

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

# **Sustainability Appraisal Addendum**

## **Proposed Main and Minor Modifications to the Proposed Submission City Plan Part Two**

**May 2021**



**Brighton & Hove  
City Council**

## Contents

1. Introduction .....	3
1.1 Purpose of this report.....	3
1.2 SA undertaken on City Plan Part 2 .....	3
1.3 Compliance with SEA Regulations.....	3
2. Methodology.....	7
2.1 SA Framework .....	7
2.2 Scoring methodology .....	11
2.3 Screening and assessment process.....	11
3. Screening stage .....	12
3.1 Introduction .....	12
3.2 Screening stage outcome.....	12
4. Assessment of Policies .....	13
4.1 Introduction and overview.....	13
4.2 DM12 Policy Re-appraisal .....	13
4.3 DM13 Policy Re-appraisal .....	14
4.4 DM37 Policy Re-appraisal .....	14
4.5 H1 Policy Re-appraisal.....	15
4.6 H2 Policy Re-appraisal.....	18
4.7 H3 Policy Re-appraisal.....	20
5. City Plan Part Two Mitigation .....	22
6. City Plan Part Two Cumulative Impacts .....	22
6.1 Introduction .....	22
6.2 Tables to show cumulative impacts.....	22
6.3 Discussion of cumulative impacts.....	24
6.4 Overall summary .....	26
6.5 Conclusion.....	26
7. Monitoring .....	27
8. Consideration of Alternatives .....	27
9. Next Steps .....	27
Appendix A Screening of Proposed Main Changes .....	28
Appendix B Screening of Proposed Minor Changes .....	95
Appendix C Policy Re-Appraisals.....	107
DM12 Regional, Town, District and Local Shopping Centres.....	107
DM13 Important Local Parades .....	110

DM37 Green Infrastructure and Nature Conservation.....	115
H1 Housing and Mixed-Use Site Allocations.....	118
H2 Urban Fringe Site Allocations .....	128
H3 Purpose Built Student Accommodation Allocations .....	139
Appendix D Site Assessments .....	144
H1 – Updated site assessments .....	144
H1 – Omission site assessments .....	172
H2 – Updated site assessments .....	180
Rejected Sites – sites not considered suitable for allocation .....	185
Appendix E List of sites no longer being allocating.....	193

## **1. Introduction**

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

This document comprises the Sustainability Appraisal Interim Addendum of the proposed changes to the Submission City Plan Part 2. It sets out the assessment findings and conclusions of the Sustainability Appraisal (SA), incorporating the requirements of Strategic Environmental Assessment, of the proposed changes to the Submission City Plan Part 2.

This report only considers the proposed minor and main changes to the City Plan Part 2. This SA Interim Addendum Report does not repeat information produced in the SA of the Proposed Submission (Regulation 19) stage City Plan Part 2 (April 2020) and should therefore be read alongside it.

The proposed changes have arisen as a result of representations received during consultation at Publication stage that took place between September and October 2020, as well as changes to the Use Class Order, July 2020.

### **1.2 SA undertaken on City Plan Part 2**

At each stage of preparation, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) has been undertaken and the following documents have been produced and made available for consultation:

- SA Scoping Report, 2016
- Draft City Plan Part 2 SA, June 2018
- Proposed Submission City Plan Part 2 SA, April 2020

### **1.3 Compliance with SEA Regulations**

This SA Addendum has been undertaken in order to be consistent and in compliance with the SEA process and regulations which requires SEA to be undertaken on modifications where they are significant in nature. <sup>1</sup>

The following table signposts to the components of the SA Report that make up the Environmental Report, as required by SEA Regulations, and to enable the reader to locate key components of this Appraisal process. This includes signposting to the SA Report April 2020, where information has not been repeated in or superseded by this Addendum Report.

---

<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 Regulation 5 (6)(b) "An environmental assessment need not be carried out for a minor modification to a plan or programme..."

**Table 1.1: SEA Requirements**

SEA Regulation	Requirements for Environmental Report	Component of SA Report: SA April 2020	Component of SA Report: SA Addendum 2021
Schedule 2 (1)	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 1.3 and 1.7 outlines the main objectives, content and relationship with other plans.  Section 3.11 includes the SA objectives	N/A. Refer to SA, April 2020.
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;	A summary of baseline information collected during the scoping stage, as updated is included in Section 3 and Appendix B. The likely evolution of existing conditions also considered within Section 3.	N/A. Refer to SA, April 2020.
Schedule 2 (3)	The environmental characteristics of areas likely to be significantly affected;	Baseline information collected during the scoping stage is summarised in Section 3.	N/A. Refer to SA, April 2020.
Schedule 2 (4)	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 3 outlines the sustainability problems and issues affecting area. This includes environmental problems. In particular, considerations of relevance to the Directives can be found under section 3.12 onwards.	N/A. Refer to SA, April 2020.

Schedule 2 (5)	The environmental protection objectives, established at international, Community or national 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;	Section 3 updates the policy context as described in full in the Scoping Report. Appendix A sets out the documents reviewed to determine the policy context.	N/A. Refer to SA, April 2020.
Schedule 2 (6)	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Assessments for all Proposed Submission policies summarised in section 5. Full results in Appendix G. Cumulative impacts summarised in Section 8.	Assessments for policies DM12, DM13, DM37, H1, H2 and H3 supersede those within the Proposed Submission SA. Appraisals summarised in section 4. Full appraisals in Appendix C.  Cumulative impacts arising from the proposed changes assessed in Section 6.
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;	Mitigation measures are discussed within the policy appraisals in Appendix G and within Section 7.	Mitigation measures for policies DM12, DM13, DM37, H1, H2 and H3 discussed in section 4 where relevant.  Mitigation for the CPP2 as a whole are still located within Section 7 of the SA, April 2020.
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 (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	A description of alternatives considered leading up to Proposed Submission stage is found within Appendix D. Difficulties encountered are found within Section 2.4	N/A. Refer to SA, April 2020.

Schedule 2 (9)	a description of measures envisaged concerning monitoring;	The proposed indicators to monitor the effects are set out in Section 10.	N/A. Refer to SA, April 2020.
Schedule 2 (10)	a non-technical summary of the information provided under the above headings	Within separate document (NTS 2020).	To be produced for public consultation following Examination in Public for an updated and revised SA Addendum undertaken to assess any further modifications arising from the EIP.

## 2. Methodology

### 2.1 SA Framework

The SA has tested the proposed changes to the Submission City Plan Part 2 against a framework of objectives that reflect relevant sustainable development policy objectives. This framework was initially set out in the Scoping Report, 2016 and has been used at each stage of assessment of the City Plan Part 2.

**Table 2.1: Sustainability Appraisal Framework**

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

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

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

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

## 2.2 Scoring methodology

The SA uses the following methodology to demonstrate impact:

++	Policy has strong positive impact
+	Policy has positive impact
0 or blank	Policy has no impact
-	Policy has negative impacts
	Policy has strong negative impacts
?	Impacts uncertain
-/+	Policy has mixed impacts

The multiple symbols were also used to indicate significance. 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

## 2.3 Screening and assessment process

The appraisal undertaken at this stage comprises a two stage process, consisting of an initial screening stage which considers the type of change and whether it could have an effect on any of the sustainability appraisal objectives, followed by full re-assessment only if the screening stage indicates there likely to be a change in the previous appraisal findings. Where policies are fully reassessed, the changes are assessed within the wider context of the overall policy and supporting text.

The screening stage is set out in section 3. Re-assessments can be found in Section 4 and Appendix A and B.

### 3. Screening stage

#### 3.1 Introduction

The aim of the screening stage is to identify changes which are considered to make a difference to the previous Sustainability Appraisal findings of the City Plan Part 2 and are therefore considered to be significant enough to require re-appraisal.

#### 3.2 Screening stage outcome

A total of 137 changes have been proposed, comprised of 95 main changes and 43 minor changes. The full wording of all changes can be found in Appendix A (main changes) and Appendix B (minor changes).

The screening process identified three main types of effects:

- no impact on any of the Sustainability Appraisal objectives, e.g. modification is of an editorial nature or for clarification/information purposes. **Screened out from further assessment.**
- a minor positive or negative effect on one or more of the Sustainability Appraisal objectives, e.g. may strengthen/weaken a policy, but does not change the previous SA findings. **Screened out from further assessment.**
- a major positive or negative effect on one or more of the Sustainability Appraisal objectives, that results in a change to the previous SA findings. **Screened in for further assessment.**
- no change to the likely effects, however a major or significant change to either the policy or to a significant amount of SA commentary. **Screened in for further assessment.**

Where a major positive or negative effect has been identified, or the change is significant or could result in a major change to SA commentary, a full re-appraisal of that policy has taken place.

None of the minor changes were found to result in the need of re-appraisal. Six policies were considered to require re-appraisal. The full results of the screening exercise can be found in Appendix A and Appendix B. The appraisals can be found in Section 4.

## 4. Assessment of Policies

### 4.1 Introduction and overview

At this stage, an appraisal of 6 policies has taken place ensure the appraisal considers the effects of implementing these policies with the proposed changes. Each policy was assessed against the sustainability appraisal objectives set out in the methodology. The following policies have been re-appraised:

- DM12 Regional, District, Town and Local Centres
- DM13 Important Local Parades
- DM37 Green Infrastructure and Nature Conservation
- H1 Housing Sites and Mixed Use Sites
- H2 Housing Sites – Urban Fringe
- H3 Purpose Built Student Accommodation Sites

Sections 4.2 to 4.7 summarises the results of the re-appraisals. The full appraisals can be found in Appendix C.

### 4.2 DM12 Policy Re-appraisal

#### Summary

- The policy could have positive impacts for the objectives for heritage, reducing the need to travel, air quality, best use of land, and housing. The policy could help to reduce vacancy through general support for E, F1 and F2 uses within centres and through allowing temporary uses, and this could help contribute towards enhancing or improving heritage assets in centres where relevant. The location of E, F1 and F2 uses within centres may help to reduce the need to travel further to access these services, also having air quality benefits. The flexibility of the policy, as well as the support for 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 should also have positive impacts on the objectives for access to services, health, community safety and equalities. Although the policy is no longer able to seek a proportion of certain uses which could lead to a reduction in availability and accessibility of certain types of use within the E use class, the policy still supports E, F1, F2 and other uses within the designated centres, and is considered to still support availability and accessibility of services, although the policy is not considered to be as strong as previous iterations in this respect. The support for these uses within centres has benefits for health, particularly for proximate communities through the potential for active travel as well as the potential to access health-type services. This will also benefit those who are less able to travel further, including those with protected characteristics, such as younger, older and disabled people.
- The policy is considered to have mixed negative and positive impacts for the employment & economy objective. This reflects the flexibility that the policy now provides, allowing the market to decide, which could help to reduce vacancies and the positive aspects of the policy in relation to supporting uses that will provide footfall and vitality; however reflects the risk that this flexibility could be of detriment to the Regional Centre, potentially impacting upon the status and attractiveness of the centre for those who visit from outside the city for shopping purposes, having wider economic consequences.

#### Recommendations at this stage and mitigation

- Although there is potential for mixed impacts on the economy/employment objective, there are no further recommendations, as changes reflect legislative changes to the use class order.

- Mitigation would be provided through ongoing monitoring of commercial units, as proposed in the updated Monitoring & Implementation target for this policy.

### 4.3 DM13 Policy Re-appraisal

#### Summary

- The policy should have positive impacts on the objectives for heritage, reducing the need to travel, air quality, best use of land, and housing. The policy could help to reduce vacancy through general support for E uses within ILPs and through allowing temporary uses, and this could help contribute towards enhancing or improving heritage assets where relevant. The designation of ten ILPs should ensure that communities can meet some needs locally, thus reducing the need to travel for some journeys, promoting active travel for proximate communities, also having benefits for air quality. It contributes towards making the best use of premises through the flexible approach whereby all E uses are supported, potentially helping to reduce vacancy. The policy allows change of use to housing in certain circumstances, supporting housing delivery.
- The policy should also have positive impacts on the objectives for access to services, health, community safety, equalities and economic development. Although the policy is no longer able to seek a proportion of certain uses which could lead to a reduction in availability and accessibility of certain types of use within the E use class, the policy still designates ten ILPs, supports E and other uses within the parades, and is considered to still support availability and accessibility of services, although the policy is not considered to be as strong as previous iterations in this respect. The designation of ILPs also has benefits for health, particularly for proximate communities through the potential for active travel as well as the potential to access health-type services within ILPs. This will also benefit those who are less able to travel further, including those with protected characteristics, such as younger, older and disabled people. The policy should also ensure that the vibrancy and vitality of ILPs is maintained, and the flexibility that the E use class provides, in relation to units changing easily and the potential for reductions in vacancy rates that may arise, could help to support the local economy in these areas, support passive surveillance and community safety.

#### Recommendations at this stage and mitigation

- There are no further recommendations or requirements for mitigation.

### 4.4 DM37 Policy Re-appraisal

#### Summary

- The policy is considered to have significant positive impacts for 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, and the enhancement of 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, should ensure impacts are mitigated in accordance with the mitigation hierarchy and should achieve net gains in biodiversity. Some of the proposed changes are considered to strengthen the policy as should ensure greater consideration of the mitigation hierarchy for development on all sites, as well as biodiversity net gain principles.
- 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 positive impacts for reducing greenhouse gas emissions, making the best use of land and protecting the SDNP, 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 sets out criteria whereby development will be permitted on nature conservation sites under certain circumstances and resultant losses in open space that would arise, as the majority are designated open space, which is not required to be mitigated within the policy.

