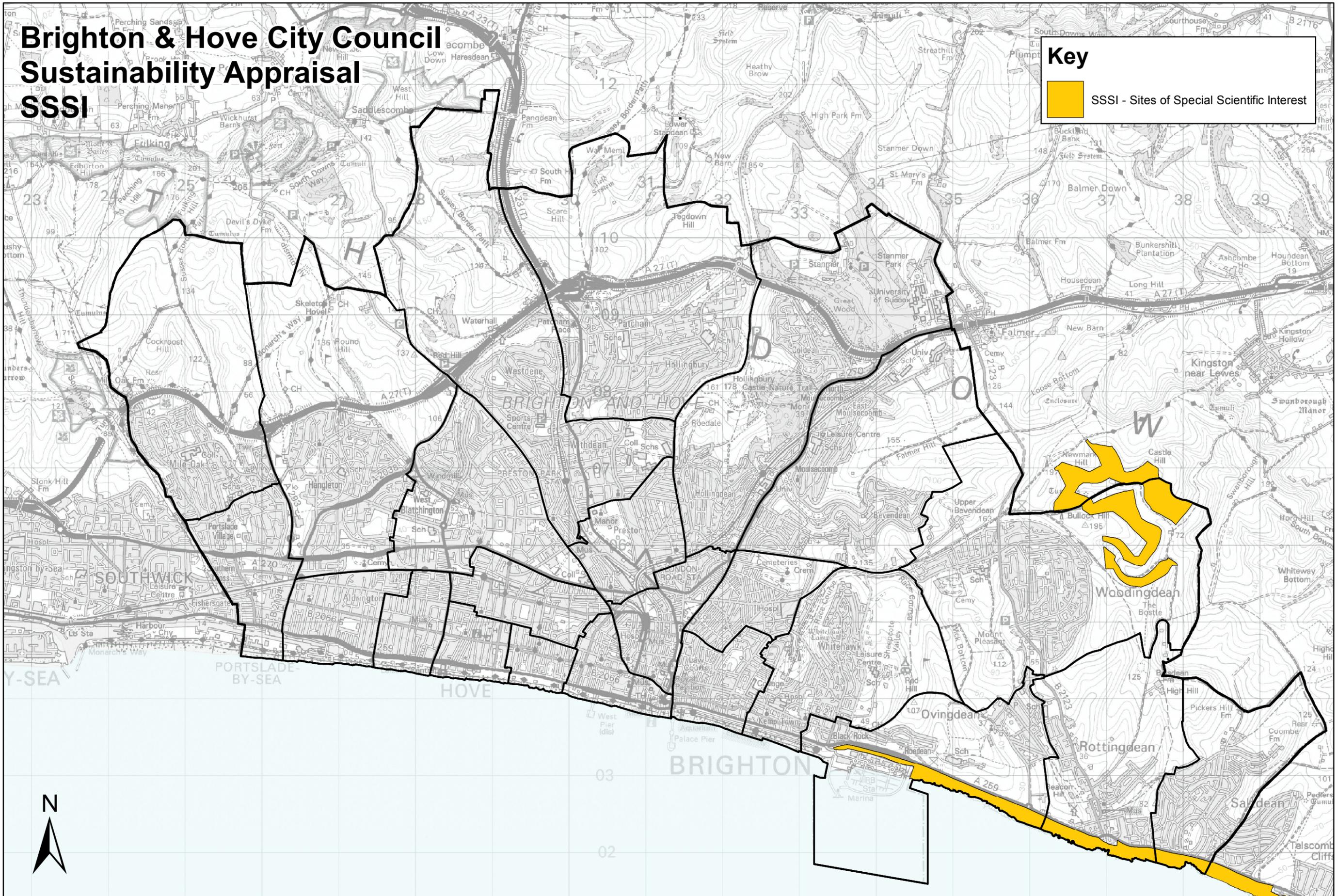
 SAC - (Special Areas of Conservation)



