

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

# **Proposed Submission City Plan Part Two**

## **Health & Equalities Impact Assessment Addendum**

April 2020



Brighton & Hove  
City Council

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## Section 1: Background

- 1.1 Brighton & Hove City Council began the preparation of City Plan Part 2 in 2016. In July 2018, the draft City Plan Part 2 was published and was subject to widespread community and stakeholder consultation.
- 1.2 As part of the preparation of CPP2, a combined Health & Equalities Impact Assessment (HEQIA)<sup>1</sup> was carried out on the policies contained in the draft CPP2 to fulfil the council's requirements relating to Health Impact Assessment and Equalities Impact Assessment. The assessment helped to identify potential health outcomes, both adverse and beneficial and their distribution amongst groups with protected characteristics.
- 1.3 The HEQIA was an iterative process and made a number of recommendations on how to improve the policies to ensure beneficial impacts were maximised and to reduce or avoid adverse impacts. These recommendations were incorporated into revised policies at draft stage where relevant.
- 1.4 As a result of stakeholder consultation at draft stage and updated or new evidence, a number of policies have been amended between draft City Plan and Proposed Submission City Plan stages. In addition, further amendments were approved at Full Council, 23.04.20. These changes have been assessed against the findings of the HEQIA 2018 to determine whether the changes had any potential for impacts on the determinants of health and communities with protected characteristics and therefore change the previous findings of the HEQIA 2018.

## Section 2: Purpose of this report and screening exercise

- 2.1 The purpose of this Addendum report is to consider whether there are any health and equalities implications arising from the changes to policies that have arisen since the draft CPP2 was published for consultation in summer 2018. This was undertaken by considering all of the changes against the HEQIA appraisal framework as set out in Figure 1 and considering whether the policy amendments would alter the results of the previous HEQIA findings.

Figure 1: HEQIA Appraisal Framework

Health pathway/determinant	Construction Stage	Operation Stage	Impacts on all communities inc. those with protected characteristics
Demography			
Income & Employment			
Education			
Housing			
Transport			
Crime and Safety			
Access and Accessibility			
Services, Amenities & Leisure			
Lifestyle			
Health Needs			
Environment			
Food Access			
Community Cohesion			

<sup>1</sup> <https://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/FINAL%20HEQIA%20June%202018.pdf>

- 2.2 When undertaking this exercise, the following were considered to be potential outcomes:
- No impact on any of the determinants of health or communities with protected characteristics; e.g. amendment is editorial or for clarification purposes.
  - Minor positive or negative effect on one or more of the determinants of health or communities with protected characteristics, however does not change the overall findings of the HEQIA 2018.
  - Major positive or negative effect on one or more of the determinants of health or communities with protected characteristics, likely to change the findings of the HEQIA 2018.
- 2.3 Appendix A contains the appraisals where the changes to policy were found to result in a change to the previous HEQIA findings.
- 2.4 The HEQIA 2018 should be referred to for all remaining appraisals that have not changed since the HEQIA was undertaken at draft stage.

### Section 3: Summary of assessment of Proposed Submission City Plan Part 2 Development Management policies

- 3.1 This section summarises the consideration of changes to all Development Management policies following consultation on the draft City Plan Part 2 and following Full Council amendments. The changes to DM12, DM13, DM14, DM16, DM24, DM35 and DM40 were found to result in a change to the previous HEQIA assessment. The remaining HEQIA assessments are unchanged.

Policy	Key changes to policy	HEQIA implications
DM1	Table 2 (space standards) 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	No change to HEQIA. Strengthens positive findings particularly against housing and demography pathways.
DM2	Minor changes to supporting text including reference to family housing need.	No change to HEQIA. Strengthens positive findings against demography and housing pathways.
DM3	Change to original floor area cited in DM3a) from 124 sqm to 120sq metres. Consequent amendments to supporting text	No change to HEQIA. Strengthens positive findings particularly against housing and demography pathway.
DM4	Minor amendments to policy text for clarity. Amendments to supporting text to reflect conclusions of Older People's Housing Needs Assessment including the need to plan for a wide mix of accommodation options and the amounts of different types of accommodation that will be required. Clarification that accommodation falls within both C2 and C3.	No change to HEQIA. Strengthens positive findings particularly against housing and demography pathway. Particularly inclusive for older people.
DM5	Whilst still resisting loss the policy now includes criteria that set out the circumstances under which loss of residential accommodation for people with special needs will be allowed. Clarification in supporting text of application of policy.	No change to HEQIA. Policy still found to be positive for the housing pathway and still particularly inclusive for homeless people, disabled people and individual and families with specialist needs.

<b>Policy</b>	<b>Key changes to policy</b>	<b>HEQIA implications</b>
DM6	<p>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.</p> <p>Amendment to affordable housing criteria, 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>Updates to supporting text to cross reference to other policies.</p>	<p>No change to HEQIA. Assessment against the housing health pathway still found to be positive despite reduction in the proportion of affordable housing to be delivered, particularly as the policy requires rents to be genuinely affordable.</p>
DM7	<p>No change to policy.</p> <p>Clarification in supporting text on the size of communal living space.</p>	<p>Although there were limited changes to this policy, the policy was reassessed to take into consideration comments received at draft stage, particular regarding the potential effects of the policy on access to lower cost housing for lower income groups. However, the re-appraisal concludes that the policy still allows HMOs to come forward in areas of the city where there are low concentrations, therefore will not restrict HMO delivery overall, having positive impacts for the housing pathway. Policy considered to be inclusive, including for communities most likely to access this type of housing such as students, young professionals and people on lower incomes.</p>
DM8	<p>Additional criterion clarification of communal space requirements for cluster flats and studio flats</p> <p>Replacing requirement for 'on-site' security presence with effective and 'appropriate' provision.</p> <p>Removal of requirement for tenancy agreements to last full academic year.</p> <p>Consequential amendments to supporting text.</p>	<p>No change to HEQIA. Policy still found to have positive impacts on the crime &amp; security health pathway, and communal space requirements strengthen impacts on lifestyle pathway.</p>
DM9	<p>Removal of 'improved' from policy as improvements (e.g. extensions/ enlargements or refurbishments would not be required to address a-c).</p> <p>Clarification of circumstances under which partial loss would be allowed.</p>	<p>No change to HEQIA or impacts on any of the health or equalities health pathways.</p>
DM10	<p>No change to policy.</p> <p>Removal of requirements for verification of asking price with the local planning authority within supporting text; cross-reference to DM40 regarding agent of change</p>	<p>No change to HEQIA. Strengthens income and services pathways.</p>