#### **Recommendations at this stage and mitigation**

- No further recommendations
- 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.

## **4.5 H1 Policy Re-appraisal**

### **Overall Summary**

- The policy was found to have potential for significant positive impacts for the housing objective; sites allocated could deliver an indicative 748 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 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, and some sites' redevelopment could lead to loss of open space.
- 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 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 in addition to achieving 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 24 sites have some risk of either surface or groundwater flooding, although it is recognised that only 2 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; 24 sites are either within the AQMA and/or suffer from high levels of road/rail noise, which would require mitigation. However, 10 sites have neither 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.
- 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; 70% 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 this stage**

- No further recommendations

## 4.6 H2 Policy Re-appraisal

### Summary

- The policy was found to have potential for significant positive impacts for housing as should result in 899 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 publicly 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 the 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 did not categorise any allocated sites as being of a risk that required sequential/exception test. In addition the policy was found to 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.82% 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.

**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 potential for landscape impacts should be addressed through CPP1 SA5 SDNP and SA4 Urban Fringe which requires the protection and enhancement of the landscape role of the urban fringe.
- 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.
- All development proposals are required to include measures to minimise use of private car. In addition, CPP2 policy Travel Plans and Transport Assessment 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.
- Loss of open space should be addressed through policy CP16 which should ensure that developments improve open space and delivers new open space provision.
- Any risk of on-site flooding and increasing flooding elsewhere should be addressed through CPP1 CP11 Flood Risk and CPP2 policy Sustainable Drainage.
- 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.
- Any risk to water quality should be addressed through CPP1 SA4 Urban Fringe policy which requires protection of GSPZ and draft CPP2 policy Protection of the Water Environment.
- All developments would need to address construction stage waste management, including demolition waste in accordance with the WMLP.

### Recommendations at this stage

- There are no further recommendations.

## 4.7 H3 Policy Re-appraisal

### 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 are within the AQMA. Although development would not result in loss of, 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 positive impacts on soil quality, due to the potential for contamination and therefore remediation on some sites, and on water quality, due to requirements that should protect groundwater resources.
- The policy was found to have potential for adverse impacts on the flood risk and waste objectives. Both 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.
- 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 this stage**

- There are no further recommendations.

## 5. City Plan Part Two Mitigation

No additional mitigation is proposed. Overarching mitigation measures for CPP2 are set out in Section 7 of the Proposed Submission Sustainability Appraisal, April 2020.

## 6. City Plan Part Two Cumulative Impacts

### 6.1 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 consideration of various effects. This section therefore concentrates on cumulative effects.

### 6.2 Tables to show cumulative impacts

As some of the assessments have resulted in a change to scores, cumulative impacts need to be reconsidered at this stage. The following tables help to show the cumulative effects of the short-term impacts of the Site Allocations policies and DM policies. The final rows help to show the overall impacts of the City Plan Part Two against each of the 19 Sustainability Appraisal objectives (pre-mitigation).

#### Special Area and Site Allocations policies appraisal results

	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
E1	-/+	-	-	0	-	-/+?	0	-	0	-	0	+	+	0	0	+	0	+	++
All	-/+	+	-/0	-/+	-/+	-/+	+/0	-/+	+/0	-/+	+	-/+	+	++	++	+	+	+	++

Development Management policies appraisal results

	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	+	++	+	++	+	+	++

### 6.3 Discussion of cumulative impacts

This section only considers the cumulative effects for the objectives relating to accessibility, housing and economic development, as these are the only SA objectives that have resulted in changes since the Proposed Submission stage or where there has been a significant change. The discussion of cumulative effects for all other SA objectives can be found in Section 8 of the Proposed Submission SA, 2020.

#### 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 commercial and service 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, continues to encourage community, commercial and service uses within designated centres, 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.

### 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, 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 49 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.

### 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. Policies DM12, DM13, DM14, and DM15 support commercial and service uses within centres or other special areas, promotes footfall and therefore supports vitality and viability in centres and special areas, even with the policy approach not being considered as strong as previous policy iterations. 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, several 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 designated centres remain attractive, vibrant and viable, and should ensure that the city remains an attractive place to visit for business or leisure purposes.

## **6.4 Overall summary**

The cumulative impacts of the DM policies are considered 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 addresses 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.

## **6.5 Conclusion**

Although some of the appraisals have changed, the cumulative impacts arising from the implementation of the proposed submission City Plan Part Two (with proposed changes) are not considered to be different to those identified at Publication stage.

## **7. Monitoring**

No changes to monitoring are proposed. Monitoring measures are set out in Section 10 of the Proposed Submission Sustainability Appraisal, April 2020.

## **8. Consideration of Alternatives**

A key aspect of the SA process is the testing of alternative options. A number of policy options were subject to appraisal throughout the preparation of the City Plan Part 2. The results of these assessments are all set out in the Proposed Submission SA report.

No alternatives have been put forward to the proposed changes as they are being proposed in order to ensure legal compliance and soundness. The do-nothing option is not considered a reasonable alternative at this stage, particularly in relation to those relating to changes to the Use Class Order.

## **9. Next Steps**

The City Plan Part Two and all other relevant documentation as identified in the Examination Library will be submitted to the Planning Inspectorate in May 2021 for examination in public. Following the examination, the proposed changes to the City Plan Part Two as assessed in this SA Interim Addendum will be consulted upon, along with any other modifications arising from the EIP.

## Appendix A Screening of Proposed Main Changes

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM1	Policy DM9, page 40	<p><b><i>DM9 Community Facilities</i></b>  <i>Amend part 1 of policy to read:</i></p> <p>1. Planning permission will be granted for new community facilities <u>in Regional, Town, District and Local Centres in accordance with Policy DM12 and in other locations</u> where all of the following criteria are met:</p>	<p>The proposed amendments are to ensure consistency with policy DM12, which has been amended to reflect changes to the use class order. Policy DM12 supports community facilities falling under the E, F1 and F2 use class within the designated centres. Support for the location of community uses within designated centres brings positive benefits for various SA objectives including objective 5 (reducing the need to travel by car) due to the accessible nature of designated centres and proximity to populations; objective 15 (increasing access) due to support for delivery of new services, as well as their accessible location; objective 16 (health) due to support for delivery of new services, as well as the accessible nature of the centres which could support active travel; and objective 19 (economy) due to the potential to support vitality and vibrancy of designated centres as well as through increased footfall. These potential benefits relating to the location of community facilities within designated centres have already been considered within the Proposed Submission SA of DM9. This proposed change is therefore not considered to have any further implications for the SA assessment and does not change the results of the previous SA assessment for this policy.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM2	Supporting text to Policy DM9, paragraph 2.79	<p><b><i>DM9 Community Facilities</i></b>  <i>Amend the bullet points in paragraph 2.79 to read:</i></p>	<p>Proposed changes to DM9 have been largely made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	pages 40 - 41	<p>2.79 The term ‘community facilities’ encompasses a wide range of facilities and services which are defined in national policy as being social, recreational and cultural in nature. They can be broadly separated into the following types of use:</p> <ul style="list-style-type: none"> <li>• <u>Medical or health services (use class E(e));</u></li> <li>• <u>Creche, day nursery or day centre (use class E(f));</u></li> <li>• <u>Learning and non-residential Institutions (Use Class F1 D1) – these are defined by the Use Classes Order and include education uses (non-residential), health clinics/GP surgeries, day nurseries/crèches, law courts, training centres, museums, public libraries, public halls and places of worship;</u></li> <li>• <u>Local community uses (use class F2) – isolated local shops selling essential goods, halls or meeting places for the principal use of the local community. Areas of outdoor sport or recreation, swimming pools and skating rinks also fall within the F2 use class, and are protected by City Plan Part One Policy CP17;</u></li> <li>• <u>Essential community public sector infrastructure including to meet the needs of the city. This includes:</u> <ul style="list-style-type: none"> <li>○ Facilities for the emergency services including the NHS and Fire, Police and Ambulance Services;</li> <li>○ Public toilets; and</li> <li>○ Prison and custody facilities.</li> </ul> </li> <li>• <u>Cultural and social facilities which perform an important role in the health and wellbeing and ‘quality of life’ of the city’s residents. Arts and performance venues. These include theatres, cinemas, public houses, social clubs, night time</u></li> </ul>	<p>This proposed change is in the supporting text. It clarifies the different types of community facilities and their different use class to reflect changes to the use class order. The previous SA assessment found the policy to have potential for either positive or significant positive effects for various related objectives including 15 (increasing access) due to support for new and resistance of loss of community facilities); 16 (health) due to the health benefits that provision of these services can bring; and 18 (equalities and inclusion) due to the potential to increase access to education and other services, including for those with protected characteristics. In addition to these impacts, community facilities falling under the F2 use class could have positive benefits for SA objective 6 (reducing the need to travel); as well as for 16 (health) due to the potential to increase access to sports/recreation, and 18 (equalities) due to the positive impacts that individual local shops can have on those that may not be able to travel further, such as younger, older or people with certain health needs. Although the potential for the policy to increase access to sports/recreation and therefore support healthy lifestyles through F2 uses was not referred to in commentary of the Proposed Submission SA, the SA found the impacts of the policy to be significantly positive for the health objective. The inclusion of facilities under the F2 use class is considered to strengthen but not change the results of the previous SA assessment for this policy. No additional SA assessment of this policy is considered necessary.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><del>venues, bingo halls, and sport facilities.</del> These types of venue are already protected by City Plan Part One Policy CP5.</p> <ul style="list-style-type: none"> <li>• <u>Public houses.</u> These are protected by Policy DM10.</li> </ul> <p><u>Some changes of use fall under permitted development and would not be covered by the scope of this policy, however it is considered important to maintain a range of community facilities by applying this policy where permitted development rights do not apply.</u></p>	
PM3	Supporting Text to Policy DM10, para. 2.85, page 42	<p><b>DM10 Public Houses</b>  <i>Amend paragraph 2.85 with an additional sentence at the end to read:</i></p> <p>“Public houses are important contributors to the character and vitality of communities, providing opportunities for social interaction, strengthening social cohesion and acting as a focus for the local community. <u>Proposals for new or extended public houses will be assessed using Part 1 of Policy DM9.</u>”</p>	<p>This proposed change is in the supporting text. It provides further clarity in relation to how new public house developments will be assessed. However, the proposed change is not considered to have any implications for the SA assessment and does not change the results of the previous SA assessment for this policy.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM4	Policy DM11, page 45	<p><b>DM11 New Business Floorspace</b>  <i>Amend Policy DM11 to read:</i></p> <p>Development proposals involving the provision of new <del>B1a, b and c</del> <u>E(g) (i), (ii) and (iii)</u> Use Class business floorspace, either in stand-alone commercial or mixed-use schemes, should provide for well-designed buildings and layouts suitable for incorporating a range of unit sizes and types that are flexible, with good natural light, suitable for sub-division and</p>	<p>All the proposed changes to DM11 have been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>Although the SA commentary under SA objective 19 (economy and employment) for this policy refers to B1 uses, the changes to the policy will not alter the result of the actual SA assessment. The previous SA assessment found</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>configuration for new <del>B1</del> <u>E(g)</u> uses and activities; and for new <del>B1c</del> <u>E(g)</u> (iii) light industrial, B2 industrial and B8 storage and warehousing premises include adequate floor to ceiling heights; floor loading, power, servicing and loading facilities.</p> <p>Redevelopment proposals on protected industrial estates will be supported where they provide an efficient use of the site/ premises to provide higher density and flexibly designed business premises for <del>B1</del> <u>E(g)</u>, B2 and/or B8 uses in accordance with City Plan Part 1 Policy CP3 Employment Land</p>	<p>the policy to have potential for significant positive effects for this objective through support for delivery of high-quality business floorspace that will meet a wide range of needs, thus contributing towards employment opportunities and economic growth. The proposed changes to the policy are not considered to change these effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM5	Supporting text to Policy DM11, page 45	<p><b>Policy DM11 New Business Floorspace</b> <i>Amend paragraph 2.97, first sentence to read:</i></p> <p>Flexible design features for new <del>B1a</del> <u>E(g)(i)</u> office floorspace include:</p>	See commentary for PM4
PM6	Supporting text to Policy DM11, page 46	<p><b>Policy DM11 New Business Floorspace</b> <i>Amend paragraph 2.98, first sentence to read:</i></p> <p>Where new <del>B1b</del> <u>E(g)(ii)</u> or <del>B1c</del> <u>E(g)(iii)</u> units are proposed the council...</p>	See commentary for PM4
PM7	Supporting text to Policy DM11, page 46	<p><b>Policy DM11 New Business Floorspace</b> <i>Amend paragraph 2.100, first sentence to read:</i></p> <p>Proposals that provide mix of <del>B-E(g)</del>, B2 and B8 use class employment uses must be designed to demonstrate there is adequate separation of uses, to ensure high standards of amenity.</p>	See commentary for PM4