# Brighton & Hove City Council Sustainability Appraisal SSSI

**Key**

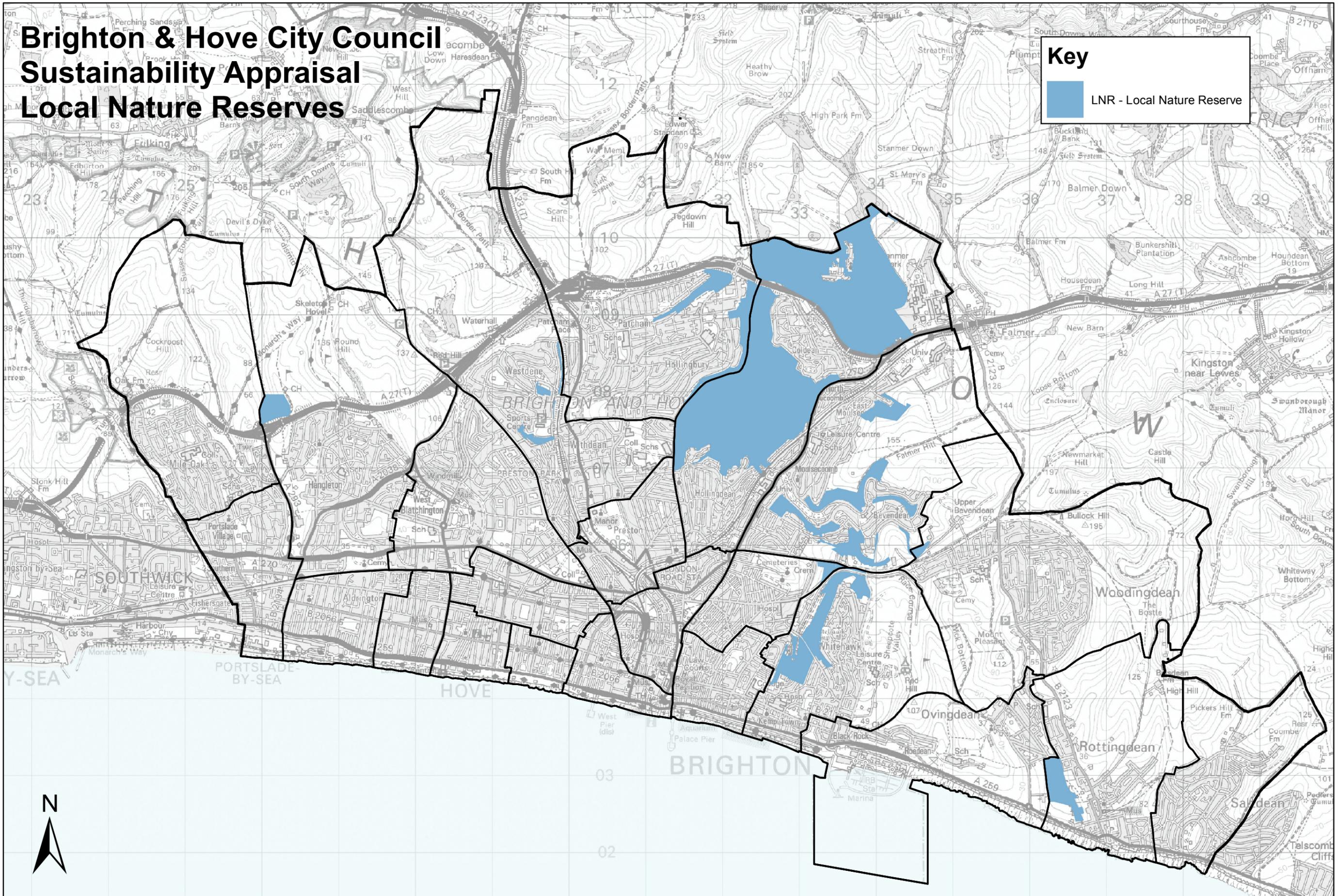
 SSSI - Sites of Special Scientific Interest