<b>Policy</b>	<b>Key changes to policy</b>	<b>HEQIA implications</b>
	principle.	
DM11	Clarification of application of part of policy to B2 and B8 premises. Simplification of policy wording to aid clarity. Consequential changes to supporting text and updates to include reference to designing out waste and zero-exhaust emissions infrastructure.	No change to HEQIA. Strengthens impact on income and employment, environment and lifestyle health pathways.
DM12	Widening the range of uses changes from A1 retail unit can go 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 other than in Lanes and North Laines. Marketing requirement reduced to 6 months in primary, secondary and local shopping centres. Clarification that residential uses would be permitted above retail unit or to the rear of units in shopping centres. Consequential amendments to supporting text.	Major change to HEQIA. The policy is now considered to have a positive impact for the housing pathway to reflect potential for delivery of housing. Changes strengthen the impact on income and employment health pathways.
DM13	Clarification that residential uses would be permitted above retail units or to the rear of units in important local parades; additional Local Parade added.	Major change to HEQIA resulting from residential uses being permitted. The policy is now considered to have a positive impact for the housing pathway to reflect potential for delivery of housing.
DM14	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. Simplification of policy wording to aid clarity.	Major change to HEQIA. The policy is now considered to have a positive impact for the housing pathway to reflect potential for delivery of housing. Changes strengthen the impact on income and employment health pathways.
DM15	Changed name of policy. No change to policy text.	No change to or impacts on HEQIA.
DM16	Inclusion in policy to reference to impact of cycle routes and provision of cycle parking being needed to be considered with any proposals for new or improved markets and market stalls.	Major change to HEQIA. The policy is now considered to have a positive impact for the transport health pathway, reflecting potential for active travel.
DM17	Removal of word 'suitable' for clarity. Clarification of wording d) that re-provision within a development is permitted if accords with City Plan policies or strategic allocation.	No change to or impacts upon HEQIA.
DM18	Reference to considering the circular economy principles added. 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	No change to or impacts upon HEQIA.

<b>Policy</b>	<b>Key changes to policy</b>	<b>HEQIA implications</b>
	materials should be low-maintenance, and that funded maintenance plans may be required.	
DM19	Clarification of role of policy to avoid underdevelopment of sites through minor changes to policy wording and supporting text.	No change to or impacts upon HEQIA.
DM20	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.	No change to or impacts upon HEQIA.
DM21	Inclusion of consideration of 'scale' in criterion a). Some amendments to supporting text to clarify the design elements that will be considered. SPD referred to.	No change to or impacts upon HEQIA.
DM22	Changes to first part of policy 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. Changes to supporting text to clarify guidance on replacement of felled trees.	No change to HEQIA. Changes strengthen impact on environment health pathway.
DM23	Changes to policy to clarify treatment of 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. Cross reference to DM40 regarding avoiding light pollution Removal of unnecessary wording in supporting text.	No change to or impacts upon HEQIA.
DM24	Additional policy criteria added to ensure 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.	Major change to HEQIA. Positive now considered to have an impact for crime & safety pathway to reflect links to supporting public safety. Changes strengthen findings for the environment health pathway.
DM25	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	No change to HEQIA. Changes strengthen findings for the environment and health pathway.

<b>Policy</b>	<b>Key changes to policy</b>	<b>HEQIA implications</b>
	consulting with those who have a visual interest in the development.	
DM26	No changes to policy text. Amendments to supporting text to aid clarity and simplification of text. Reference in supporting text supporting contemporary and innovative design approaches. Reference in supporting text regarding conservation of traditional features on rear elevations.	No change to or impacts upon HEQIA.
DM27	No changes to policy text. Amendments to supporting text to aid clarity and simplification of text. Reference in supporting text supporting contemporary and innovative design approaches.	No change to or impacts upon HEQIA.
DM28	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.	No change to or impacts upon HEQIA.
DM29	No changes to policy. Amendments to supporting text to support where appropriate bold architectural approaches and that other considerations may be applicable.	No change to or impacts upon HEQIA.
DM30	Amendment to policy to include expectation that applicant should demonstrate that alternative, non-registered sites have been considered and assessed. Consequential changes to supporting text.	No change to or impacts upon HEQIA.
DM31	No changes.	No change to or impacts upon HEQIA.
DM32	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.	No change to HEQIA. Changes strengthen findings for the environment health pathway.
DM33	Clarification on certain policy provision 1b); 2b) and 3b) apply 'where appropriate' (improving wider public realm, cycle network, public transport network). Clarification that cycle parking provision should be universally accessible. Clarification in supporting text with regards to non-standard cycle parking provision. Within provision for cyclists, additional wording regarding extending existing networks	No change to HEQIA. Changes strengthen findings for the health pathway.
DM34	Minor wording changes to aid clarity of policy and inclusion of footnote referencing relevant government guidance. Supporting text confirming that impacts on designated	No change to or impacts upon HEQIA

Policy	Key changes to policy	HEQIA implications
	sites and landscapes will be evaluated.	
DM35	<p>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.</p> <p>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)</p>	<p>No change to HEQIA. Changes strengthen findings for the environment health pathway. This also impacts positively on people susceptible to poor air quality including younger, older and people with certain medical conditions.</p>
DM36	<p>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. Addition to part 2 to clarify infrastructure includes electric vehicle charging points.</p>	<p>No change to HEQIA. Changes strengthen findings for the environment health pathway.</p>
DM37	<p>New sub-headings for “Green Infrastructure” and “Nature Conservation” to add clarity;</p> <p>New requirement for green infrastructure to be integral to design and layout, and to achieve a variety of sustainability benefits.</p> <p>Section on nature conservation now requires development to conserve and enhance, rather than protect and prevent damage to features. Now also required: net gains in biodiversity, protection of priority species/habitats; habitat management secured; and control of invasive species. Deletion of text “where possible”. Reference to nature recovery networks.</p> <p>Marine and coastal biodiversity, and geodiversity added to the list of nature conservation 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.</p> <p>Clarity over criteria which do not apply to allocated local sites.</p> <p>All proposals must still ensure integrity of designations maintained, enhancement through management plans; and mitigation to result in net gains.</p> <p>Deletion of requirement for greater reductions in CO2 emissions and improvements to public appreciation of the site.</p>	<p>No change to HEQIA. Changes strengthen the findings for the environment lifestyle.</p>