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM8	Supporting text to Policy DM11, page 47	<p><b>Policy DM11 New Business Floorspace</b>  <i>Amend paragraph 2.102, fourth sentence to read:</i></p> <p>Where opportunities for redevelopment of older/ poor quality/ lower density industrial premises come forward on safeguarded industrial estates/ business parks, in accordance with CPP1 Policy CP3 Employment Land, the council will seek a mix of flexibly designed unit sizes suitable for a range of <del>B1</del> <u>E(g)</u>, B2 and B8 uses making efficient use...</p>	See commentary for PM4
PM9	DM12 pages 48-49	<p><b>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</b>  <i>Amend Policy DM12, including name to read:</i></p> <p><del>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</del></p> <p><del>To allow for diversification in shopping centres, change of use of an existing class A1 unit to non A1 town centre uses within the following designated shopping centres and as shown on the Policies Map, will be permitted where the following criteria are met;</del></p> <p><del>A) Regional, Town and District Shopping Centres</del></p> <p><del>i) — Changes of use of a ground floor Class A1 unit in the primary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 75% in the Regional Centre, and 50% in Town and District Centres (as a proportion of total units measured across the</del></p>	<p>Proposed changes to DM12 have been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>Due to the changes to the use class order, the policy is no longer able to seek to retain a proportion of certain uses. This is likely to weaken the policy in relation to certain SA objectives, such as 5 (reducing the need to travel), 15 (access to services) and potentially objectives 16 (health) and 18 (equalities), although the added flexibility may strengthen the policy in relation to SA objectives 13 (making the best use of land). Full SA assessment of policy DM12 has therefore been undertaken to assess the impacts of this and other changes within the wider context of the policy.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>total Primary Shopping Frontage), taking into account unimplemented planning permissions for changes of use;</p> <p>ii) — Changes of use of a ground floor Class A1 unit in the secondary shopping frontages will only be permitted where the proportion of Class A1 units would not fall below 35% in the Regional Centre and below 30% in the Town and District Centres (as a proportion of total units measured across the total Secondary Shopping Frontage), taking into account unimplemented planning permission for changes of use.</p> <p>iii) — Within the Lanes and North Laine areas the change of use should not result in a group of three or more adjoining units being in non-A1 use.</p> <p>iv) — The unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and</p> <p>v) — A shop front has been retained or provided;</p> <p>B) Local Shopping Centres</p> <p>i) — The proportion of Class A1 units in the centre would not fall below 50% (as a proportion of total units in the whole centre) taking into account</p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>unimplemented planning permission for changes of use;</p> <p><i>ii)</i> — <del>The shop unit has been marketed for a minimum of 6 months, at an appropriate rent (providing three comparable shop rents within the centre) with the marketing information clearly demonstrating that there is no realistic prospect of the unit being used for A1 use in the foreseeable future; and</del></p> <p><i>iii)</i> — <del>A shop front has been retained or provided.</del></p> <p><u>Commercial, business and service uses (use class E), learning and non-residential institutions (use class F1) and local community uses (use class F2) will be supported within the city’s defined Regional, Town, District and Local Centres (as set out in CPP1 policy CP4 and as shown on the Policies Map).</u></p> <p>1. <u>Proposals for other uses will be permitted where it can be demonstrated that the scheme meets all of the following criteria;</u></p> <ul style="list-style-type: none"> <li>a) <u>The proposal will maintain and enhance the vitality, viability and the character of the shopping area;</u></li> <li>b) <u>The proposal will retain active ground floor uses and frontage and provide a direct service or sales to visiting members of the public;</u></li> <li>c) <u>The proposed development or uses will not have a harmful impact on the amenity of local residents due to noise, odour, disturbance or light pollution (see DM21, DM40); and</u></li> </ul>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>d) <u>Where appropriate shop front design should be in accordance with the council’s shop front policy (see DM23).</u></p> <p>e) <u>In addition to criteria a-d) above, proposals within the Lanes<sup>1</sup> and North Laine<sup>2</sup> areas of the Regional Centre should not result in the amalgamation of three or more adjoining units resulting in an overly dominant unit, in order to retain the unique character of the area.</u></p> <p>2. Residential use may be appropriate above or to the rear of units in shopping centres provided the active frontage is not compromised and that satisfactory residential amenity can be achieved.</p> <p>3. Temporary and ‘meanwhile’ use of vacant buildings and sites by start-up businesses as well as creative, cultural and community organisations will be <del>considered</del> <u>supported</u>-particularly where they help activate and revitalise <del>retail</del> centres <u>and can generate increased footfall.</u></p> <p>As an update to the hierarchy of shopping centres as set out in policy CP4 of the City Plan Part One, the secondary frontage of the Regional Centre has been amended to facilitate a new centre called Brunswick Town Local Centre. This centre is shown on the updated Policies Map.</p> <p><sup>1</sup> <u>Within the Lanes area this includes frontages within Market Street, Bartholomews, Meeting House Lane, Nile Street, Brighton Square, Union Street, Ship Street (east), Prince Albert Street, Brighton Place, Hanningtons Lane and Clarence Yard.</u></p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><sup>2</sup> <u>Within the North Laine area this includes frontages within Bond Street, Gardner Street, Church Street, North Road, Kensington Gardens, Sydney Street, Gloucester Street and Trafalgar Street.</u></p>	
PM10	DM12	<p><b>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</b>  <i>Amend Policy DM12 supporting text to read:</i></p> <p><del><b>Review of and designation of shopping frontages</b></del>  <u>2.103 Primary and secondary frontages are defined within the Regional, Town and District Centres of the city in order to assist in the safeguarding and managing of retail uses and related facilities and services.</u></p> <p><u>Policy DM12 supports the City Plan Part One policy CP4 Retail provision and SA2 Central Brighton, as the focus of commercial activity in the centres identified in the Retail Hierarchy of Brighton &amp; Hove. The policy contributes towards maintaining and enhancing the attractiveness of town centres by encouraging more people to use these locations. The main uses encouraged within these ground floor frontages to support footfall will be class E ('commercial, business and service').</u></p> <p><u>Over recent years the increasing importance of internet shopping has changed the focus of shopping in town centres. The Covid-19 pandemic has exacerbated this trend and a change has been seen in primary shopping areas of the city as retail stores have closed and many national companies have downsized or ceased to trade.</u></p>	See commentary for PM9

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>Increasing economic activity within town centres supports high street vitality. The council will therefore be supportive of alternative uses where proposals enhance the vitality and viability of the centre, provide services or sales to visiting members of the public, maintain an active ground floor use and frontages such as commercial window displays and sight of a reception or arrivals area. Where appropriate proposals should be in alignment with the council’s shop front policy DM23. Recognising that our town centres also have a high residential population, the council will ensure that proposals will not have a harmful impact on the amenity of local residents.</u></p> <p><u>Appropriate alternative uses which could contribute to vitality and viability may include sui generis uses such as laundrettes, takeaways, pubs, bars, and cinemas which help generate footfall to an area.</u></p> <p><u>Proposals within the Regional Centre</u></p> <p><u>One of the council priorities is to maintain central Brighton’s role as the city’s vibrant, thriving Regional Centre for shopping, leisure, tourism, cultural, office and commercial uses.</u></p> <p><u>The different but interconnecting shopping areas within the Regional Centre are identified and described in the Retail Study Update 2011. There is active support for the protection of existing and provision of new small unit space, largely catering for local independent traders, located within the Lanes and North Laine areas.</u></p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>The availability of small units provides improved choice for business location and affordability. This in turn provides choice for consumers and this contributes significantly towards maintaining and enhancing the attractiveness and viability. Small units are often more affordable and encourage more specialist or independent retailers. Therefore in order to assist in maintaining the unique/niche/independent retailers in the Lanes and the North Lane as well as the supply of smaller units, changes of use should not result in the amalgamation of three or more adjoining units in order to create a larger unit.</u></p> <p><u>Primary Shopping Area</u></p> <p><u>2.107 In the case of the Regional, Town and District Shopping Centres, the Primary Shopping Area is the extent of the identified primary and secondary frontages. Local Centres tend to be small, therefore they do not have distinctive primary and secondary frontages.</u></p> <p><u>2.104 In 2017 a review was undertaken of the primary and secondary shopping frontages of the current hierarchy of shopping centres in the city. As part of the review some frontage designations have now changed between primary and secondary designation and a new Local Centre in Brunswick Town and some newly identified Important Local</u></p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>Parades have been included within the retail hierarchy. New developments adjacent to shopping frontages have also been designated where it was appropriate to do so. The review's recommendations are now reflected in the updated Policies Map.</u></p> <p><del>2.105 The review indicated that it is appropriate to continue the approach of controlling the amount of class A1 uses and non-A1 uses in each centre. This has proven to be a practical approach in the past and one that allows some flexibility for change of uses within the frontages and an achievement of a good mix of uses.</del></p> <p><del>2.106 For a shopping centre to operate successfully it is necessary for shops to group together. Interruption of retail frontages by non-retail uses, such as a restaurant, pub or estate agent can be complementary to the centre's primary shopping function because they can be considered as providing a local service but, the retail function will be adversely affected if the mix of uses is affected by the dilution of too many A1 units.</del></p> <p><b>Primary Shopping Area</b></p> <p><del>2.107 In the case of the Regional, Town and District Shopping Centres, the Primary Shopping Area is the extent of the identified primary and secondary frontages.</del></p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><b>Primary and Secondary Frontages</b></p> <p>2.108 In the Primary Frontages of each centre a higher percentage of A1 uses is set out in the policy to help to ensure that class A1 acts as the dominant use and core function of the centres and to reinforce the overall vitality and viability. The primary frontage sees the highest levels of activity and footfall; therefore it is also appropriate to locate uses to these areas which enhance the character and attractiveness of the centre as a place to visit.</p> <p>2.109 Within the secondary frontages, a wider mix of uses is supported and consequently a lower minimum threshold for class A1 uses is appropriate. Although these areas do not form part of the primary shopping frontages they do still contribute to the overall vitality and viability of the centre offer. Therefore it would not be appropriate for clusters of non-retail uses to form in these locations either.</p> <p>2.110 The percentage of class A1 uses required in the Regional Centre is the highest, in order to maintain its role as the principle shopping centre in East Sussex, which is of considerable importance to the economic and social life of Brighton and Hove.</p> <p>2.111 In order to assist in maintaining the unique/niche/independent retailers in the Lanes and the North Laine, changes of use should not result in a group of three or more adjoining units being in non-A1 use in order to ensure that there are a range of retail premises to promote and encourage retailers in these areas of the city centre.</p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening									
		<p data-bbox="472 320 1214 528">2.112 Community uses (e.g. doctors and dentists) which would draw people to the centre and may generate combined shopping visits will also be considered to be appropriate town centre uses where they are considered complementary to the town centre, and where they would maintain a window display and draw pedestrian activity into the centre.</p> <p data-bbox="472 571 636 596"><b>Local Centres</b></p> <p data-bbox="472 608 1205 890">2.113 Local centres are small groupings, usually comprising a newsagent and a general grocery store and occasionally a sub post office, pharmacy, a hairdresser and other small shops of a local nature. As local centres tend to be small, they do not have primary and secondary frontages. A threshold of 50% A1 use is stipulated to ensure that these centres remain functional to the communities that they serve in providing top up shopping and local services</p> <p data-bbox="472 933 1182 995"><b>Table 3 – Brighton &amp; Hove’s Retail Hierarchy (adopted City Plan Part 1 Policy CP4 Retail Provision)</b></p> <table border="1" data-bbox="488 1038 1227 1385"> <thead> <tr> <th data-bbox="488 1038 763 1139">Centre Definition</th> <th data-bbox="763 1038 1227 1139">Defined Centres</th> </tr> </thead> <tbody> <tr> <td data-bbox="488 1139 763 1201">Regional Centre</td> <td data-bbox="763 1139 1227 1201">Brighton</td> </tr> <tr> <td data-bbox="488 1201 763 1326" rowspan="2">Town Centres</td> <td data-bbox="763 1201 1227 1264">Hove</td> </tr> <tr> <td data-bbox="763 1264 1227 1326">London Road</td> </tr> <tr> <td data-bbox="488 1326 763 1385">District Centres</td> <td data-bbox="763 1326 1227 1385">St James’s Street</td> </tr> </tbody> </table>	Centre Definition	Defined Centres	Regional Centre	Brighton	Town Centres	Hove	London Road	District Centres	St James’s Street	
Centre Definition	Defined Centres											
Regional Centre	Brighton											
Town Centres	Hove											
	London Road											
District Centres	St James’s Street											

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed		SA screening		
			Lewes Road		DA3, CP4	
			Boundary Road/Station Road		DA8, CP4	
		Local Centres	Mill Lane, Portslade Portland Road, Hove 'The Grenadier', Hangleton Road Richardson Road, Hove Eldred Avenue, Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean		SA6, CP4  (all centres)	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening					
		<table border="1" data-bbox="488 280 763 400"> <tr> <td data-bbox="488 280 763 341"></td> <td data-bbox="763 280 1227 341">Longridge Avenue, Saltdean</td> </tr> <tr> <td data-bbox="488 341 763 400"></td> <td data-bbox="763 341 1227 400">Brunswick Town</td> </tr> </table> <p data-bbox="470 443 1227 1161"><b>Implementation and Monitoring</b>  2.114 <u>The long-term impact of the pandemic on our town centres is not fully known at this stage and therefore it is critical that the Council continues to monitor the impacts in cooperation with other internal teams as well as external organisations.</u> Implementation of the policy will be assisted by continuing to monitor <del>numbers of retail units</del> <u>uses and vacancy levels</u> within defined shopping centres <u>to be reported in the Authority Monitoring Report.</u> <del>The council will use retail survey data, the lawful use and unimplemented extant permissions to help calculate the proportion of units in A1 use. The council's retail survey data will be updated at least bi-annually. The council will report on this in their Authority Monitoring Report. The performance of existing centres will be monitored by the Council. This might result in a centre being moved higher or lower in the hierarchy; an amendment to an existing centre boundary; or, in the larger centres, a change to the defined prime retail frontage within that boundary. Any forthcoming changes will be undertaken in any review of the City Plan Part One.</del></p> <p data-bbox="470 1203 1227 1378">2.115 <del>As part of the development management process, applicants may wish to conduct similar studies themselves to justify that proposals for changes of use would not result in the proportions of A1 units within the primary and secondary frontages falling below the threshold set out in the policy.</del></p>		Longridge Avenue, Saltdean		Brunswick Town		
	Longridge Avenue, Saltdean							
	Brunswick Town							