# Brighton & Hove City Council Sustainability Appraisal Local Nature Reserves

**Key**

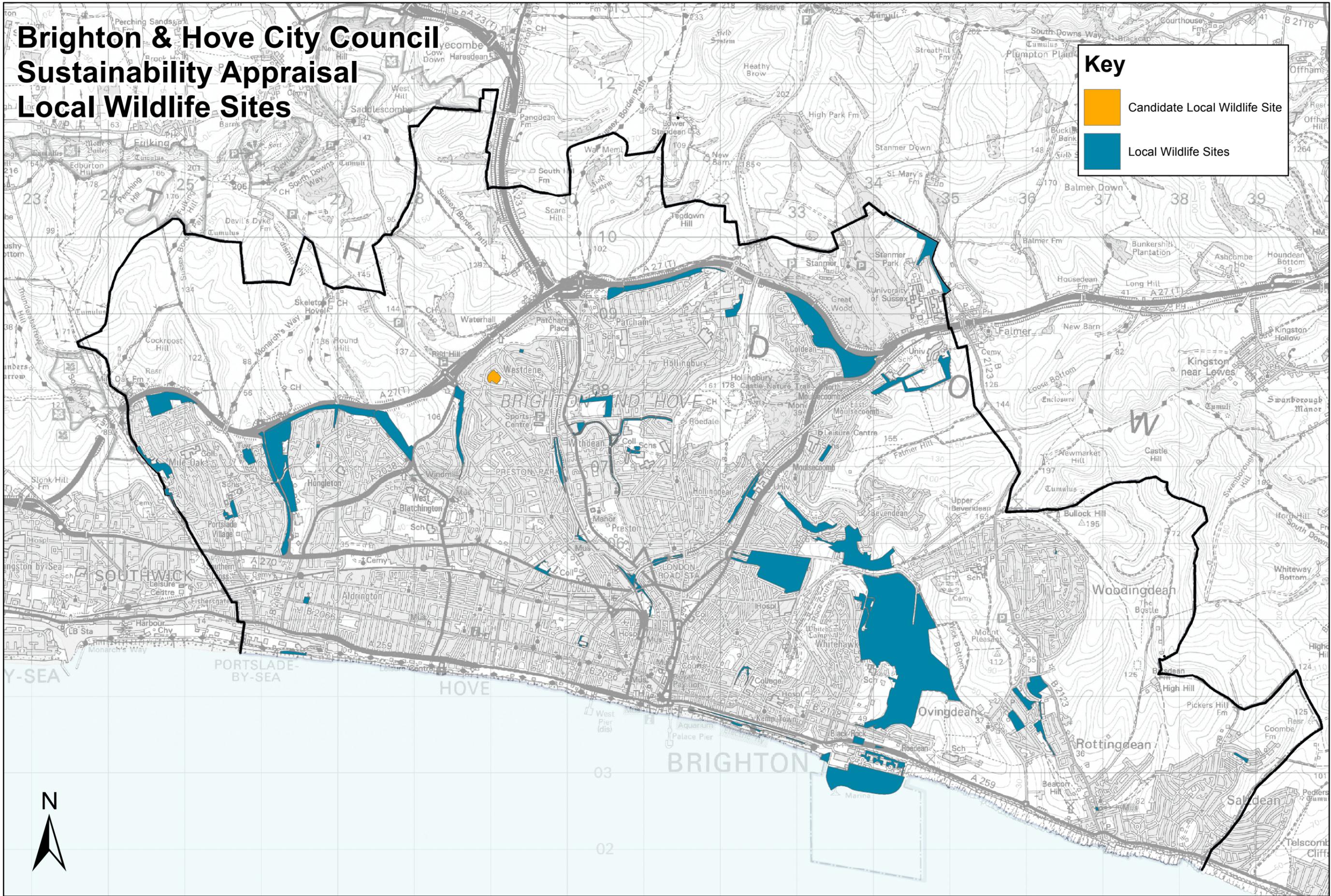
 LNR - Local Nature Reserve



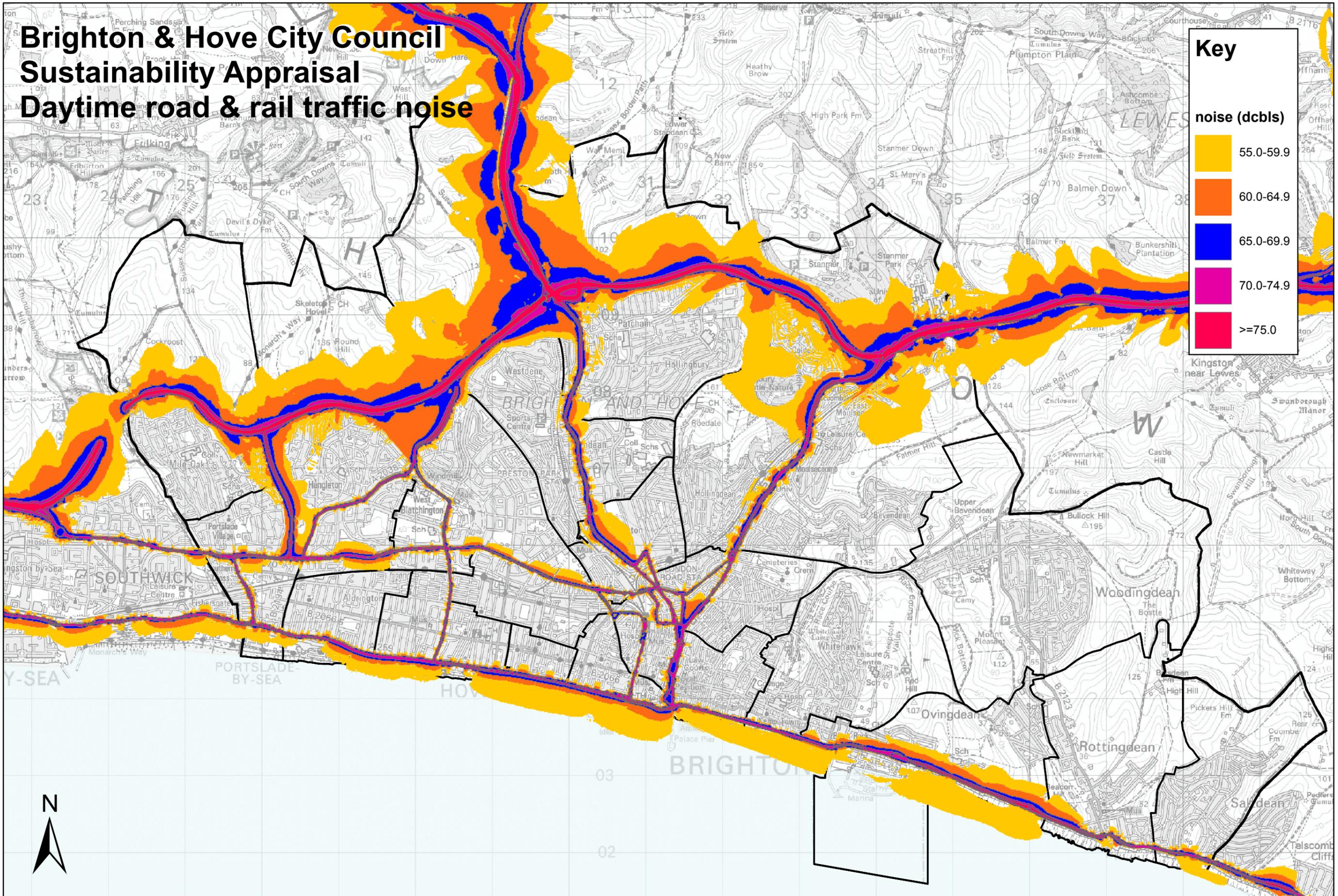
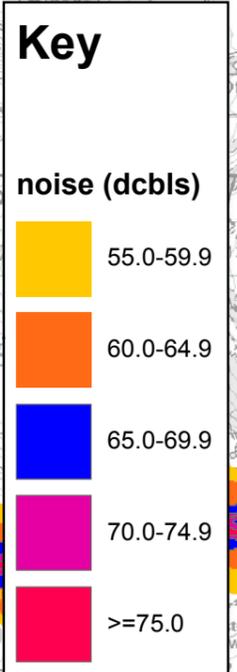
# Brighton & Hove City Council Sustainability Appraisal Local Wildlife Sites