Policy	Key changes to policy	HEQIA implications
	Consequential changes to supporting text to reflect policy changes, reference to swift bricks/boxes, bee bricks, and further reference to the mitigation hierarchy, clarification of the provision of on-site mitigation where possible, and confirmation of update of Nature Conservation SPD. Reference to nature recovery networks.	
DM38	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. Supporting text amended to reflect the greater protection afforded to the designation and to clarify that development should be compatible with the designation; reference to the NPPF regarding the consistency with LGS designations and wider planning policy; additional text relating to provision of outdoor sports facilities at Benfield Valley. Scope for further sites to be designated through preparation of neighbourhood plans clarified in supporting text.	No change to HEQIA. Changes strengthen the findings for the access and environment health pathways.
DM39	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.	No change to HEQIA. Changes strengthen the findings for the environment health and access/accessibility pathways; also strengthens positive impacts for people who may have difficulty accessing the beach, including elderly and disabled people, and people with young children.
DM40	Inclusion in criterion e) preventing biomass and CHP in or near AQMAs or sensitive receptors such as RSCH; inclusion in criterion f) to consideration of impact of lighting on biodiversity in particular priority habitat and species; clarity regarding agent of change principle; reference to indoor air quality in supporting text and updated guidance; 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.	Changes strengthen findings for the environment health pathway. This also impacts positively on people susceptible to poor air quality including younger, older and people with certain medical conditions.
DM41	Clarification in policy that seeking to protect natural capital and the quality of the environment. Include definition of natural capital in footnote.	No change to or impacts upon HEQIA.
DM42	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. Reference to emerging Greater Brighton	No change to HEQIA. Changes strengthen the findings for the environment health pathway.

<b>Policy</b>	<b>Key changes to policy</b>	<b>HEQIA implications</b>
	Water Plan.	
DM43	Amendment to policy to clarify that subterranean development if not permitted where other sources of flooding have occurred. Amendment to policy to clarify that SUDs should be located and designed in accordance with best practice and adopted Sustainable Drainage SPD and that proposals should provide where possible improved biodiversity. Changes to supporting text to clarify certain types of SUDs more appropriate than others given aquifer. Updated reference to SFRA and SPD and other available good practice guidance.	No change to HEQIA. Changes strengthen the findings for the crime and safety and environment health pathways.
DM44	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.	No change to or impacts upon HEQIA.
DM45	No change to policy wording. Reference to social value and council social value framework.	No change to or impact upon HEQIA.
DM46	Amend policy to require that proposals 'must' meet CHP Quality Assurance standards and demonstrate suitability to a future connection Supporting text amended to include reference to low-carbon heat networks for clarification	No change to or impacts upon HEQIA.

## **Section 4: Summary of assessment of Special Area and Strategic Site Allocations policies**

- 4.1 This section summarises the consideration of changes to all SA and SSA policies following consultation on the draft City Plan Part 2 and following Full Council amendments. The changes to SA7 were found to result in a change to the previous HEQIA assessment. The remaining HEQIA assessments are unchanged.

<b>Policy</b>	<b>Key changes to policy</b>	<b>HEQIA implications</b>
SA7	Policy amended to include reference to enhancing wildlife connectivity and buffer zones. Paragraph added to supporting text to reflect ANA designation and potential for archaeology. Policy	Major change to HEQIA. Change to housing pathway in relation to potential impacts on people with protected characteristics.

Policy	Key changes to policy	HEQIA implications
	amended to show encouragement for including housing for older people. Additional supporting text requires protection and enhancement of existing public rights of way .	
SSA1	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 Additional criteria f) and g) to address waste water infrastructure requirements Additional criteria h) to address site specific biodiversity and green infrastructure requirements (including swift colony). Consequential changes to supporting text including relating to contaminate land.	No change to HEQIA. Changes strengthen the findings for the environment health pathway.
SSA2	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.	No change to HEQIA. Changes strengthen the findings for the environment health pathway.
SSA3	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 to potential for contaminated land and further guidance on design principles and nearby heritage assets.	No change to HEQIA. Changes strengthen the findings for the environment health pathway.
SSA4	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 potential for contaminated land.	No change to HEQIA. Changes strengthen the findings for the environment health pathway.
SSA5	Inclusion in policy of reference to refurbishment, restoration and revitalisation of terraces; clarification on small/ boutique hotels; cycling infrastructure; event and shared spaces and greater detail on biodiversity/ landscaping improvements sought. Consequential amendments to supporting text. Additional text clarifying funding available from the council for restoration.	No change to HEQIA. Changes strengthen the findings for the transport and environment health pathways.
SSA6	Clarification through policy amendments to main and ancillary uses permitted. Additional criterion c) relating to density of development Further detail on biodiversity improvements sought.	No change to HEQIA. Changes strengthen the findings for the environment health pathway.

Policy	Key changes to policy	HEQIA implications
	Consequential supporting text improvements. Supporting text added to clarify temporary consent granted for outdoor swimming pool on site	
SSA7	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 create 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.	No change to HEQIA. Changes strengthen the findings for the environment health pathway.

## Section 5: Summary of assessment of Site Allocations policies

4.2 This section summarises the consideration of changes to all Site allocations policies including those arising from amendments at Full Council. The changes to H1 and H2 were found to result in a change to the previous HEQIA assessment. None of the other amendments to policies were found to result in a change to the HEQIA 2018 findings.

Policy	Key changes to policy	HEQIA implications
H1	Requirement for development on some sites to align with sewerage network reinforcement and/or 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 Tables 5 and 6 amended for some sites: quantum updated for some sites to reflect recent planning consents or other evidence; 2 sites deleted to reflect availability within plan period; 6 sites removed which had commenced; 2 new sites added (omission sites).	Major change to HEQIA. Policy now considered to have an impact positive impacts for the environment pathway to reflect links to protection of water and potential for contamination. Policy found to still have positive impacts for the housing pathway as should still lead to delivery of over 1,500 homes.
H2	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	Major change to HEQIA regarding transport. Other changes considered to strengthen the findings for the environment health pathway.

	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	
H3	Clarification of indicative numbers of bedspaces in policy wording and table. Additional PBSA site allocated.	No change to HEQIA. Changes considered to strengthen the findings for the housing health pathway.
E1	No changes to policy wording. Additional wording to supporting text to clarify biodiversity requirements re Local Wildlife Sites	No change to or impacts upon HEQIA.