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><b>Evidence of Marketing</b>  <del>2.116 In demonstrating that marketing for at six months has been carried out, the council will expect the applicant to outline where and how marketing has been undertaken, with details provided to demonstrate that the asking rent has been at a realistic rate, evidence that a prominent advertisement was displayed during the marketing and submitting details of at least three comparable properties for rent. It would be expected that the site has been actively marketed nationally and locally on commercial property websites.</del></p> <p><b>Permitted Development Rights</b>  <del>2.117 Several changes to the Permitted Development Rights affecting change of use to and from retail have been introduced in recent years. Where prior approval is needed, the Council will interpret ‘key shopping areas’ referred to in the General Permitted Development Order as being designated Primary and Secondary Shopping Frontages.</del></p> <p><del>2.118 Ongoing monitoring of the concentration of non-retail uses in shopping centres will be maintained in order to continue to examine the feasibility of implementing Article 4 Directions to remove permitted development rights where shopping areas are showing over-concentrations of particular non A1 uses.</del></p> <p><b>New Development in Centres</b>  2.119 The policy will be applied to new units that are constructed within designated frontages or where they form</p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>a logical extension to an existing frontage. <u>Due to the predominance of larger units in the Primary Frontages, proposals for larger format retail will generally be suited to these defined areas.</u></p> <p>2.120 Residential development contributes to the overall health of centres and to meeting the city’s housing target. There is scope to increase housing stock in the centres, by increasing densities or by introducing housing on upper floors, or to the rear of commercial properties, provided that this does not lead to amenity issues or an unacceptable loss of commercial space and that the commercial uses on the ground floor remain of a viable size <u>to include adequate storage space and staff facilities.</u></p> <p>2.121 From time to time, temporary uses are sought for vacant buildings or cleared sites that are awaiting redevelopment. Although temporary in nature and therefore often lacking the standards of design and finish that would usually be expected from permanent development, such uses can provide jobs and add much to the vitality and vibrancy of an area in the meantime.</p>	
PM11	DM13 page 53	<p><b>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</b> Amend Policy DM13 to read:</p> <p><del>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</del></p> <p><del>A Important Local Parades</del></p>	<p>Proposed changes to DM13 have been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>Due to the changes to the use class order, the policy is no longer able to seek to retain a proportion of certain uses. The policy also no longer provides any protection for uses within neighbourhood parades or individual units located outside designated parades. This is likely to weaken the</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>The following shopping areas are designated as Important Local Parades<sup>1</sup> within the retail hierarchy as shown on the Policies Map;</p> <ul style="list-style-type: none"> <li>• Cowley Drive, Woodingdean</li> <li>• Goldstone Villas, Hove</li> <li>• Hove Park Villas, Hove</li> <li>• Islingword Road, Brighton</li> <li>• Old Shoreham Road/Sackville Road, Hove</li> <li>• Preston Drove, Preston Park</li> <li>• Valley Road, Portslade</li> <li>• Victoria Terrace, Hove</li> <li>• Warren Road, Woodingdean</li> <li>• Woodland Parade, Hove</li> </ul> <p><u>Commercial, business and service uses (E Use Class) will be supported within Important Local Parades.</u></p> <p><u>Proposals for other uses will be permitted where it is demonstrated that the scheme meets the following criteria:</u></p> <ol style="list-style-type: none"> <li>a) <u>The proposal will maintain and enhance the vitality, viability and the character of the Important Local Parade;</u></li> <li>b) <u>The proposal will retain an active ground floor use and frontage and provide a direct service or sales to visiting members of the public;</u></li> <li>c) <u>The proposed development or use(s) will not have a harmful impact on the amenity of local residents, due to noise, odour, disturbance or light pollution; and</u></li> </ol>	<p>policy in relation to certain SA objectives, such as 5 (reducing the need to travel), 15 (access to services) and potentially objectives 16 (health) and 18 (equalities), although the added flexibility have strengthen the policy in relation to SA objective 19 (economy). Full SA assessment of policy DM13 has therefore been undertaken to assess the impacts of this and other changes within the wider context of the policy.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>d) <u>Where appropriate shopfront design should be in accordance with the council's shop front policy (DM23).</u></p> <p>In Important Local Parades, changes of use involving the loss of units in A1 use class, will be permitted where;</p> <ul style="list-style-type: none"> <li>a) <del>The proposal would not result in the number of units in class A1 use falling below 50%; and</del></li> <li>b) <del>The shop unit has been marketed for a minimum of one year;</del></li> </ul> <p>Changes of use at ground floor to residential will be permitted to the rear or on upper floors in Important Local Parades.</p> <p>Temporary and 'meanwhile' use of vacant buildings by start-up businesses as well as creative, cultural and community organisations will be <del>considered</del> supported where they help activate and revitalise <del>retail centres</del> <u>parades and can generate increased footfall.</u></p> <p><del>A) Neighbourhood Parades and Individual Shop Units</del></p> <p><del>Planning permission will be granted for change of use of shops (use classes A1 to A5) to non A1 A5 uses outside of designated centres and Important Local Parades provided that;</del></p> <ul style="list-style-type: none"> <li>a) <del>There are alternative shopping facilities within reasonable walking distance (300 metres);</del></li> <li>b) <del>The shop unit has been marketed for a minimum of one year;</del></li> </ul>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<sup>1</sup> As designated on the Policies Map.	
PM12	Supporting text to Policy DM13, pages 54-55	<p><b>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</b>  <i>Amend Policy DM13 supporting text to read:</i></p> <p>2.121 The term ‘Important Local Parades (ILPs)’ as defined on the Policies Map refers to a group of shops (five or more). ILPS have a key role in contributing to sustainable development, providing access to day-to-day necessities such as a newsagent, convenience store off-licence, pharmacies and post offices, <u>which are easily accessible to people without a car or with restricted mobility within walking distance from home. Access to these local facilities have become more important during the Covid-19 pandemic. Parades complement the local shopping facilities provided in the city’s designated centres and ensure that local convenience shopping facilities are within walking distance to residential areas.</u></p> <p><u>2.### An assessment of 35 shopping parades was undertaken in 2017 and reviewed in 2019 in order to identify areas that could be designated as Important Retail Parades in City. The assessment was set out in the council’s Shopping Frontage Review Paper (April 2020) and its subsequent amendments.</u></p> <p><u>2.### There may be some circumstances where alternative uses will be acceptable such as when they also provide services or sales to visiting members of the public, maintain an active ground floor use and frontages such as commercial window displays and sight of a reception or arrivals area.</u></p>	See commentary for PM11

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>Where appropriate proposals should be in alignment with the council's shop front policy DM23. Recognising that Important Local Parades tend to be in close proximity to residential areas, the council will ensure that proposals will not have a harmful impact on the amenity of local residents.</u></p> <p>2.123 The term 'Neighbourhood Parade' refers to a cluster of three or more units in class A1 use such as a newsagent, convenience store or off-licence, together with A2 uses, for example estate agents or A3, A4 or A5 uses, that function as a group and are capable of serving the convenience needs of a local residential catchment population particularly for older people, people with disabilities and the very young who cannot easily travel far, it is important that convenience retail needs can be met within an easy walking distance within their neighbourhood. In terms of sustainable development, it is important that people are not dependant on use of the car for their day to day retail needs. In areas not close to larger retail centres, parades and isolated shop units provide convenient access to goods and services which are needed on a day to day basis. To support sustainable communities the loss of retail and services will be resisted in under-served areas.</p> <p>2.124 The function of parades has gradually changed over time, and in addition to shops that perform a local shopping function, many parades now provide more specialist retailers (for example, bridal wear or musical instruments) together with a range of non-retail uses such as takeaways. Whilst non-retail uses can provide an important local function, there is risk that the presence of too many can undermine the ability</p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>of the parade to meet local shopping needs and are still anchored by at least one convenience retailer. It is vital, therefore, that each neighbourhood parade continues to offer a good balance of shops and services to support residents' day today needs, whilst providing flexibility to allow for other appropriate uses.</p> <p>2.125 When determining applications for planning permission or prior approval for retail to residential permitted development, the council will not normally permit development resulting in the loss of local retail and service provision unless there is alternative equivalent provision within 300 metres. This is considered a reasonable walking distance (5 minutes for the average person) to access convenience shopping and local services. Provision will be considered equivalent where it provides a similar offer which meets the same need, such as the need for fresh food or a financial service.</p> <p>2.126 Where applications involve the loss of units in A1 use class, the council will require supporting evidence that retail use(s) are no longer economically viable. Applicants will be expected to demonstrate an active marketing campaign for a continuous period of at least a 12 months with evidence submitted showing that a prominent advertisement was displayed during the marketing, whilst the premises was vacant or in 'meanwhile use', which has been shown to be unsuccessful. In addition, for neighbourhood parades and individual retail units where there is no equivalent alternative provision within 400 metres, it will also need to be demonstrated that Use Classes A2, A3 and laundrettes are</p>	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>not viable, before any other uses will be permitted. However, subject to the policy requirements, change of use to a community facility such as a community centre may be permitted where it can be demonstrated there is a need for such provision.</p> <p>2.127 In all cases, demonstration of need must include evidence of consultation with service providers and the local community and an audit of existing provision within the local area.</p> <p>2.128 Brighton and Hove has numerous small local shopping parades and individual shops located in local residential communities. It is important that these shopping facilities remain vibrant, attractive and accessible. Providing local shopping and related facilities within walking distance enables the less mobile, including the elderly and low income groups, access to food and services close to where they live, and is important in achieving equality of opportunity and sustainable neighbourhoods.</p> <p>2.129 From time to time, temporary uses are sought for vacant buildings or cleared sites that are awaiting redevelopment. Although temporary in nature and therefore often lacking the standards of design and finish that would usually be expected from permanent development, such uses can provide jobs and add much to the vitality and vibrancy of an area in the meantime.</p>	
PM13	DM14 page 56	<b>DM14 Commercial and Leisure Uses at Brighton Marina</b> <i>Amend Policy DM14 to read:</i>	Proposed changes to DM14 have been made to reflect changes to the use class order and to align with other

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>Within the Brighton Marina Inner Harbour area<sup>1</sup> commercial, business and service uses (E use class) and local community uses (F2 use class) will be supported.</u></p> <p>In order to <del>maintain and enhance</del> <u>support</u> the <del>special commercial existing commercial</del> and leisure offer within Brighton Marina, changes of use in existing retail/commercial/service frontages will be permitted provided that all of the following criteria are met;</p> <ul style="list-style-type: none"> <li>a) The proposed use would improve the vitality and viability of the Marina, by encouraging combined trips and attracting pedestrian activity; and</li> <li>b) The <del>development</del> <u>proposed use</u> would not be materially detrimental to the amenities of occupiers of nearby properties or the general character of the Marina;</li> <li>c) <del>A window display is provided to retain an active frontage</del> <u>The proposal will retain an active ground floor use and frontage and provide a direct service or sales to visiting members of the public;</u></li> <li>d) <u>The proposed use would not have a harmful impact on amenity due to noise, odour, disturbance or light pollution.</u></li> </ul> <p>A change of use at ground floor level to residential in retail / commercial/ <del>leisure</del> <u>service</u> frontages will not be permitted but may be considered appropriate on upper floors.</p> <p><sup>1</sup> The Brighton Marina Inner Harbour area is a strategic site allocation in the adopted City Plan Part One (DA2.C.1)</p>	<p>policies in relation to this. The SA does not assess the wider implications of changes to the use class order. Changes have also been made to clarify that the policy applies to the Inner Harbour area.</p> <p>The new opening paragraph shows strong support for E and F2 uses and is considered to strengthen the policy in relation to SA objective 15 (access to services) and 19 (employment and economy). Other changes, such as (c) are also considered to contribute towards this. However, the previous SA assessment already found the policy to have significant positive effects for these objectives. The proposed changes to the policy are therefore not considered to change the results of the previous assessment in relation to these objectives.</p> <p>Point (d) strengthens the policy in relation to objective 16 (health), however is not considered to change the results of the previous SA assessment, which already found the policy to have positive effects for this objective.</p> <p>No additional SA assessment of this policy is considered necessary.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM14	Supporting text to Policy DM14, page 56	<p><b><i>DM14 Commercial and Leisure Uses at Brighton Marina</i></b>  <i>Amend supporting text to read:</i></p> <p>2.129 Brighton Marina, functions as an independent component of the city’s urban area. The Marina provides a mix of housing, shopping, commercial, leisure and recreational buildings in addition to <del>being performing as</del> a working harbour. This creates a unique commercial and leisure environment.</p> <p>2.130 The majority of existing retail activity takes place in the Merchant’s Quay /Marina Square, <u>the Waterfront</u> and at the ASDA superstore. Brighton Marina contains a range of bars, restaurants and factory outlet stores related to its wider recreation and leisure role City Plan Part One Policy DA2 (Brighton Marina, Gas Works and Black Rock Area). Brighton Marina is no longer designated as a shopping centre in the retail hierarchy and therefore any proposals for additional retail development not allocated by policy DA2 in City Plan Part One will need to meet the tests of policy CP4 and the National Planning Policy Framework1.</p> <p>2.131 The purpose of this policy is to broaden and strengthen the choice and performance of commercial activity in the Marina by proposing a flexible approach to ensure that its vitality and viability is maintained and enhanced <u>whilst protecting the amenity, public safety and security of existing residents and visitors.</u> <del>Both retail and non-retail uses (including community facilities)</del> <u>Uses</u> should draw additional pedestrian activity to the Marina to strengthen its offer and provide other facilities required to support existing residents</p>	See commentary for PM13