**Key**

-  Candidate Local Wildlife Site
-  Local Wildlife Sites



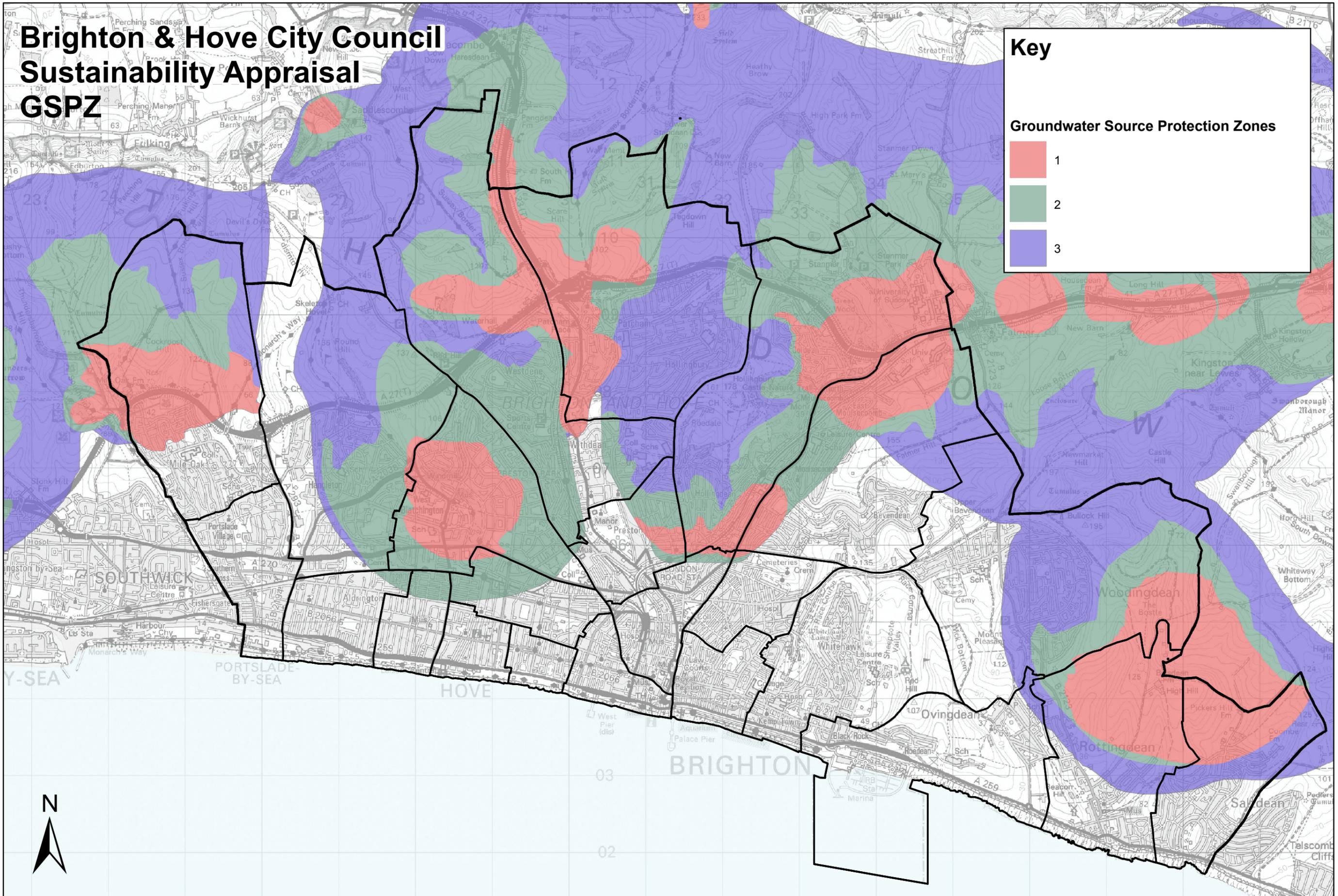
# Brighton & Hove City Council Sustainability Appraisal Daytime road & rail traffic noise