## Section 6: Conclusion

### Summary of effects of changes

6.1 Overall, most of the changes made to policies following draft CPP2 stage are considered to either strengthen the policies or had a negligible impact on the findings of the HEQIA undertaken at draft stage. Some of the changes resulted in a major positive impact on one or more of the health pathways and resulted in a change to the previous HEQIA; this was applicable for seven policies (DM12, DM13, DM14, DM16, DM24, DM40 and H2). In addition, some of the changes had positive effects for people with certain protected characteristics; this was applicable for three policies (DM35, DM40 and SA7).

### Summary of overall effects

#### Housing, Accommodation and Community

- 6.2 The range of housing, accommodation and community development management policies, is inherently geared to not only address forecasted population growth in the city, but to also account for increasing life expectancy, an ageing demographic and residents with limited mobility or specialist needs.
- 6.3 Development management policies relating to the provision of new housing are geared to support healthy lifestyle choices, through provision of cycling infrastructure and promoting alternatives to car use. Policies also support the protection of important community facilities such as public houses to help preserve community identity and support community cohesion.
- 6.4 Potentially negative impacts are associated with facilitating natural population growth, and relate to increased demand for local education, healthcare and transport services. However, these are addressed through overlapping policy and further addressed through appropriate planning contributions (CIL and S106).

- 6.5 Overall the policies are considered to be inclusive, and could have particularly beneficial effects for older people or those with specialist needs.

### **Employment and Retail**

- 6.6 The development management policies relating to employment and retail place importance on the retention of retail areas and markets as important community assets and generation of new business, employment, services and amenities for the public. As a result, health and wellbeing is supported through improving opportunities for social interaction and socio-economic circumstance. In addition, the employment and retail development policies support increasing demand on local healthcare services from population growth as D1 community uses (such as doctors and dentists) are to be permitted in retail centres.
- 6.7 Overall, the impacts from the construction and operation of all employment and retail development management policies are either neutral or positive, and are inherently inclusive and do not discriminate against any particularly sensitive protected characteristic.

### **Design and Heritage**

- 6.8 The design and heritage development management policies contribute to the provision and retention of high quality urban environments which incorporate healthy urban design features and principles, supporting healthier more cohesive and vibrant communities. Examples include: improving social interaction and community cohesion; contributing to the development of safe neighbourhoods; improving provision of active transport infrastructure; and protecting valuable open space, recreational and leisure facilities to encourage a more active lifestyle and enhance wellbeing.
- 6.9 Overall, the impacts from the construction and operation of all design and heritage development management policies are either neutral or positive, and are again inherently inclusive and do not discriminate against any particularly sensitive protected characteristic.

### **Transport and Travel**

- 6.10 The transport and travel development management policies ensure that there is an adequate response to the increasing transport demand within Brighton & Hove. BHCC supports infrastructure that would facilitate park and ride and encourages a switch to low emission vehicles which help to improve air quality within the city.
- 6.11 A primary focus of the policies is to improve road safety and encourage sustainable and active transport links, creating a modal shift away from private vehicles. This in turn helps to improve physical activity with social, mental and physical health benefits for all demographics; helps to improve healthy independent living for longer, and delays the onset of poor health and the need for care.
- 6.12 Overall, the impacts from the construction and operation of all transport and travel development management policies are either neutral or positive, and are inclusive in the way that they aim to ensure convenient access for pedestrians, cyclists and public transport users regardless of their level of personal mobility and do not discriminate against any particularly sensitive protected characteristic.

## **Environment and Energy**

- 6.13 The environment and energy development management policies aim to protect Brighton & Hove's high-quality environment and as a result protect health and wellbeing through making good use of brownfield sites for development, protecting and enhancing green space and reducing pollution and nuisance. Such policies help mitigate against precursors to adverse health conditions (air quality, noise, land contamination), and also encourages social interaction and active lifestyles.
- 6.14 Overall, the impacts from the construction and operation of all environment and energy policies are either neutral or positive, and are inclusive in the way that they do not discriminate against any particularly sensitive protected characteristic. In addition, the policies could be beneficial for people who are otherwise vulnerable to poor air quality, such as younger, older and people with certain medical conditions.

## **Site Allocation Policies**

### **Site Allocations**

- 6.15 Overall, the impacts from the construction and operation of the site allocation policy is either neutral or positive, and are inclusive in the way that they do not discriminate against any particularly sensitive protected characteristic.

### **Strategic Site Allocations**

- 6.16 The Strategic Site Allocations, Housing Sites and Other Site Allocations are largely neutral or positive where residual impacts relate to where there may be a potential impact on amenities or employment during the construction phase.
- 6.17 In each case, the allocations are inherently inclusive and do not discriminate against any particularly sensitive or protected community characteristic.

## **Conclusion**

- 6.18 CPP2 represents a comprehensive and inclusive suite of policies geared to fostering a healthy, vibrant, cohesive and sustainable population.

## Appendix A: HEQIA assessments changed since draft stage

All other assessments remain the same as at draft stage.

Health Determinant	Health Pathway	Potential Health Outcome		Protected Characteristics	Recommendation/ Comments
DM12: Changes of use within Regional, Town, District and Local Shopping Centres	<p><i>Local Centres in Brunswick Town and Hove are added to the Brighton &amp; Hove retail hierarchy in addition to those set out in policy CP4 of Brighton &amp; Hove CPP1. The primary and secondary frontages of the Regional, Town and District shopping centres and the frontages of the Local Centres and Important Retail Parades are designated as shown on the Policies Map.</i></p> <p><i>To allow for diversification in shopping centres, change of use of an existing class A1 unit to non-A1 uses within the designated shopping centres and as shown on the Policies Map, will be permitted subject to various criteria (see full policy).</i></p>				
Demography	This policy will not influence population number, composition or structure.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy seeks to retain and enhance Brighton & Hove's retail economy and associated direct, indirect and induced employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy does allow change of use to residential and may have positive impacts on housing provision.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not directly	0	0	Inclusive.	No additional recommendations.

	influence transport, where it seeks to retain community assets and retail areas, and seeks to support the viability of small frontages that might remove the need for transport to larger retail areas.			No particularly sensitive protected characteristic.	
Crime and Safety	This policy will not influence crime.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to maintain and sustain access and accessibility to a range of community facilities and resources.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.
Services, Amenities and Leisure	This policy seeks to maintain and sustain access and accessibility to a range of community facilities and resources.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.
Lifestyle	This policy will not materially influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	The policy allows for other uses to be permitted in retail centres, which could include D uses and may influence additional health needs of the community.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	This policy will not materially	0	0	Inclusive.	No additional recommendations.