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>and visitors, as well the increased population that will be generated by the proposed additional residential developments. <u>There may be some circumstances where alternative uses will be acceptable, such as when they provide services or sales to visiting members of the public and maintain an active ground floor use and frontages such as commercial window displays and sight of a reception or arrivals area.</u></p> <p><sup>1</sup>National Planning Policy Framework (NPPF) (2019) paragraphs 89-90</p>	
PM15	DM15 page 57	<p><b><i>DM15 Commercial and Leisure Uses on the Seafront</i></b>  <i>Amend Policy DM15 to read:</i></p> <p>Development proposals, including change of use, for new <del>shop</del> <u>retail, food and drink premises (class E (a) &amp; (b)), hot food takeaways, and bars, pubs drinking and nightclubs establishments (A1-A5 Use Class) (sui generis use) and galleries (D1 Use Class-Class F1b) and museums (D2 Use Class Class F1c) will be supported on the lower promenade, Madeira Drive and within the seafront arches, <del>will be permitted</del></u> provided that all of the following criteria are met;</p> <ul style="list-style-type: none"> <li>a) The existing diversity and mix of <del>retail</del> sport, leisure, cultural and recreation uses along the seafront will be retained or enhanced;</li> <li>b) The proposed development is of appropriate scale and design to complement the historic character and setting of the seafront (See City Plan Part One Policies SA1 and CP4);</li> </ul>	<p>Proposed changes to DM15 have been made to reflect changes to the use class order and to future proof the policy in case of changes to legislation. The SA does not assess the wider implications of changes to the use class order.</p> <p>Although the SA commentary under SA objective 15 (access to services) and 19 (economy and employment) for this policy refers to A and D uses, the proposed changes to the policy will not change the result of the actual SA assessment. The previous SA assessment found the policy to have potential for positive effects for objective 15 due to the range of uses supported; and significant positive effects for objective 19 through support for various uses, including temporary uses which can increase footfall and contribute towards seafront regeneration, supporting economic growth. The proposed changes to the policy are not considered to change these effects or results of the previous SA assessment.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>c) The proposal will support the role of the seafront as recreation and tourist destination helping to extend footfall and reduce seasonality; and</p> <p>The proposed development or uses will not have a harmful impact on the amenity of local residents, visitors and the seafront due to noise, odour, disturbance and or light pollution</p>	<p>Deletion of the wording relating to amenity impacts is considered to widen the need to ensure there are no amenity impacts, and is considered to strengthen the policy in relation to SA objective 16 (health) but does not change the previous SA results.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM16	Supporting text to Policy DM15, page 57	<p><b><i>DM15 Commercial and Leisure Uses on the Seafront</i></b> Amend the supporting text to read:</p> <p>2.132 The City’s seafront arches are occupied by a variety of tenants and provide an eclectic offer to visitors and residents alike. The seafront traders occupy the length of the arches loosely by ‘zone’, such as sport, outdoor leisure, artist quarter leisure, restaurants and bars, as well as recreation. Opportunities exist for additional shops and food and drink facilities to cater for visitors from small kiosks to small scale shops, cafes or restaurants in certain areas. There is the potential to enhance the range of uses in order to increase activity in the evening, reduce seasonality and extend footfall along the seafront to the east. Policy CP17 Sports Provision will apply to new sport or leisure proposals.</p> <p>2.133 Any <u>temporary</u> use extending for more than <u>the time allowed under permitted development rights</u> <del>28 days</del> (consecutively or in a single year) requires planning permission. Interim or ‘meanwhile’ uses such as pop-up cafés,</p>	See commentary for PM15

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		performance space/ community uses shops and temporary uses of empty property and land can help to animate and activate vacant buildings/ sites before regeneration or development begins. This can have the benefit of providing an interim income stream whilst also enhancing the attractiveness of a site or location for potential future tenants.	
PM17	Supporting text to Policy DM18, paragraph 2.148 page 64	<p><b><i>DM18 High Quality Design and Places</i></b>  <i>Amend the supporting text at paragraph 2.148 after the third sentence to read:</i></p> <p>The scale of consideration of local context should be commensurate with the scale and impact of the proposals <u>as well as significant and exceptional site constraints</u>. For example, from the street scale in the case of a single dwelling proposal to a neighbourhood, and/or city-wide scale in the case of a larger and/or strategic development.</p>	<p>This proposed change is in the supporting text. It provides further detail in relation to how local context should guide the design of development, linking to bullet point (a) of the policy. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape) through the various policy requirements which should result in a high standard of design, thus protecting the city’s historic built environment and townscapes. The proposed changes add further strength to the policy but are not considered to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM18	Supporting text to Policy DM18, paragraph 2.156 page 66	<p><b><i>DM18 High Quality Design and Places</i></b>  <i>Amend the supporting text at paragraph 2.156 after the first sentence to read:</i></p> <p><u>It refers to providing amenities that allow users to take advantage of the micro-climate conditions, such as sunshine/shade, and are conducive to relaxation, play and social engagement.</u></p>	<p>This proposed change is in the supporting text. It provides further clarity in relation to section d(iv) of the policy regarding elements that support comfort, image and sociability. The previous SA assessment found the policy to have positive effects for objective 16 (health and well-being) through the various policy requirements that should result in good design and the potential for positive impacts on physical and mental-health this can bring. The proposed changes add further strength to the policy but are not</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
			considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.
PM19	Supporting text to Policy DM18, paragraph 2.158 page 66	<p><b><i>DM18 High Quality Design and Places</i></b>  <i>Amend the supporting text at paragraph 2.158:</i></p> <p>Proposals for major applications on strategic or prominent sites or development that is likely to have an impact on public realm will need to demonstrate how an artistic element has been incorporated into development design and how proposals meet the objectives of <u>the council’s Public Art Strategy and relevant art and public realm-related strategies and guidance.</u></p>	This proposed change is in the supporting text. It provides further clarity with regards to relevant council strategies that are a consideration in design. However, the modification is not considered to have any implications for the SA assessment and does not change the results of the previous SA assessment for this policy. No additional SA assessment of this policy is considered necessary.
PM20	Policy DM22 page 73	<p><b><i>DM22 Landscape Design and Trees</i></b>  <i>Add new footnote after the words “national importance” in the second paragraph on page 73:</i></p> <p><i>New footnote to read:</i>  <u>Development of national importance includes, for example, infrastructure projects, where the public benefit would outweigh the loss or deterioration of habitat, as defined by footnote 58 of the NPPF (2019).</u></p>	This proposed footnote adds further clarity to the policy criteria in relation to protected trees, however, does not change the meaning of the policy. The previous SA assessment found the policy to have potential for significant positive effects for objective 1 (biodiversity) and positive effects for objective 4 (open space and green infrastructure) through the policy requirements which should result in the retention, replacement and protection of trees. The proposed changes add further clarity to the policy but are not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.
PM21	Supporting text to Policy	<p><b><i>DM22 Landscape Design and Trees</i></b>  <i>Amend paragraph 2.177, after fifth sentence to read:</i></p>	This proposed change is in the supporting text. It provides further detail in relation to sourcing tree stock, which would contribute towards improving biosecurity. The previous SA