# Brighton & Hove City Council Sustainability Appraisal GSPZ

## Key

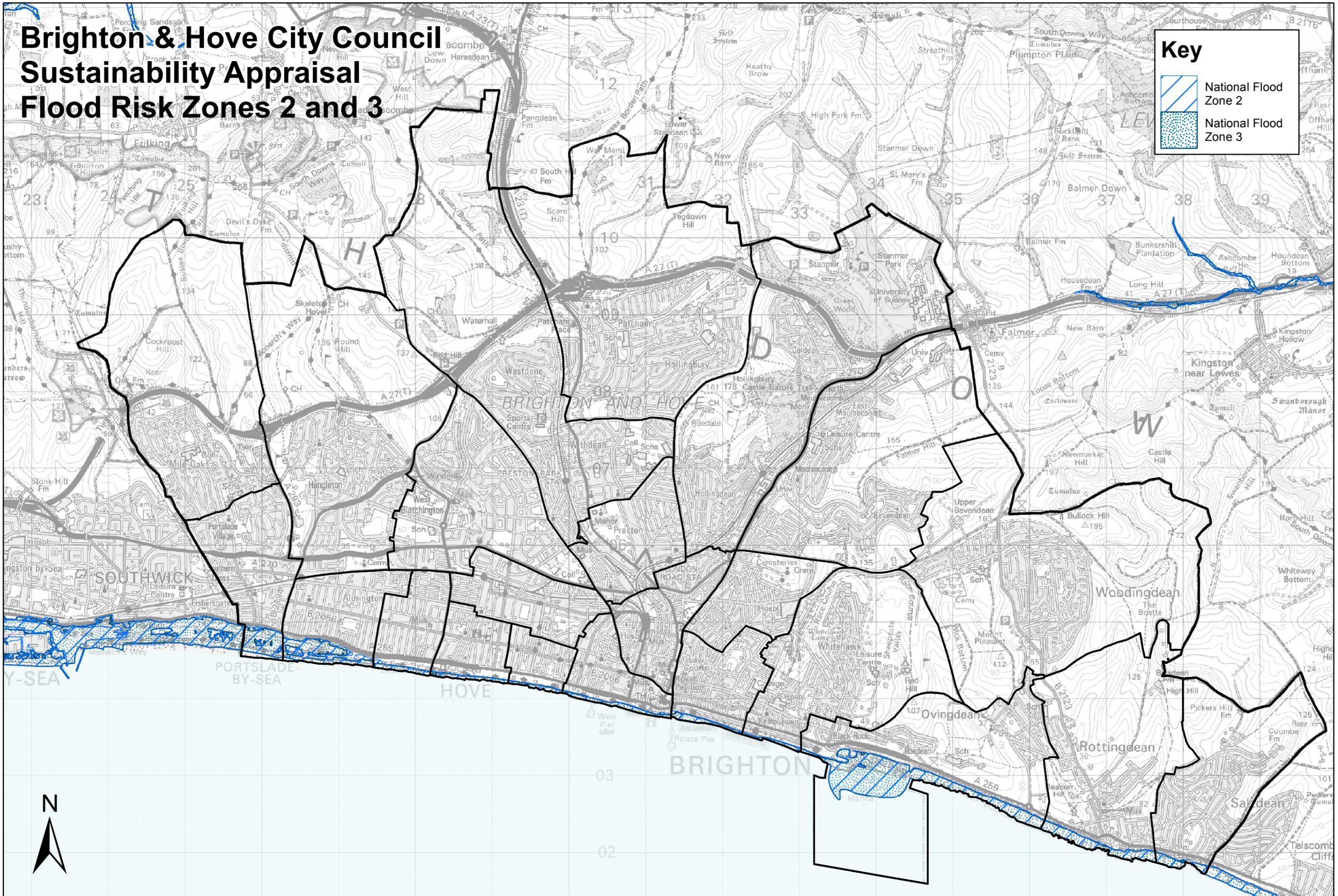
### Groundwater Source Protection Zones



# Brighton & Hove City Council Sustainability Appraisal Flood Risk Zones 2 and 3

**Key**

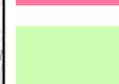
-  National Flood Zone 2
-  National Flood Zone 3