	impact upon the urban environment.			No particularly sensitive protected characteristic.	
Food Access	The policy seeks to retain and maintain the sustainability and viability of retail areas.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.
Community Cohesion	The policy seeks to retain and maintain valuable community assets important to health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

DM13: Important Local Parades, Neighbourhood Parades and Individual Shop Units	<i>10 shopping areas designated as ILPs. In Important Local Parades, changes of use involving the loss of A1 retail units, will be permitted where the proposal would not result in the number of units in A1 retail use falling below 50%; shop has been marketed for a year. Changes of use at ground floor to residential permitted to the rear or on upper floors; temporary uses considered.</i> <i>In Neighbourhood Parades planning permission will be granted for change of use outside designated centres and ILPs where there are alternative shopping facilities within 300m; the unit has been marketed for a minimum of a year.</i>				
Demography	This policy will not influence population number, composition or structure and is more geared to retaining and enhancing valuable community assets.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy seeks to retain and enhance Brighton & Hove's retail economy and associated direct, indirect and induced employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy does allow change of use to residential and may have positive impacts on housing provision.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not directly influence transport, where it seeks to retain community assets and retail areas, and seeks to support the viability of small frontages that might remove the need for transport to larger retail areas.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to maintain and sustain access and accessibility to a range of community facilities and resources.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.
Services, Amenities and Leisure	This policy seeks to maintain and sustain access and accessibility to a range of community facilities and resources.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.
Lifestyle	This policy will not influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy will not influence health	0	0	Inclusive.	No additional recommendations.

	needs.			No particularly sensitive protected characteristic.	
Environment	This policy will not materially impact upon the urban environment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Food Access	The policy seeks to retain and maintain the sustainability and viability of retail areas.	0	+	Inclusive, and particularly valuable to individuals with restricted or impaired mobility.	No additional recommendations.
Community Cohesion	The policy seeks to retain and maintain valuable community assets important to health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

DM14: Commercial and Leisure Area at Brighton Marina	<p>In order to maintain and enhance the special commercial and leisure offer within Brighton Marina, changes of use will be permitted provided that all of the following criteria are met;</p> <p>a. The proposed use would improve the vitality and viability of the Marina, by encouraging combined trips and attracting pedestrian activity; and b) The development would not be materially detrimental to the amenities of occupiers of nearby properties or the general character of the Marina; and c) A window display is provided to retain an active frontage.</p> <p>A change of use at ground floor level to residential in retail / commercial/ leisure frontages will not be permitted but may be considered appropriate on upper floors.</p>				
Demography	This policy will not directly influence demography, but seeks to support population growth.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	The policy is intended to maintain and enhance the vitality and viability of the Marina, as an independent component of the City (residential, commercial, tourism,	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

	recreation etc), generating and sustaining significant direct, indirect and induced income and employment.				
Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy does allow change of use to residential and may have positive impacts on housing provision.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not directly influence transport.	0	0	Inclusive. No particularly sensitive protected characteristic.	Overlaps with DM32, DM33, DM34 and DM35.
Crime and Safety	This policy will not influence crime.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to maintain and sustain access and accessibility to a range of community facilities and resources.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy seeks to maintain and sustain access and accessibility to a range of community facilities and resources.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	This policy is flexible, and may support a range of service and facility options beneficial to maintaining healthy lifestyles.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Health Needs	This policy is flexible, and may support a range of service and amenities beneficial to maintaining health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	Cumulative change in health care demand addressed through CPP1 DA2 and Infrastructure Delivery Plan No additional recommendations.
Environment	This policy is intended to sustain and enhance the quality of the urban and retail environment.	0	+	Inclusive. No particularly sensitive protected characteristic.	Protection of the Sea Front and associated marine environment addressed through Policy DM 38. No additional recommendations.
Food Access	The policy seeks to retain, maintain and enhance the sustainability and viability of retail areas and community assets.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy will not influence community cohesion.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

DM16: Markets	<i>Proposals for new or expanded markets should be located within the city's shopping centres as defined by City Plan Part One Policy CP4 Retail Provision. When considering applications for new permanent or expanded markets the following criteria will apply; planning permission will be refused for development which would result in the permanent loss of markets or pitches unless appropriate comparable replacement provision is made subject to the impact on existing shopping facilities and markets; proposals for new or improved markets and market stalls will be permitted within defined shopping centres where they would not cause individual or cumulative harm to the local area in terms of residential amenity, pedestrian and highway safety, parking congestion, cycle routes or the free flow of traffic, especially public transport; proposals should result in improvements to the markets' environment and management; and the council will ensure the appropriate control of hours of operation and that adequate arrangement is made for storage and disposal of litter and refuse, parking including cycle parking and servicing. Temporary permissions and/or planning conditions may be used to assess or regulate the impact of markets, including proposals for farmers markets, temporary markets or car boot sales.</i>				
Demography	This policy will not influence demography.	0	0	Inclusive.	No additional recommendations.

				No particularly sensitive protected characteristic.	
Income and Employment	The policy seeks to retain and enhance income and employment opportunities from Markets, and the indirect and induced income and employment they generate, balanced against minimising conflicting land use or impacting upon residents.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy will not influence housing.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	Policy could influence modal or travel, including through sustainable and active forms of transport.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Crime and Safety	This policy will not influence crime.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy will not materially influence access and accessibility.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities	The policy seeks to retain and enhance additional retail opportunities.	0	+	Inclusive. No particularly sensitive protected	No additional recommendations.

and Leisure				characteristic.	
Lifestyle	This policy will not influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy will not influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	The policy seeks to support and enhance market provision, balanced against minimising disruption or impact to residents, or result in conflicting land use.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Food Access	Improves access to food markets.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy will not influence community cohesion.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

<b>DM24: Advertisements</b>	<p><i>Consent will be granted for advertisements and/or signs where they are sensitively designed and located so that they do not harm the visual amenity of the site or wider area and do not adversely affect public safety. Consideration will be given to: the character of the area, the siting of advertisements, size and proportion, design, materials, lettering and colour, means of fixture, method and extent of illumination, any sounds or animation, and cumulative impacts.</i></p> <p><i>Advertisements affecting a heritage asset or its setting must cause no harm to the identified significance of the asset. Particular regard will be had to the impact on any important architectural or historic features of the site and to the chosen materials and finish of the advertisement. Illumination should be by means of individual halo or internally illuminated letters on an unlit background or by means of discreet external trough lights or spot lights.</i></p> <p><i>Advertisements outside the built-up area must be discretely sited and sensitively designed to be in keeping with the rural area and landscape character.</i></p>
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	<p><i>Illumination should be strictly limited and must respect the setting of the SDNP.</i></p> <p><i>Where advertisements are viewable from the SRN they must not distract from road users.</i></p> <p><i>Applications for advertisement hoardings or scaffold shrouds will be subject to particular scrutiny due to their scale and potential impact on amenity and public safety. Any consent granted will be for a strictly limited period only.</i></p>				
Demography	This policy will not influence demography.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	This policy will not influence income and employment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will not influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy will not influence housing.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not influence transport.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Crime and Safety	The policy could support public safety, particularly addressing the potential impacts of advertising on road-users and may help prevent distraction.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and	This policy will not influence access and	0	0	Inclusive.	No additional recommendations.