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	DM22 para. 2.177 page 74	Native species will be encouraged in particular those of local origin subject to climate change adaptability. <u>Tree stock sourced from the UK or Ireland, and locally sourced seeds is encouraged.</u>	assessment found the policy to have potential for significant positive effects for objective 1 (biodiversity). The proposed changes add further strength to the policy in relation to this SA objective but are not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.
PM22	Supporting text to DM22 para. 2.178 page 74	<b><i>DM22 Landscape Design and Trees</i></b> <i>Amend paragraph 2.178 to read:</i>  2.178 <u>Existing landscape features can be used more effectively if they have multi-functional uses. For example, natural landscape design features can provide opportunities for informal play or sports; productive plants that form part of the landscape design can provide opportunities for food growing. Provision of food growing opportunities should have regard to the Food Growing Planning Advice Note. Effective landscaping will be required...</u>	This proposed change is in the supporting text. It provides further detail in relation effective use of landscaping and the various opportunities it provides, linking to bullet point (g) of the policy. The previous SA assessment found the policy to have potential for positive effects for objective 13 (making the best use of land) through policy requirements which require effective/multi-functional uses within landscape design and significant positive effects for objective 16 (health) through the potential benefits for health through facilitating active lifestyles and interaction. The proposed changes add further strength to the policy in relation to these SA objectives but are not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.
PM23	Supporting text to Policy DM22 para. 2.184 page 76	<b><i>DM22 Landscape Design and Trees</i></b> <i>Amend penultimate sentence of paragraph 2.184 to read:</i>  If trees are (or will become) owned or maintained by the council then, alongside maintenance plans, applicants will be expected to provide adequate funding to manage additional maintenance that is foreseeable as a result of development <u>in consultation with City Parks and in accordance with Policy CP7 Developer Contributions.</u>	This proposed change is in the supporting text. It provides further clarity in relation to securing funding for maintenance for new trees. However, the modification is not considered to have any implications for the SA assessment and does not change the results of the previous SA assessment for this policy. No additional SA assessment of this policy is considered necessary.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM24	Supporting text to Policy DM29, para. 2.227 page 89	<p><b>DM29 The Setting of Heritage Assets</b>  <i>Amend first sentence of paragraph to read:</i></p> <p>2.227 <u>Reference to scale in the policy includes height.</u>            Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, will often overlap with considerations <del>both</del> of townscape/urban design and of the character and appearance of conservation areas. This policy does not <del>therefore</del> preclude a bold architectural approach where Appropriate.</p>	<p>This proposed change is in the supporting text. It provides further clarity in relation to scale of development, linking to the first paragraph of the policy. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape) through requirements which should ensure the positive integration of new development into the historic environment. The proposed changes add further strength to the policy in relation to this SA objective but are not considered to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM25	Policy DM30, page 91	<p><b>DM30 Registered Parks and Gardens</b>  <i>Amend second sentence of first paragraph of policy to read:</i></p> <p>In assessing <u>the impact of such proposals on the significance of the park or garden</u> <del>this</del>, the council will have particular regard to the impact <del>of development</del> on any notable view of, within or across the park or garden.</p>	<p>The proposed change is to the main policy text, adding further clarity to how impacts will be considered in relation to the Park or Garden. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape) through requirements which should ensure the preservation of Registered Parks &amp; Gardens and positive integration of new development into the historic environment. The proposed changes add further strength to the policy in relation to this SA objective but are not considered to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM26	Policy DM30, page 91	<p><b>DM30 Registered Parks and Gardens</b>  <i>Amend first sentence of second paragraph of policy to read:</i></p>	<p>The proposed change is to the main policy text, and further clarifies that permission for temporary events is to be considered an exception and any harm clearly minor in nature. The previous SA assessment found the policy to have</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><del>As an exception to the above, and w</del>Where permission is required, temporary uses or events (including associated structures) may <u>exceptionally</u> be permitted where any harm caused would be strictly temporary, <u>clearly</u> minor and easily reversible, having regard to the significance of the site within the park and garden, the scale of impact, timing and any public benefits arising from the use or event.</p>	<p>potential for significant positive effects for objective 4 (heritage and townscape) through requirements which should ensure the preservation of Registered Parks &amp; Gardens including through requirements for temporary uses. The proposed changes add further strength to the policy in relation to this SA objective but are not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.</p>
PM27	Supporting Text to Policy DM30, paragraph 2.235 page 91	<p><b><i>DM30 Registered Parks and Gardens</i></b>  <i>Amend paragraph 2.235 by adding new second sentence to read:</i></p> <p><u>All applications will be expected to include evidence to show what alternative sites have been considered and why they are not deemed suitable.</u></p>	<p>The proposed change is to the supporting text, and sets out the requirement for applications for temporary uses to have considered alternative sites. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape) through requirements which should ensure the preservation of Registered Parks &amp; Gardens including through requirements for temporary uses. The proposed changes add further strength to the policy in relation to this SA objective but are not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary</p>
PM28	Policy DM31 page 93	<p><b><i>DM31 Archaeological Interest</i></b>  <i>Amend first sentence of fourth paragraph of policy to read:</i></p> <p>Where the council has reason to believe, either from the archaeological assessment or from other evidence sources, that significant archaeological remains may exist, a suitable field evaluation and/or survey (e.g. for standing buildings and structures) will be required <u>pre-determination</u>.</p>	<p>The proposed change is not considered to have any SA implications.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM29	Policy DM32, page 95	<p><b>Policy DM32 The Royal Pavilion Estate</b>  <i>Amend criterion d) of part 1 of the policy to read:</i></p> <p>d) <del>Transform</del> <u>Enhance</u> the quality and infrastructure of the gardens <u>as previously restored</u> and enable the <u>better</u> management of activities within them;</p>	<p>The proposed changes are to the main policy text. The change in wording from “transform” to “enhance” recognises the positive restoration work undertaken and the need to enhance that scheme rather than change it. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape) through requirements which should improve the Royal Pavilion Estate. The proposed changes add further strength to the policy in relation to this SA objective but are not considered to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary</p>
PM30	Supporting text to Policy DM32, paragraph 2.245 page 96	<p><b>Policy DM32 the Royal Pavilion Estate</b>  <i>Amend second sentence of paragraph 2.245 to read:</i></p> <p><del>This should include improving the infrastructure within the gardens,</del> <u>Whilst the gardens were positively restored in the late 20<sup>th</sup> century, opportunity should be taken to enhance that scheme</u> <del>such as</del> with, for example, protective fencing, better paths and lighting levels, improved irrigation and waste disposal and better facilities for the gardening staff.</p>	See commentary for PM29
PM31	Supporting text to Policy DM32, paragraph 2.246 page 96	<p><b>Policy DM32 the Royal Pavilion Estate</b>  <i>Amend by adding a new third sentence and amending the fourth sentence of 2.246 to read:</i></p> <p><u>The garden's historic interest is in part its use as a promenading garden and place for reflection. The impact</u>  <u>Impacts</u> on public views and</p>	<p>The proposed changes are to the supporting text and clarify the Royal Pavilion Estate’s historic interest. However, the proposed change is not considered to have any implications for the SA assessment and does not change the results of the previous SA assessment for this policy.</p> <p>No additional SA assessment of this policy is considered necessary.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		access will <u>also</u> form <u>a</u> <u>key</u> part of <del>this</del> considerations.	
PM32	Policy DM33	<p><b><i>Policy DM33 Safe, Sustainable and Active Travel</i></b>  <i>Amend part 4(c):</i></p> <p>c) Do not prejudice the implementation of proposed road safety improvements set out in the Local Transport Plan (and subsequent revisions/successor documents or programmes) <del>and the council's Road Safety/Safer Roads Strategy;</del> and</p>	The proposed change is a factual update as Road Safety Strategy has expired. It has no implications on the SA or the findings of the previous SA assessments.
PM33	Supporting text to Policy DM33, paragraph 2.253 page 100	<p><b><i>Policy DM33 Safe, Sustainable and Active Travel</i></b>  <i>Add sentence to end of paragraph 2.253:</i></p> <p><u>In providing new infrastructure for cycling and walking, applicants should also take account of national guidance in 'Cycle Infrastructure Design (Local Transport Note 1/20)' and 'Gear Change; A bold vision for cycling and walking', in addition to the council's Local Cycling and Walking Infrastructure Plan.</u></p>	This proposed change provides further guidance but is not considered to have any SA implications.
PM34	Policy DM36, criterion 2	<p><b><i>Policy DM36 Parking and Servicing</i></b>  <i>Amend policy introduction and criterion 2 to read:</i></p> <p>Provision of parking, including 'blue badge' holder and cycle parking, in new developments should follow the standards in SPD14 'Parking Standards for New Development' <del>(and any subsequent revisions)</del> as set out in Appendix 2. In addition:</p> <p>2) Car-free residential developments will be supported and encouraged subject to consideration of relevant factors as set out in SPD14 'Parking Standards for New Development' <del>(and any subsequent revisions).</del></p>	This proposed change is to ensure legal compliance. It has no implications on the SA or the findings of the previous SA assessments.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM35	Policy DM36 Paragraph 2.266	<p><b>Policy DM36 Parking and Servicing</b>  <i>Amend paragraph 2.266 to read</i></p> <p>“...The guidance in the SPD on parking levels is now transposed into policy and is set out in full in Appendix 2. This reflects local circumstances and aims to strike the right balance between providing appropriate levels of car parking spaces whilst also promoting sustainable forms of transport in areas of good public transport accessibility. <del>Any future revisions to these standards will replace those currently set out in the Appendix 2.</del>”</p>	This proposed change is to ensure legal compliance. It has no implications on the SA or the findings of the previous SA assessments.
PM36	Policy DM36 Paragraph 2.268	<p><b>Policy DM36 Parking and Servicing</b>  <i>Amend paragraph 2.268 to read:</i></p> <p>“In locations where it cannot be demonstrated that on-street parking capacity would be sufficient to accommodate overspill, the council may <u>use Traffic Regulation Orders</u> <del>add conditions to planning permissions</del> to ensure that developments are ‘permit free’, i.e. that future occupants of a development are not eligible to apply for council-issued on-street parking permits.”</p>	This proposed change is made to reflect practice. It has no implications on the SA or it’s the findings of the previous SA assessments.
PM37	Policy DM37 page 110	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend first paragraph in Nature Conservation section of policy to read:</i></p> <p><u>Development should avoid adverse impacts and All development should seek to conserve and enhance biodiversity and geodiversity features ensuring:</u></p>	Although the proposed changes are unlikely to change the findings of the previous SA assessment, particularly in relation to relevant objectives 1 (biodiversity) and 3 (open space and green infrastructure), full SA assessment of policy DM37 has been undertaken due to the extensive nature and range of changes proposed.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM38	Policy DM37 page 110	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend bullet point list in Nature Conservation Section of policy to read:</i></p> <ul style="list-style-type: none"> <li>• <u>accordance with the mitigation hierarchy</u> (<i>link to footnote</i>)</li> <li>• <u>an additional</u> net gain in biodiversity is achieved;</li> </ul>	See commentary for PM37
PM39	Policy DM37 page 110	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend bullet point list in Nature Conservation Section of policy to read:</i></p> <ul style="list-style-type: none"> <li>• that recognised <u>protected and notable</u> <del>priority</del> species and habitats are protected and supported;</li> </ul>	See commentary for PM37
PM40	Policy DM37 page 110 Footnote 67	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Amend footnote 67 to read:</p> <p>Nature recovery networks allows opportunities for <u>protection and</u> enhancement of existing nature assets including protected sites and wildlife-rich habitats, <u>and creation of new habitats</u>, to be identified and prioritised within a local area.</p>	See commentary for PM37
PM41	Policy DM37 page 111	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend first paragraph of policy on page 111 that follows bullet point list to read:</i></p> <p><del>Proposals for development within a designated site of importance to nature conservation or which could impact upon a designated site</del> must <u>also</u> satisfy the following criteria:</p>	See commentary for PM37
PM42	Policy DM37	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b></p>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	page 111	<p><i>Amend policy at Part A. Internationally protected sites to read:</i></p> <p><u>All development must comply with the Conservation of Habitats and Species Regulations (as amended) * (link to new footnote).</u> Development likely to have significant effects on an international site (either individually or in combination with other plans or projects) and which would affect the integrity of the site <del>will be subject to Habitat Regulations Assessment and</del> will not be permitted unless the council is satisfied that:</p> <ul style="list-style-type: none"> <li>i) There is no alternative solution (which can be adequately demonstrated by the developer); <u>and</u></li> <li>ii) There are imperative reasons of overriding public health or public safety for the development; and</li> <li>iii) Adequate <u>mitigation measures and/or</u> compensatory provision is secured.</li> </ul> <p><i>New footnote to read:</i>  <u>The Conservation of Habitats and Species Regulations 2017 (as amended).</u></p>	
PM43	Policy DM37 page 111	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Amend policy at Part B. Nationally protected sites to read:</i></p> <p>Development proposals should avoid impacts on nationally protected sites*<i>(link to new footnote)</i>. Development proposals likely to have an adverse effect on the site's notified special interest features will not be permitted unless:</p> <ul style="list-style-type: none"> <li>i) the benefits of the development, at this site, clearly outweigh <u>both</u> the likely impact to notified features on the site and any broader impacts on the network of nationally protected sites; and</li> </ul>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>ii) <del>the loss impacts</del> can be mitigated <u>in accordance with the mitigation hierarchy; and through on or off site habitat creation to achieve a net gain in biodiversity/ geodiversity.</u></p> <p>iii) <u>on or off site additional measurable net gains in biodiversity/geodiversity can be achieved.</u></p>	
PM44	Policy DM37 page 112	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Amend policy at Part C. Locally protected sites to read:</i></p> <p><del>Unless allocated for development in the City Plan, d</del>  <u>Development proposals that will result in an adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will not be permitted, unless*(link to new footnote):</u></p> <p>i) <u>the site is allocated for development in the City Plan or there are exceptional circumstances that justify the development of the site and can be demonstrated to outweighing the adverse effects on the local designation are clearly demonstrated;</u> and</p> <p>ii) <del>the loss impacts</del> can be mitigated through on or off-site habitat creation; <del>and to achieve a net gain in biodiversity/geodiversity.</del></p> <p>iii) <u>on or off site additional measurable net gains in biodiversity/geodiversity can be achieved.</u></p>	See commentary for PM37
PM45	Policy DM37 page 112	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Move and amend the following section of the final paragraph from page 112 to follow the bullet point list on page 111. Paragraph reads:</i></p> <p>Proposals liable to affect green infrastructure and nature conservation features either directly or indirectly must be</p>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		supported by an appropriate and detailed site investigation/assessment and accord with provisions set out in the mitigation hierarchy <sup>71</sup> . Measures to avoid or prevent harmful effects will be required.	
PM46	Policy DM37 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Move and amend the following section of the final paragraph from page 112 to follow the new proposed section heading entitled “Designated Sites” on page 111 and prior to existing paragraph that reads “Proposals for development within a designated site of importance to nature conservation...”</i></p> <p><i>Paragraph to read:</i>  Where proposals are liable to cause direct or indirect harm to a designated site, they must provide:</p> <ul style="list-style-type: none"> <li>a) evidence to demonstrate that the objectives of the designation and integrity of the area will not be undermined;</li> <li>b) funded management plans that secure the long term protection and enhancement of remaining features<sup>72</sup>; and</li> <li>c) up-to-date information about the biodiversity/geodiversity which may be affected, and how <del>loss impacts</del> can be mitigated <del>to achieve</del> <u>and additional measurable net gains achieved.</u></li> </ul>	See commentary for PM37
PM47	Supporting text to Policy DM37 paragraph 2.278 page 114	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend seventh sentence of paragraph 2.278 to read:</i></p> <p>The opportunity for nature recovery networks should be considered in accordance with the emerging Nature Capital Investment Strategy for Sussex and future Local Nature</p>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		Recovery Strategies, <u>which will become a requirement under the forthcoming Environment Act.</u>	
PM48	Supporting text to Policy DM37 paragraph 2.279 page 114	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Amend paragraph 2.279 to read:</i></p> <p>The council will continue to work with the Brighton and Lewes Downs UNESCO Biosphere partners, including the South Downs National Park Authority and other surrounding authorities, to secure a landscape scale approach to biodiversity and green infrastructure <u>as recommended by People and Nature Network (PANN) 2020, which builds upon the Sussex Natural Capital Investment Strategy.</u></p>	See commentary for PM37
PM49	Supporting text to Policy DM37 paragraph 2.281 page 115	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Amend fourth sentence of paragraph 2.281 to read:</i></p> <p>All new build, refurbishment, and renovation schemes should incorporate swift boxes and bee bricks where possible ensuring their installation follows best practice guidance <u>including local guidance set out in the Guidance Note for Provision of Swift Boxes in New Development, 2020.</u></p>	See commentary for PM37
PM50	Supporting text to Policy DM37 paragraph 2.282 page 115	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Add sentence to end of paragraph 2.282 to read:</i></p> <p><u>Nature-based solutions to carbon storage and sequestration should also be sought.</u></p>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM51	Supporting text to Policy DM37 page 115	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Add new paragraph after existing paragraph 2.282. New paragraph to read:</i></p> <p><u>In addition to any measures required to mitigate impacts, net gains in biodiversity should also be achieved. Biodiversity net gain should be delivered on site where possible, or off site as appropriate and should still be secured where proposals have negligible or no adverse impacts on biodiversity. The Sussex Local Nature Partnership (LNP) has an ambition to achieve a 20% target for biodiversity net gain from developments. The council will work with the LNP to bring forward evidence to support this target. The updated SPD will also address biodiversity net gain and include examples of achievable targets.</u></p>	See commentary for PM37
PM52	Supporting text to Policy DM37 page 115	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Add new supporting text paragraph prior to the section entitled "Designated Sites" and new footnote to read:</i></p> <p><u>In relation to Part C of the policy, examples of exceptional circumstances include development required in relation to flood defences or coastal management, key infrastructure that meets the wider needs of the city, and transport related infrastructure. Where land within locally designated sites is subject to an allocation for development in the City Plan* (new footnote), it is considered that the exceptional circumstances required under section C i) of the policy have been demonstrated specifically through the examination and adoption of the City Plan Part One and the need to plan positively for housing within the context of a significant citywide housing shortfall. However, any development</u></p>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>proposals on these sites will still be required to meet the requirements under section C ii) and C iii) for mitigation and net gain in biodiversity/geodiversity as well as requirements relating to ecological assessment.</u></p> <p><i>Footnote to read:</i>  <u>This applies to a small number of housing sites allocated in Policy H2 and one site allocated in Policy H1.</u></p>	
PM53	Supporting text to Policy DM37 paragraph 2.283 page 115	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Amend paragraph 2.283 to read:</i></p> <p>However, Castle Hill is designated a Special Area of Conservation (SAC) and lies within the South Downs National Park and the administrative area of the city council and <u>there are several designated European sites (SPAs and SACs) elsewhere within East and West Sussex. Large-scale development within the City Plan area may still detrimentally affect the SAC by reason of additional pressure from visitors and traffic. As part of the preparation of City Plan Part Two, the council has undertaken a Habitats Regulations Assessment which concluded that the development proposed in the plan will not have significant adverse impacts on any designated European sites within 20km of the plan area boundary.</u></p>	See commentary for PM37
PM54	Supporting text to Policy DM37 paragraph	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b>  <i>Add new sentence at end of paragraph 2.284 to read:</i></p> <p><u>National sites also include Marine Conservation Zones (MCZ), designated through the Marine and Coastal Access Act 2009.</u></p>	See commentary for PM37