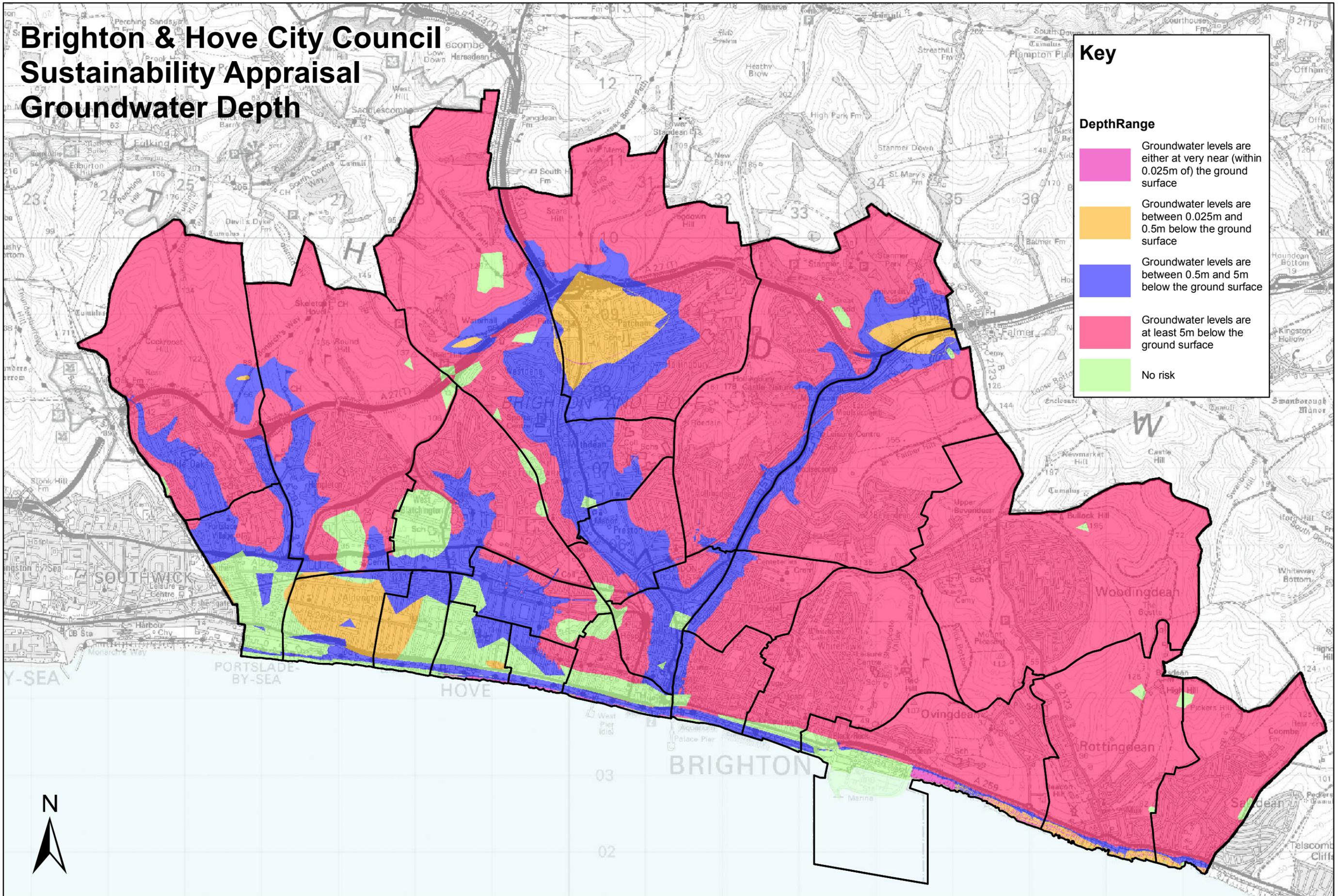


# Brighton & Hove City Council Sustainability Appraisal Groundwater Depth

## Key

### DepthRange

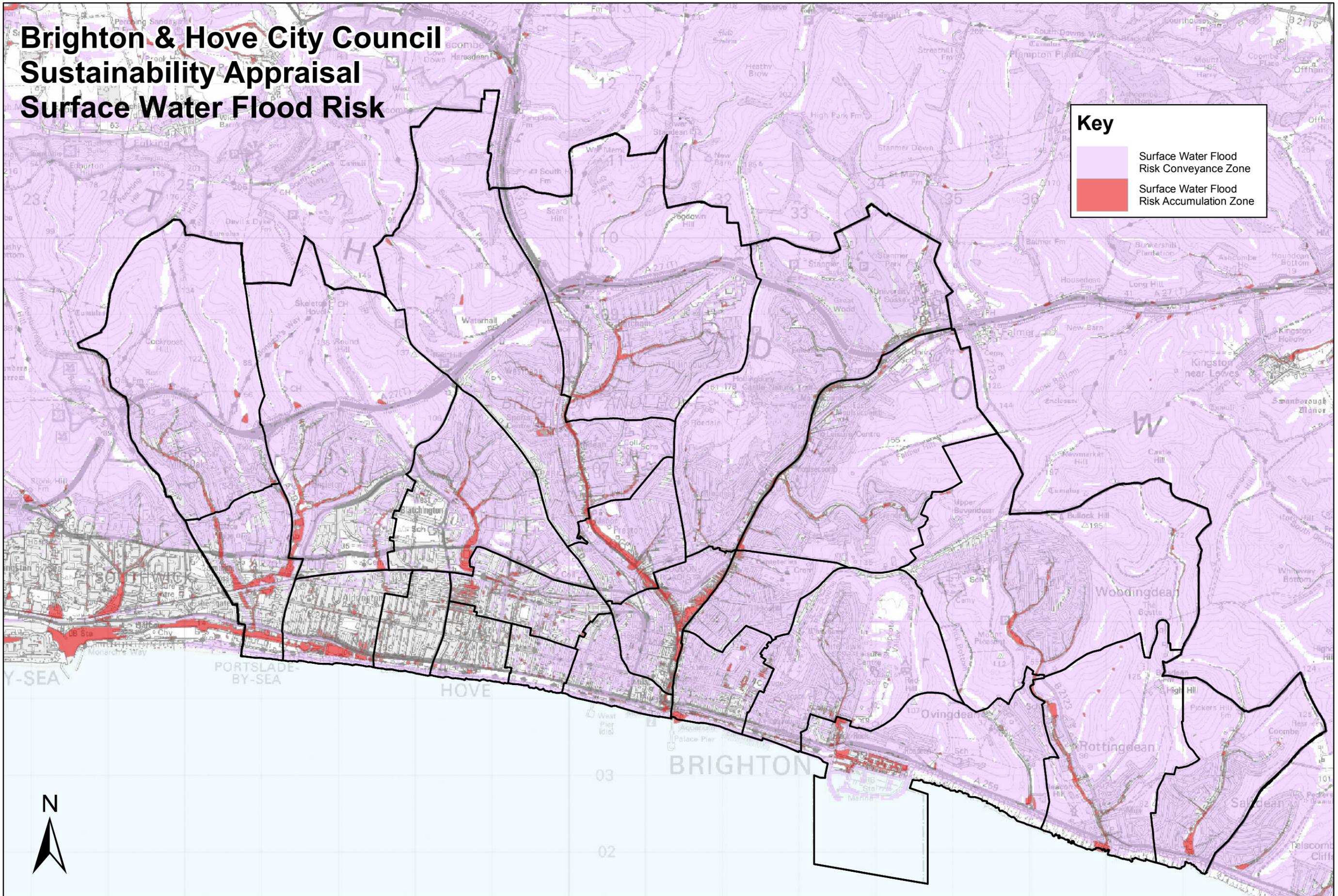
-  Groundwater levels are either at very near (within 0.025m of) the ground surface
-  Groundwater levels are between 0.025m and 0.5m below the ground surface
-  Groundwater levels are between 0.5m and 5m below the ground surface
-  Groundwater levels are at least 5m below the ground surface
-  No risk