Accessibility	accessibility.			No particularly sensitive protected characteristic.	
Services, Amenities and Leisure	This policy will not influence services and amenity.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	This policy will not influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy will not influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	The policy is intended to support high quality urban environments and prevent intrusion or annoyance within residential areas.	0	+	Inclusive. No particularly sensitive protected characteristic.	Overlap with SPD07 No additional recommendations.
Food Access	This policy will not influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy will not influence community cohesion.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

<b>DM35: Travel Plans and Transport Assessments</b>	<p><i>Transport Statements, Transport Assessments and Travel Plans should be provided to support planning applications for all developments that are likely to generate significant amounts of movement/travel in line with the NPPF or any subsequent national or locally derived standards and guidance.</i></p> <p><i>Larger developments requiring Transport Assessments should also consider the cumulative transport impacts arising from other committed or planned developments (i.e. development that is permitted or allocated and there is a reasonable degree of certainty delivery will occur). Development will not be permitted where the residual cumulative impact of the development is severe, unless provision is made for appropriate mitigation.</i></p> <p><i>Major developments within AQMAs should be supported by a Transport Statement or Transport Assessment (as appropriate) so that the potential impact of traffic on air quality can be adequately considered within a separate Air Quality Assessment (AQA). Transport Statements or Transport Assessments for developments elsewhere should consider traffic impacts within AQMAs to inform decisions about whether an AQA is required.</i></p> <p><i>All development proposals should include appropriate measures to ensure that journeys by private car are minimised and to make the greatest possible use of sustainable travel in order to deliver the objectives for sustainable transport set out in Policy CP9 of the City Plan Part One. Where necessary, planning obligations will be sought to facilitate or support such measures.</i></p> <p><i>Proposals that could cause significant noise or air quality impacts or create significant disturbance or intrusion during the demolition and construction processes will be required to submit a Construction &amp; Environmental Management Plan.</i></p>				
Demography	This policy will not directly influence demography.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	This policy will not directly influence income and employment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	This policy will not directly influence housing.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Transport	The policy seeks to manage the transport needs of the city, balanced against supporting the delivery of an urban environment conducive to healthy, vibrant and cohesive communities.	0	+	Inclusive. No particularly sensitive protected characteristic.	Sustainable/ active travel further addressed through Policy DM32 and also CP9 of CPP1. No additional recommendations.
Crime and Safety	This policy will not directly influence crime, but does facilitate a modal offset to active transport through the planning/coordination of transport plans.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	The policy seeks to manage the transport needs of the city, balanced against supporting the delivery of an urban environment conducive to healthy, vibrant and cohesive communities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy will not directly influence services and amenities.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	The policy seeks to manage the transport needs of the city, balanced against supporting the delivery of an urban environment conducive to healthy, vibrant and cohesive communities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy is not anticipated to	0	+	Inclusive.	No additional recommendations.

	directly influence health care need, but will contribute towards the delivery of an urban environment conducive to healthy, vibrant and cohesive communities (preventing and delaying the onset of poor health and associated health care.			No particularly sensitive protected characteristic.	
Environment	This policy facilitates the improvement of local air quality through the requirements for a TA in developments located near AQMAs, which will promote a healthier urban environment as well as those outside AQMAs..	0	+	Inclusive.  No particularly sensitive protected characteristic, however recognised that air quality can particularly impact upon older, younger, and people with certain medical conditions.	No additional recommendations.
Food Access	This policy will not directly influence food access.	0	0	Inclusive.  No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	The policy seeks to manage the transport needs of the city, balanced against supporting the delivery of an urban environment conducive to healthy, vibrant and cohesive communities.	0	+	Inclusive.  No particularly sensitive protected characteristic.	No additional recommendations.

<p><b>DM40: Protection of the Environment and Health-Pollution and Nuisance.</b></p>	<p><i>Planning permission will be granted for development proposals that enhance the City's high-quality environment and can demonstrate that they will not give rise nor be subject to material nuisance and/or pollution that would cause unacceptable harm to health, safety, quality of life, amenity, biodiversity and/or the environment (including air, land, water and built form). Proposals should seek to alleviate existing problems through their design.</i></p> <p><i>Proposals liable to cause or be affected by pollution and/or nuisance will be required to meet all the following criteria: be supported by appropriate detailed evidence that demonstrates: the site is suitable for the proposed use and will not compromise the current or future operation of existing uses; pollution and/or nuisance will be minimised; appropriate measures can and will be incorporated to attenuate/mitigate existing and/or potential problems in accordance with national and local guidance; and, appropriate regard has been given to the cumulative impact of all relevant committed developments as well as that of the proposal and/or effect of an existing pollution/nuisance source; support the implementation of local Air Quality Action Plans and help support the local authority meet the Government's air quality and other sustainability targets; provide, when appropriate, an Air Quality Impact Assessment to consider both the exposure of future and existing occupants to air pollution, and, the effect of the development on air quality. Air quality improvements and/or mitigation must be included wherever possible; have a positive impact, where practicable, on air quality when located within or close to an Air Quality Management Area and not worsen the problem. Particular regard must be given to the impacts of emissions from transport, flues, fixed plant, and, heat and power systems; e) New biomass combustion and CHP plants associated with major developments will not be acceptable in or near an Air Quality Management Area and sensitive receptors such as the Royal Sussex County Hospital due to the need to comply with nitrogen dioxide limits; and, ensure outdoor lighting is well designed; low impact; efficient; the minimum necessary with an appropriate balance between intensity, fittings, height and structures; and, not cause unacceptable detriment to public and highway safety, biodiversity in particularly priority habitat and species, the night sky and the South Downs National Park International Dark Sky Reserve.</i></p> <p><i>When a proposal, including the remediation measures, invokes the need for an Environmental Impact Assessment the findings of the assessment must be appropriately taken into account in the proposal.</i></p>				
Demography	This policy will not directly influence demography.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	This policy will not directly influence income and employment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy will not directly influence education, it does however set out standards for areas that are suitable for	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