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	2.284 page 115	<u>The Beachy Head West MCZ lies partly within the City Plan area.</u>	
PM55	Policy DM39 page 119	<p><b><i>Policy DM39 Development on the Seafront</i></b>  <i>Amend last paragraph of policy to read:</i></p> <p>All developments providing sea-based activities or with a potential impact upon the marine environment should <del>have appropriate regard to the Beachy Head West Marine Conservation Zone and</del> be in accordance with the South Marine Plans. <u>Development that would be likely to have an adverse impact on designated sites including the Beachy Head West Marine Conservation Zone will need to accord with DM37 Green Infrastructure and Nature Conservation.</u></p>	<p>The proposed change is to the main policy text and highlights the link between the policy and DM37 in relation to the designated Marine Conservation Zone. The previous SA assessment found the policy to have potential for positive effects for objective 1 (biodiversity) through the various requirements including reference to the MCZ. The proposed modification adds further strength to the policy in relation to this SA objective but is not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary</p>
PM56	Supporting text to Policy DM39 paragraph 2.300 page 120	<p><b><i>Policy DM39 Development on the Seafront</i></b>  <i>Amend Supporting text at end of sentence at paragraph 2.30 to read:</i></p> <p>The council will seek to ensure that any new or enhanced sea defences integrate sensitively with the local environment <del>and</del> <u>avoid an adverse impact on nature conservation assets in accordance with Policy DM37 Green Infrastructure and Nature Conservation.</u></p>	<p>The proposed changes are to the supporting text and clarify that adverse effects on sites of nature conservation interest should be avoided to ensure consistency with DM37. The previous SA assessment found the policy to have potential for positive effects for objective 1 (biodiversity) through the reference for coastal habitats to be protected and enhanced. This proposed change adds further strength to the policy in relation to this SA objective, through the clear direction to avoid impacts, however, is not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.</p>
PM57	Policy DM40 Page 123	<p><b><i>DM40 Protection of the Environment and Health – Pollution and Nuisance</i></b>  <i>Amend criteria (g) to read:</i></p>	<p>The proposed change is to the main policy text. Deletion of the word outdoor will allow for the consideration of indoor lighting as well as outdoor lighting and the potential</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>g) ensure <del>outdoor</del> 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 <u>health</u>, public &amp; highway safety, biodiversity, in particular priority habitats and species, the night sky and the South Downs National Park International Dark Sky Reserve.</p>	<p>detrimental impacts light pollution can have, which now includes health.</p> <p>The previous SA assessment found the policy to have potential for positive effects for objective 1 (biodiversity) through the various policy requirements which should ensure that pollution (including light pollution) does not have detrimental impacts on biodiversity; objective 3 (protect SDNP), specifically through the requirements for lighting to avoid detrimental impacts on the SDNP Dark Skies Reserve; and on objective 16 (health) through the various policy requirements which should ensure development does not give rise to any forms of pollution that could be detrimental to health. Although the commentary for objective 16 does not specifically refer to the impacts of lighting on health, the proposed modification is not considered to change the results of the previous SA assessment. Overall, the proposed changes add further strength to the policy in relation to all these SA objectives, however, is not considered to change the results. No additional SA assessment of this policy is considered necessary.</p>
PM58	Supporting text to Policy DM40 paragraph 2.314 page 125	<p><b><i>DM40 Protection of the Environment and Health – Pollution and Nuisance</i></b></p> <p><i>Amend supporting text paragraph 2.134 as follows:</i>  <u>2.314 Criteria g applies to any proposals which involve the installation of external lighting and where the design of developments may result in light spill from internal lighting.</u>  Development proposals should avoid excessive and unnecessary lighting <u>to limit the potential for impacts on</u></p>	See commentary for PM57

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>human health and biodiversity, whilst at the same time recognising the important role of lighting in optimising the effective use of land outside daylight hours and addressing crime and antisocial behaviour (such as floodlighting for the extension of operating hours/crime deterrent). <u>Lighting design should have regard to the Institute of Lighting Professionals (ILP) Guidance Note 1 for the Reduction of Obtrusive Light (2020)</u>. In May 2016 the South Downs National Park was designated as an International Dark Sky Reserve (IDSR). Lighting within the setting of the National Park should therefore take particular care to avoid unnecessary direct or reflected illumination of the sky at night.</p>	
PM59	Policy DM44 Page 134	<p><b><i>DM44 Energy Efficiency and Renewables</i></b>  <i>Amend part one of Policy to read:</i></p> <p>1. All development including conversions and change of use of existing buildings to achieve at least 19% improvement on the carbon emission targets set by Part L (2013) until the Future Homes Standard and the Future Buildings Standard or any interim uplift in Part L which exceeds 19% improvement come into effect unless superseded by national policy or legislation;<sup>100</sup></p>	<p>This proposed change to policy text future proofs the policy in relation to the introduction of the Future Homes and Future Buildings standards and will ensure that any increased targets will supersede the current 19% target. The previous SA assessment found the policy to have potential for significant positive effects for objective 9 (reducing greenhouse gas emissions) through the various policy requirements which should result in improvements to energy efficiency and less carbon emissions. The proposed change adds further strength to the policy in relation to this SA objective, however, is not considered to change the results. No additional SA assessment of this policy is considered necessary.</p>
PM60	Policy DM44 Page 134	<p><b><i>DM44 Energy Efficiency and Renewables</i></b>  <i>Amend part footnote 100 to read:</i></p>	See commentary for PM59

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>100 <del>Including changes to Part L of the Building Regulations or the approved calculation methodology.</del> <u>Following consultation, the government has indicated in its response to the Future Homes Standard consultation (The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings, January 2021) that it will introduce a Future Homes Standard and a Future Buildings Standard for non-domestic buildings in 2025 and an interim uplift to Part L will come into effect in June 2022.</u></p>	
PM61	Policy DM44 Page 134	<p><b><i>DM44 Energy Efficiency and Renewables</i></b>  <i>Amend first sentence of last paragraph of policy to read:</i></p> <p>All development will be expected to submit an energy statement to provide details of the <u>building fabric energy efficiency and low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO2 savings that will be achieved.</u></p>	<p>This is a proposed change to the supporting text. It further clarifies that fabric efficiency measures form part of the energy statement.</p> <p>The proposed change adds further strength to the policy in relation to SA objective 9 (reducing greenhouse gas emission) however, is not considered to change the results. No additional SA assessment of this policy is considered necessary.</p>
PM62	Supporting text to Policy DM44 para. 2.345 Page 137	<p><b><i>DM44 Energy Efficiency and Renewables</i></b>  <i>Amend paragraph 2.345 of supporting text to read:</i></p> <p>To ensure the assessment of new development better reflects the actual carbon emissions associated with their expected operation, planning applicants are required to use the government's updated carbon emission factors (SAP 10.1 or subsequent <del>versions</del> <u>updates</u>). It is anticipated that on developments where carbon savings from certain technologies (e.g. gas-engine CHP and solar PV) do not <del>achieve the carbon savings set out in</del> <u>meet</u> City Plan Part One Policy CP8, <u>fabric energy efficiency measures and alternative</u></p>	<p>This is a proposed change to the supporting text. It further clarifies the current version of SAP assessments and clarifies that fabric efficiency measures should form part of overall strategy to improve energy efficiency and reduce carbon emissions.</p> <p>The proposed change adds further strength to the policy in relation to SA objective 9, (reducing greenhouse gas emission) however, is not considered to change the results. No additional SA assessment of this policy is considered necessary.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		or additional technologies will need to be utilised to meet the 19% improvement against part L <u>2013</u> .	
PM63	Supporting text to Supporting text to Policy DM44 page 137	<p><b>DM44 Energy Efficiency and Renewables</b>  <i>Add new paragraph after the supporting text in paragraph 2.345 to read:</i></p> <p><i>New paragraph: <u>The government indicated in January 2021* its intention to introduce the Future Homes Standard and Future Buildings Standards in 2025 with interim uplifts to Part L anticipated to come into effect in June 2022. For new homes, the interim uplift in Part L will be expected to produce 31% less CO2 emissions compared to current standards. The 19% improvement against part L 2013 will continue to apply until superseded by 2025 standards or any interim uplifts in Part L brought into effect before 2025 if these are higher than the 19%. In order for the city to achieve greater reductions in CO2 emissions and to meet the council’s aspiration to become a carbon neutral city by 2030 the council will encourage developers to work towards the interim uplift in Part L before it comes into effect.</u></i></p> <p><i>*Add new footnote: <u>The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings, January 2021.</u></i></p>	See commentary for PM59
PM64	Supporting text to Policy DM44 paragraph 2.346 page 137	<p><b>DM44 Energy Efficiency and Renewables</b>  <i>Amend first sentence of paragraph 2.346 of supporting text to read:</i></p> <p>2.346 If a developer can demonstrate that there is a technical or financial reason why <del>this</del> <u>the 19% improvement against</u></p>	This is a proposed change to the supporting text. It further clarifies the relevant target. This is not considered to have any SA implications. No additional SA assessment of this policy is considered necessary.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		Part L 2013 target cannot be achieved they would be expected to deliver as close to this target as possible.	
PM65	Supporting text to Policy DM44 paragraph 2.359 page 137	<p><b>DM44 Energy Efficiency and Renewables</b>  <i>Amend last sentence of paragraph 2.359 of supporting text to read:</i></p> <p>The council will expect ‘as built’ reports for non-domestic developments to demonstrate compliance to Policy CP8 BREEAM standards, ie: <u>most developments should meet BREEAM UK New Construction assessment</u>; shell only developments should meet BREEAM UK New Construction ‘Shell only’ assessment; and refurbishment and fit-out should meet BREEAM UK Refurbishment and Fit- out Parts 2, 3 or 4 assessments as appropriate.</p>	This is a proposed change to the supporting text. It further clarifies the relevant BREEAM scheme that will be applicable. This is not considered to have any SA implications. No additional SA assessment of this policy is considered necessary.
PM66	Policy SSA1, page 153	<p><b>SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road</b>  <i>Amend Policy to read:</i></p> <ul style="list-style-type: none"> <li>• 10,000 – 12,000 sq m health and care facility (<del>D1</del><u>E(e)</u>);</li> </ul>	<p>The proposed change to SSA1 has been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>The SA commentary under SA objective 15 (access to services) refers to positive impacts resulting from the policy due to the health and care facilities required to be provided. The change from D1 to Ee is not considered to change the effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM67	Policy SSA2, page 156	<p><b>SSA2 Combined Engineering Depot, New England Road</b>  <i>Amend policy at first paragraph second bullet point policy to read:</i></p>	The proposed change to SSA2 has been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		the provision/replacement of a minimum of 1,000 sq m <del>B1</del> <u>E(g)</u> workspace and managed starter office units.	<p>Although the SA commentary under SA objective 19 (economy and employment) for this policy refers to B1 uses, the changes to the policy will not change the result of the actual SA assessment. The previous SA assessment found the policy to have potential for significant positive effects for this objective through the requirement to provide employment floorspace, thus contributing towards employment opportunities and economic growth. The proposed changes to the policy are not considered to change these effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM68	Policy SSA3, page 158	<p><b><i>SSA3 Land at Lyon Close, Hove</i></b>  <i>Amend policy to read:</i></p> <p><i>(Second paragraph, first bullet point)</i></p> <ul style="list-style-type: none"> <li>• the retention/ replacement of a minimum of 5,700 sq m net <del>B1a</del> <u>E(g)</u> office floorspace through the mixed use development of the following sites:</li> </ul> <p><i>(Second paragraph, third bullet point)</i></p> <ul style="list-style-type: none"> <li>• expanded <del>D1</del> health facilities (GP surgery) and/or community uses subject to demonstration of need and deliverability; and</li> </ul> <p><i>(Third paragraph)</i>  Should the retail warehouse units<sup>134</sup> come forward for redevelopment during the Plan period then the council will seek a mix of <del>B1</del> <u>E(g)</u> business and residential uses.</p>	<p>All the proposed changes to SSA3 have been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>Although the SA commentary under SA objective 19 (economy and employment) for this policy refers to B1 uses, the changes to the policy will not change the result of the actual SA assessment. The previous SA assessment found the policy to have potential for positive effects for this objective through delivery of new or retained business floorspace contributing towards employment opportunities and economic growth.</p> <p>Although the SA commentary under SA objective 15 (access to services) for this policy refers to D1 uses, the changes to the policy will not change the result of the actual SA assessment. The previous SA assessment found the policy to</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><i>(Fourth paragraph, criterion b.)</i></p> <p>All proposals, including changes in existing business uses (<del>Use Class B1-B8</del>) (Use Classes E(g), B2 and B8), will be expected to contribute to the provision of a range of office and flexible workspaces including medium floor plate offices and start up business floorspace suitable for small business;</p>	<p>have potential for significant positive effects for this objective through expansion of services and other community uses.</p> <p>The proposed changes to the policy are not considered to change these effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM69	Policy SSA4, page 161	<p><b>SSA4 Sackville Trading Estate and Coal Yard</b>  <i>Amend policy first paragraph, second bullet point to read:</i></p> <ul style="list-style-type: none"> <li>• A minimum of 6000m2 <del>E(g)B1</del>-employment floorspace</li> </ul>	<p>This proposed change to SSA4 has been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>Although the SA commentary under SA objective 19 (economy and employment) for this policy refers to B1 uses, the changes to the policy will not change the result of the actual SA assessment. The previous SA assessment found the policy to have potential for significant positive effects for this objective through delivery of new business floorspace contributing towards employment opportunities and economic growth.</p> <p>The proposed modification to the policy is not considered to change these effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM70	Policy SSA4 Page 162	<p><b>SSA4 Sackville Trading Estate and Coal Yard</b>  <i>Add criterion (k) to policy to read:</i></p>	<p>This proposed change to policy text requires protection of the groundwater resources.</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><u>k) Development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u></p>	<p>The previous SA assessment found the policy to have potential for positive effects for objective 7 (improve water quality) through existing references in the supporting text to protecting the groundwater resource. The proposed change to the policy is considered to strengthen the policy in relation to this objective but is not considered to change these effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM71	Policy SSA5, page 164	<p><b><i>SSA5 Madeira Terrace and Madeira Drive</i></b>  <i>Amend Policy SSA5 to read:</i></p> <ul style="list-style-type: none"> <li>• Retail uses (Use Classes <del>A1, A3, A4, A5</del> <u>E (a), E (b), Public house, wine bar, or drinking establishment (Sui Generis) and hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises (Sui Generis)</u>);</li> <li>• Commercial space (Use Class <del>B1-E</del> <u>(g)</u>);</li> <li>• Small <u>scale/ boutique hotel visitor accommodation</u> (Use Class C1);</li> <li>• Galleries/museum(s) (Use Classes <del>D1</del> <u>F1 (b) and F1(c)</u>); and/or</li> <li>• Leisure uses (Use Classes <del>D2</del> <u>E (d) and F2</u>) appropriate to the character of the seafront.</li> </ul>	<p>These proposed changes to SSA5 have been made to clarify that only small scale visitor accommodation will be supported and to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>The clarification that small scale visitor accommodation could have positive effects on protection of townscape/heritage, supporting objective 4 (heritage and townscape) and should help contribute towards ensuring a wide mix of accommodation available for visitors, supporting objective 19 (employment/economy). The previous SA assessment found the policy to have potential for positive effects for these objectives and the proposed changes are not considered to change these effects or results of the previous SA assessment in relation to this.</p> <p>With regards to the use class order changes, the changes to the policy will not change the result of the previous SA assessment. The previous SA assessment found the policy to have potential for significant positive effects for objective 15 (access to services) and objective 19</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
			<p>(employment/economy) through delivery of a range of retail, cultural, leisure and employment uses, and this is still considered to be the case. The proposed changes to the policy are not considered to change these effects or the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM72	Policy SSA6 Page 164	<p><b><i>SSA5 Madeira Terrace and Madeira Drive</i></b>  <i>Amend second paragraph of policy to read:</i></p> <p>Planning permission will be granted for proposals that accord with the Development Plan <u>and respect the significance of the Grade II* Madeira Terrace and other associated designated and undesignated heritage assets, prioritising their repair and restoration</u> and meet the following site specific requirements:</p>	<p>This proposed change to policy text updates the listing status of Madeira Terrace and requires the significance of this and other assets to form a key planning consideration for developments in this area.</p> <p>The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape) through the various policy requirements which reflects the council priority to restore and refurbish the Terrace, therefore contributing to conserving an enhancing heritage assets and their settings. The proposed change adds further strength to the policy in relation to this SA objective, however, is not considered to change the results. The change in status from Grade II to II* is also not considered to change the findings of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM73	Supporting text to Policy SSA6 paragraph	<p><b><i>SSA5 Madeira Terrace and Madeira Drive</i></b>  <i>Amend first sentence of supporting text at paragraph 3.44 and add new sentence to end of the paragraph to read:</i></p>	<p>This proposed change is to the supporting text and provides updated context to the status of various heritage assets, including Madeira Terrace. This provides wider context however is not considered to have any implications for the SA, nor change the findings of the previous SA assessment</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	3.44 page 165	<p>Madeira Terrace is a <del>Grade II listed</del> unique structure running half a mile along the seafront and includes 151 separate arches, a Victorian promenade with raised walkway, access stairs, associated buildings and lift towers. It is considered to be the longest cast iron structure in Britain, running from the Aquarium Colonnade to the Volk's Railway maintenance building. Since 2012 Madeira Terrace has been closed to the public as the structure has degraded and become unsafe. <u>Madeira Terrace, Lift and Shelter Hall have been re-graded to II* and have been added to the Historic England list of heritage assets at risk. The East Cliff Conservation Area, within which Madeira Terrace plays a key part, has also been identified as at risk.</u></p>	<p>which found the policy to have potential for significant positive impacts for the relative objective. No additional SA assessment of this policy is considered necessary.</p>
PM74	Policy SSA6 paragraph 3.45 page 165	<p><b><i>SSA5 Madeira Terrace and Madeira Drive</i></b>  <i>Amend first, third and fourth sentence of supporting text at paragraph 3.45 to read:</i></p> <p>The council is committed to the retaining, restoring and reactivating the Grade II* listed structure. The council has allocated £13.4million funding for Madeira Terraces restoration. The renovation of Madeira Terrace will need to be sensitive to the structure's unique <u>and intrinsic heritage value and informed by a Conservation Management Plan which will be a material planning consideration.</u> <del>and</del> <u>Proposals will need to be financially sustainable commercially viable in order to pay for its contribute to its restoration and long term maintenance. A potential option is to develop new uses and activities within</u> <del>It is likely that a variety of commercial uses will be placed in the arches of Madeira Terrace.</del></p>	See commentary for PM72 and PM73