# Brighton & Hove City Council Sustainability Appraisal Surface Water Flood Risk

**Key**

- Surface Water Flood Risk Conveyance Zone
- Surface Water Flood Risk Accumulation Zone



# Brighton & Hove City Council Sustainability Appraisal Surface Water Flood Risk with climate change

**Key**

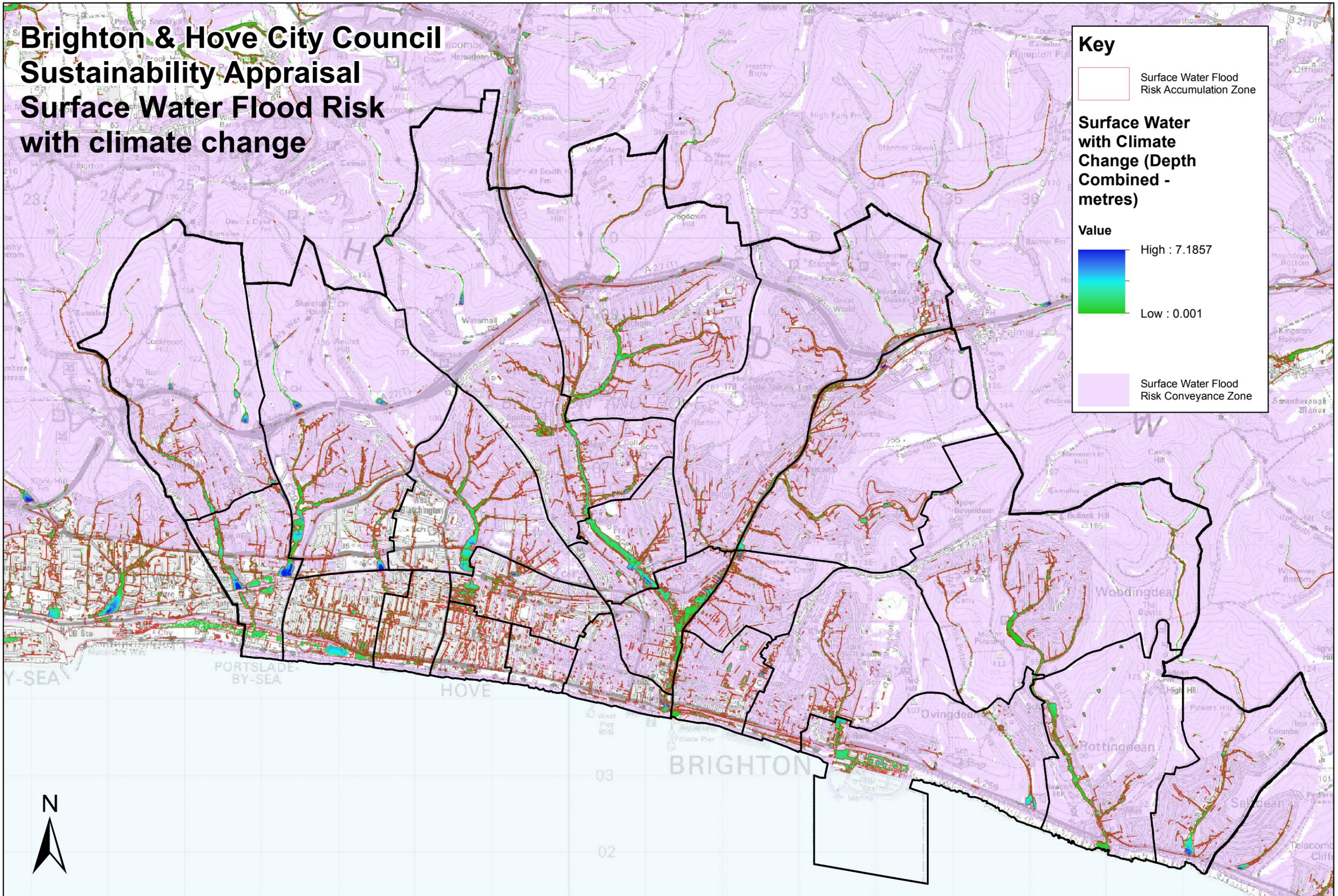
- Surface Water Flood Risk Accumulation Zone