	schools to be built, with regards to air quality and nuisance (i.e. site suitability).				
Housing	This policy will not directly influence housing, it does however set out standards for areas that are suitable for residential developments to be built, with regards to air quality and nuisance (site suitability).	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy will not directly influence transport.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Crime and Safety	This policy will not influence crime but seeks to improve the safety and wellbeing of residents through hazard management and avoidance (i.e. remove or control hazards and their potential community exposure through planning and mitigation).	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy is not anticipated to directly influence access and accessibility.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy is not anticipated to directly influence services and amenities, however it does influence the suitability of sites for development (potentially including amenities).	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	This policy is not anticipated to directly influence lifestyle.	0	0	Inclusive. No particularly sensitive protected	No additional recommendations.

				characteristic.	
Health Needs	The policy reinforces/complements the regulatory planning and permitting process set to be protective of the environment and health.	0	+	Inclusive, but a disproportionate benefit to the elderly and those individuals whose health may already be compromised.	No additional recommendations.
Environment	The policy reinforces/complements the regulatory planning and permitting process set to be protective of the environment and health. Should help prevent deterioration of air quality, particularly in areas of poor air quality or near sensitive receptors	0	+	Inclusive. May be particularly beneficial for all individuals living within AQMAs, but particularly those more vulnerable to effects of poor air quality such as younger, older and peoples with certain medical conditions.	CPP1 CP18 defined best practice and is only now picked up by the recent amendment to the EU EIA Directive and its transposition into UK Planning. There may be a need to provide guidance on how population and health is addressed through development in the city, as there may be some confusion as to whether a separate HIA is needed to comply with CP18 in addition to an EIA, or whether it is included under the Population and Health requirement.
Food Access	This policy is not anticipated to directly influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	The policy reinforces/complements the regulatory planning and permitting process set to be protective of the environment and health, and in doing so, supports the delivery of an urban environment conducive to facilitating a healthy, vibrant and cohesive community.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

SA7: Benfield Valley	<p><i>Land at Benfield Valley will be protected and enhanced as an important green wedge into the urban area and a valued Local Wildlife Site and Local Green Space. The council will promote and support the careful use and management of land and buildings at Benfield Valley to achieve the following objectives: the continued protection and enhancement of the wider biodiversity and landscape role and character of Benfield Valley as an important green wedge connecting the urban area to the South Downs National Park; securing biodiversity conservation and enhancements; including wildlife connectivity and buffer zones, as well as the ongoing and positive management of wildlife habitats and securing a long term funded management and maintenance plan to be agreed with the council; the creation of 'gateway' facilities and interpretation facilities in connection with the South Downs National Park; the protection and enhancement of the open spaces at Benfield Valley to include a long term funded management and maintenance plan to be agreed with the council; improved public access through the site and to the wider natural environment through the provision and improvement of safe pedestrian and cyclist access including the north/ south linear footpath/cycleway on the eastern side of Benfield Valley and existing rights of ways; the sympathetic repair and re-use of Benfield Barn and its associated structures and walls in a way that is compatible with and integrates with the landscape character of Benfield Valley, the wider natural environment and the Benfield Barn Conservation Area.</i></p> <p><i>Residential development in accordance with the identified development areas shown to the north and south of Hangleton Lane will be permitted provided that such development addresses the key considerations set out in Policy (H2 Urban Fringe Housing Sites). Inclusion of housing for older people will be encouraged (see also Policy DM4). Development proposals will be required to preserve the settings of the Benfield Barn and Hangleton Conservation Areas and contribute towards the achievement of the key objectives as listed above (cross reference to H2 Urban Fringe Housing Sites and SA4 City Plan Part One).</i></p> <p><i>Appropriate uses of the Benfield Barn and outbuildings within the conservation area will be non-intensive community and /or recreational facilities appropriate to the area. Proposals for the use of the buildings should include provision for a respective long term funded management and maintenance plan, to be agreed with the council.</i></p> <p><i>Development proposals will be subject to the criteria set out in Policy SA4 City Plan Part One.</i></p>				
Demography	This policy has the potential to facilitate natural population growth.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Income and Employment	This policy will not directly influence income and employment.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Education	This policy will not directly influence education.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Housing	The policy outlines the potential for housing development, including the potential for 3 stories and higher densities that do not materially impact upon the area. Policy supports housing for older people	0	+	Inclusive. Housing for older people would particularly benefit this characteristic group.	No additional recommendations.
Transport	With population growth comes a corresponding increase in transport requirements.	0	0	Inclusive. No particularly sensitive protected characteristic.	Transport requirements addressed through DM32, DM33, DM34 and DM35.  No additional recommendations.
Crime and Safety	This policy will not influence crime, but seeks to improve pedestrian and cyclist safety.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to increase the housing stock and quality balanced against protecting areas of open space and biodiversity.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy seeks to protect and enhance Benfield Valley as an important green space in the city, thus increasing its use as a public recreational and leisure space.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Lifestyle	This policy contributes towards meeting the city's housing target, while protecting and enhancing a valuable area of open space of benefit to health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Health Needs	This policy is not anticipated to directly influence health needs, but supports the development of creating an urban environment and housing conducive to good health and wellbeing.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	This policy balances housing provision with the retention and preservation of an important local green space which will provide a healthy urban environment beneficial to preserving both human and environmental health, as well as wildlife.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Food Access	This policy is not anticipated to directly influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy seeks to accommodate natural population growth and enable longstanding social and family networks, while supporting the development of shared amenities and social capital key to community cohesion.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

<b>H1: Housing and Mixed- Use Sites</b>	The sites listed are allocated for housing (Use Class C3) or mixed-use development including housing and other specified uses. Planning permission will be granted for proposals that accord with the Development Plan and which provide minimum indicative amounts of development shown in the tables. The following additional criteria apply to certain sites where indicated:				
	<ul style="list-style-type: none"> <li>For sites marked with an omega (Ω), occupation of the development will be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider;</li> <li>For sites marked with a hash (#), the layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.</li> </ul>				
Demography	This policy identifies the opportunity to develop 39 sites which will facilitate natural population growth.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

Income and Employment	The policy includes the provision of several mixed-use sites including business and employment floorspace, and commercial use which will provide a variety of short and long term direct, indirect and induced employment opportunities.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Education	This policy has the potential to increase the demand for educational facilities, as well as the capacity for education provision in the area.  However, this is addressed through CIL.	0	+	Inclusive. No particularly sensitive protected characteristic.	Change in demand addressed through CIL and S106.  No additional recommendations.
Housing	This policy will provide over 1050 new residential units, key to meeting housing targets, and accommodating natural population growth.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy is likely to result in increased transport demand within the areas.  However, addressed through overlapping policy.	0	+	Inclusive. No particularly sensitive protected characteristic.	Sustainable/ active travel further addressed through Policy DM32 and also CP9 of CPP1.  No additional recommendations.
Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy will not directly influence access and accessibility.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy will facilitate population growth, and with it demand for services, amenities and leisure, however, this is addressed more broadly through	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

	the DM policies.				
Lifestyle	This policy will not directly influence lifestyle.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Health Needs	This policy is not anticipated to influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	Any major construction has the potential to impact local amenity (from air quality and noise pollution). However, developments will comply with environmental objective levels set to protect health.  Once operational, homes will be compliant with the DM policies ensuring housing design, suitability and quality.  Requirements relating to protection of water supply supports provision of clean water.	0	+	Inclusive. No particularly sensitive protected characteristic.	Environmental construction issues will be addressed at project level, subject to DM39/ CP18, and are likely to be further assessed through an appropriately scoped EIA and or HIA.  No additional recommendations.
Food Access	This policy is not anticipated to directly influence food access.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy is not anticipated to directly influence community cohesion.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

<p>H2: Urban Fringe Housing Sites</p>	<p><i>The developable areas of the sites listed are allocated for housing development (Use Class C3). Planning permission will be granted for proposals that accord with the Development Plan (having particular regard to Policies SA4 and SA5) and which meet the indicative site/development requirements in Table 7 and all of the following criteria: a) Provision is made for 3+ bedroom family-sized dwellings in accordance with provisions the indicative percentages set out in Table 7; b) Opportunities to secure additional and /or improved publically accessible open space provision are incorporated within the proposed scheme; c) Green infrastructure and local food growing opportunities are incorporated within the proposed scheme; d) Development will mitigate any adverse impacts on designated sites and provide biodiversity net gains in accordance with Policies CP10 and DM37;e) Provision is made for sustainable transport infrastructure improvements that provide and promote sustainable transport and improved safe pedestrian and cyclist access to and through the site to support the development; f) Improved linkages and access to the South Downs National Park and surrounding areas are secured where feasible; and )g) Appropriate regard is given to the need for local community facilities; h) Given the council's ambition to become a carbon neutral city by 2030, development will be encouraged to achieve greater reductions in CO2 emissions through the use of passive design, fabric standards, energy efficiency measures and low and zero carbon technologies, in accordance with Policy DM44.i)Provision is made for a proportion of serviced plots for self and/ custom build dwellings unless it can be demonstrated that this would make the scheme unviable.</i></p> <p><i>The following additional criteria apply to certain sites where indicated:</i></p> <ul style="list-style-type: none"> <li><i>For sites marked with an omega (Ω), occupation of the development should be phased to align with the delivery of sewerage network reinforcement, in consultation with the service provider;</i></li> <li><i>For sites marked with a hash (#), the layout should be planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes.</i></li> </ul>				
<p>Demography</p>	<p>This policy includes the development of 16 sites for residential units, which will facilitate natural population growth and accommodate the needs for a wide demographic.</p>	<p>0</p>	<p>+</p>	<p>Inclusive. No particularly sensitive protected characteristic.</p>	<p>No additional recommendations.</p>
<p>Income and Employment</p>	<p>The policy seeks to improve housing stock, type and quality.</p>	<p>0</p>	<p>0</p>	<p>Inclusive. No particularly sensitive protected characteristic.</p>	<p>No additional recommendations.</p>
<p>Education</p>	<p>This policy will facilitate population growth, and with it, a proportionate increase in local education demand. However, this is addressed through the overlapping DM policies and CIL.</p>	<p>0</p>	<p>0</p>	<p>Inclusive. No particularly sensitive protected characteristic.</p>	<p>No additional recommendations.</p>

Housing	This policy will provide new residential units and also 3+ bedroom family-sized dwellings which will influence the quality, number, type and size of housing in the area.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Transport	This policy is likely to result in increased vehicular traffic in the area as well as increased demand for public transport, this is however addressed through the overlapping DM policies. Policy supports sustainable transport infrastructure which could be beneficial for health.	0	+	Inclusive. No particularly sensitive protected characteristic.	Sustainable/ active travel further addressed through Policy DM32 and also CP9 of CPP1.  No additional recommendations.
Crime and Safety	This policy will not influence crime and safety.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Access and Accessibility	This policy seeks to improve access and accessibility to housing, public open space and the South Downs National Park.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Services, Amenities and Leisure	This policy includes the provision of local community facilities and improves public open space. The loss of any community amenities or open space is addressed through the overlapping DM policies.	0	+	Inclusive. No particularly sensitive protected characteristic.	Loss of any community amenities and facilities is addressed through the overarching DM policies that seeks to minimise, replace and or enhance such amenities and facilities through development.  No additional recommendations.
Lifestyle	This policy will present the opportunity to improve lifestyle choices by providing improved access to housing, public open space and the South Downs National Park, which could enable recreational	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.

	activities and encourage a more active lifestyle.				
Health Needs	This policy is not anticipated to influence health needs.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Environment	Any major construction has the potential to impact local amenity (from air quality and noise pollution). However, developments will comply with environmental objective levels set to protect health.  Once operational, this policy should ensure ecological impacts are mitigate.  Requirements relating to protection of water supply supports provision of clean water.	0	+	Inclusive. No particularly sensitive protected characteristic.	Environmental construction issues will be addressed at project level, subject to DM39/CP18, and are likely to be further assessed through an appropriately scoped EIA and or HIA.
Food Access	This policy seeks to improve local food growing opportunities by incorporating this within the proposed scheme.	0	+	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.
Community Cohesion	This policy seeks to develop housing to complement and enhance host communities.	0	0	Inclusive. No particularly sensitive protected characteristic.	No additional recommendations.



Brighton & Hove  
City Council