**Surface Water with Climate Change (Depth Combined - metres)**

**Value**

- High : 7.1857
- Low : 0.001

Surface Water Flood Risk Conveyance Zone



# Brighton & Hove City Council Sustainability Appraisal Surface Water Flood Risk with climate change

**Key**

- Surface Water Flood Risk Accumulation Zone
- Surface Water Flood Risk Conveyance Zone

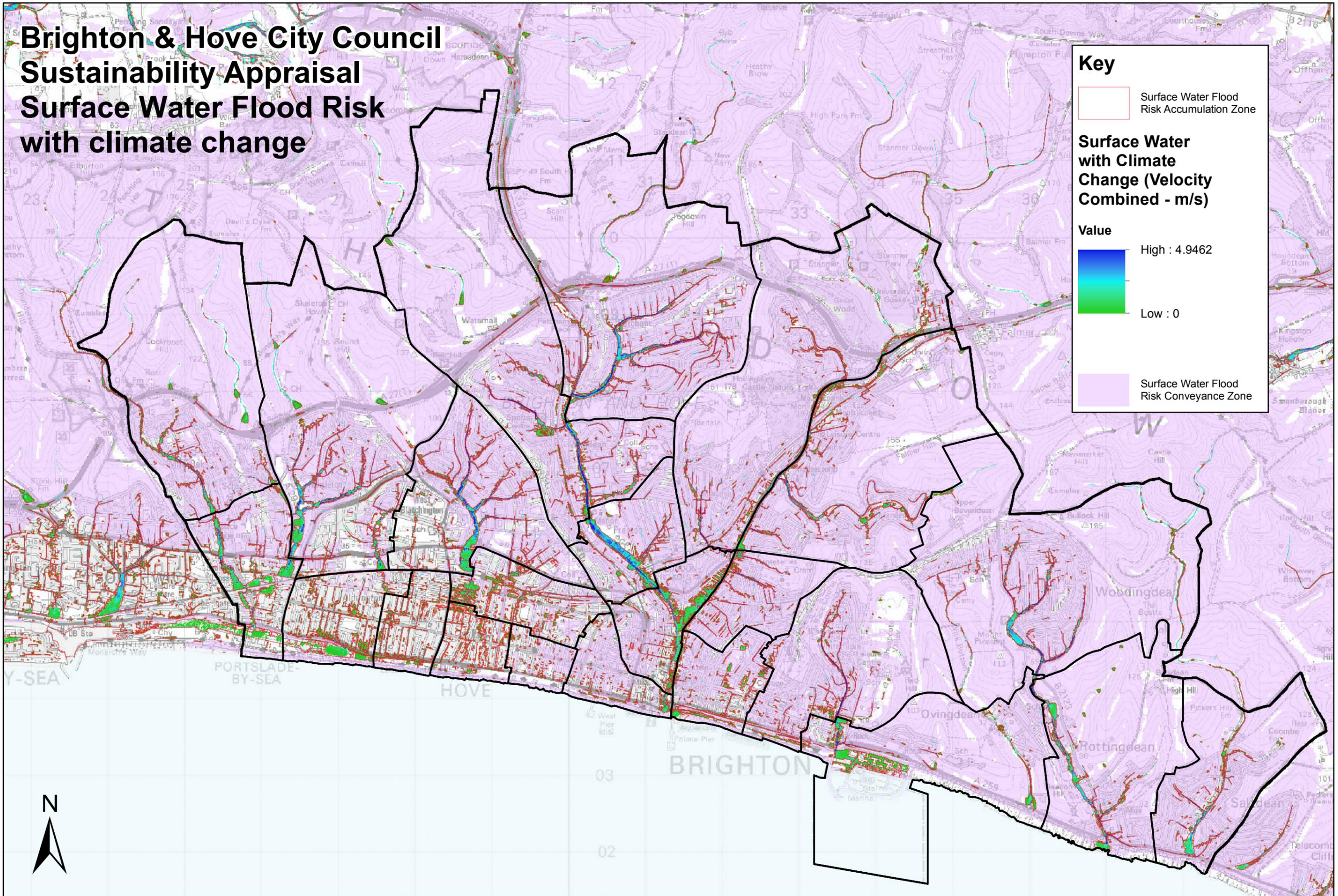
**Surface Water with Climate Change (Velocity Combined - m/s)**

**Value**

High : 4.9462

Low : 0

Surface Water Flood Risk Conveyance Zone



# Brighton & Hove City Council Sustainability Appraisal Surface Water Flood Risk with Climate Change

**Key**

- Surface Water Flood Risk Accumulation Zone
- Surface Water Flood Risk Conveyance Zone

**Surface Water with Climate Change (Hazard Combined)**

**Value**

High : 6.7676

Low : 0.5005