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PM75	Supporting text to Policy SSA6 paragraph 3.46 page 165	<p><b>SSA5 Madeira Terrace and Madeira Drive</b>  <i>Amend paragraph 3.46 of supporting text to read:</i></p> <p>Uses should be complementary to the area and the vision for this part of the seafront and could include a wide variety of uses such as cafes, bars, restaurants, boutique retail, an arts centre/ Heritage Interpretation and Learning centre, an outdoor sports activity centre, museum space, a hub for creative industries with incubator/ workspace and small scale/ <u>boutique visitor accommodation (with limited service)</u> <del>boutique hotel</del>. However, residential use will not be permitted. Careful consideration needs to be given to the relationship and connection between <u>potential</u> <del>the</del> businesses within the arches and <u>Madeira Terrace's historic use for walking and as a 'grandstand' and the wider area's ongoing role as Brighton and Hove's premier events space and the beach. An initial phase of repair or regeneration is likely to inform a holistic strategy for Madeira Terrace*</u>.</p> <p><i>And add new footnote*:</i> <u>The Madeira Terrace 30 Project was commissioned in 2020 to consider the initial phase of repair and regeneration of part of the Madeira Terrace.</u></p>	<p>This proposed change is to the supporting text and greater context in relation to the type of visitor accommodation that may be supported, provides historic context to Madeira Terrace and reflects work undertaken in relation to repair. These changes provide wider context however are not considered to have any implications for the SA, nor change the findings of the previous SA assessment. No additional SA assessment of this policy is considered necessary.</p>
PM76	Supporting text to Policy SSA6 paragraph 3.47 page 165	<p><b>SSA5 Madeira Terrace and Madeira Drive</b>  <i>Amend the second sentence in paragraph 3.47 of the supporting text to read:</i></p> <p>A number of options will need to be considered <del>such as the feasibility</del> <u>including the reopening of</u> the closed staircases between Marine Parade and Madeira Drive <u>and the feasibility of improving lift access to include</u> whether Madeira Lift could be opened all year round <u>and/or the provision of additional</u></p>	<p>These proposed changes are to the supporting text and provide additional options in relation to improving access, relating back to policy criteria (c) and (d).</p> <p>The previous SA assessment found the policy to have potential for significant positive effects for objective 15 (access) through the various policy requirements relating to improving access and reducing severance. The proposed changes add further strength to the policy in relation to this</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		lift access, as well as improved wayfinding and reducing the severance caused by the Volks railway <u>whilst improving its visual setting.</u>	SA objective, however, is not considered to change the results. No additional SA assessment of this policy is considered necessary.
PM77	Policy SSA6, page 167	<p><b>SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive</b>  Amend the two bullet points under first paragraph of policy to read:</p> <ul style="list-style-type: none"> <li>• leisure uses (Use Classes <del>D2E</del> (d) and F2) or art and heritage uses (Use Classes <del>D1</del> F1(b) and F1 (c)) appropriate to the character of the seafront providing the main use of the site; and</li> <li>• ancillary supporting retail uses (Use Classes <del>A1, A3, A4 and A5</del> E (a), E (b), Public house, wine bar, or drinking establishment (Sui Generis) and hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises (Sui Generis).</li> </ul>	<p>This proposed change to SSA6 has been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>The proposed changes to the policy will not change the result of the previous SA assessment. The previous SA assessment found the policy to have potential for significant positive effects for objective 15 (access to services) through delivery of a range of retail, cultural and leisure opportunities; and for objective 19 (employment/economy) through the increased offer that these uses will provide, supporting footfall and the economy in this location. This is still considered to be the case. The proposed changes to the policy are not considered to change these effects or the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM78	Policy SSA7, page 169	<p><b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b>  Amend bullet point under first paragraph of policy to read:</p> <ul style="list-style-type: none"> <li>• <del>B1a</del> E(g) (i) (offices), <del>D1</del> E (e) (health) F1 (a), (health/education) and/or other ancillary uses directly associated with the Stadium and/or Sussex and Brighton Universities.</li> </ul>	<p>These proposed changes to SSA7 have been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>Although the SA commentary under SA objective 19 (economy and employment) for this policy refers to B1a uses, the changes to the policy will not change the result of the actual SA assessment. The previous SA assessment found the policy to have potential for significant positive effects for this objective through delivery of new business</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
			<p>floorspace contributing towards employment opportunities and economic growth.</p> <p>The previous SA assessment for SA objective 15 (access to services) refers to the potential for positive impacts arising from delivery of health/education uses. This is still considered to be the case.</p> <p>The proposed changes to the policy are not considered to change these effects or results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM79	Supporting text to SSA7, page 170	<p><b><i>SSA7 Land Adjacent to American Express Community Stadium, Village Way</i></b>  <i>Amend final sentence in paragraph 3.54 to read:</i></p> <p>The site provides an opportunity to enhance the facilities of the Stadium by providing for example <del>B1a</del> offices or <del>D1</del> health/ education uses associated with the Stadium or the Universities.</p>	See commentary under PM78
PM80	Policy H1	<p><b><i>Amend policy wording to read:</i></b></p> <p>Planning permission will be granted for proposals that accord with the Development Plan and which provide the <del>minimum</del> indicative amounts of development shown in the tables.</p>	Although the SA bases the assessment on the indicative amount, full reassessment of H1 required to assess this change and ensure there is no reference to the quantum being minimums.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening									
PM81	Policy H1, Table 6 page 174	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Table 6 – Residential Site Allocations amend Table 6 to delete:</i></p> <table border="1" data-bbox="472 387 1144 751"> <thead> <tr> <th data-bbox="472 387 696 568">Site Name</th> <th data-bbox="696 387 920 568">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="920 387 1144 568">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 568 696 751"><del>2-16 Coombe Road</del></td> <td data-bbox="696 568 920 751"><del>33</del></td> <td data-bbox="920 568 1144 751"><del>B1 starter business units/affordable workspace at ground floor.</del></td> </tr> </tbody> </table>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	<del>2-16 Coombe Road</del>	<del>33</del>	<del>B1 starter business units/affordable workspace at ground floor.</del>	<p>The proposed deletion of this site results in a change to the proposed indicative quantum of units proposed to be delivered. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H1 required to assess this change.</p>			
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses										
<del>2-16 Coombe Road</del>	<del>33</del>	<del>B1 starter business units/affordable workspace at ground floor.</del>										
PM82	Policy H1, Table 6 page 175	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Table 6 – Residential Site Allocations amend the table to add the following rows to read:</i></p> <table border="1" data-bbox="472 967 1144 1406"> <thead> <tr> <th data-bbox="472 967 696 1150">Site Name</th> <th data-bbox="696 967 920 1150">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="920 967 1144 1150">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1150 696 1294"><u>Land at Preston Road / Campbell Road, Brighton</u></td> <td data-bbox="696 1150 920 1294"><u>24</u></td> <td data-bbox="920 1150 1144 1294"></td> </tr> <tr> <td data-bbox="472 1294 696 1406"><u>154 Old Shoreham Road, Hove</u></td> <td data-bbox="696 1294 920 1406"><u>30</u></td> <td data-bbox="920 1294 1144 1406"><u>E class uses on ground floor</u></td> </tr> </tbody> </table>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	<u>Land at Preston Road / Campbell Road, Brighton</u>	<u>24</u>		<u>154 Old Shoreham Road, Hove</u>	<u>30</u>	<u>E class uses on ground floor</u>	<p>The proposed addition of two new sites results in a change to the proposed indicative quantum of units proposed to be delivered. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H1 required to assess this change.</p>
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses										
<u>Land at Preston Road / Campbell Road, Brighton</u>	<u>24</u>											
<u>154 Old Shoreham Road, Hove</u>	<u>30</u>	<u>E class uses on ground floor</u>										

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening																					
PM83	Policy H1, Table 6	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <b>Table 6 – Residential Site Allocations amend Table 6 to delete:</b></p> <table border="1" data-bbox="472 496 1211 1155"> <thead> <tr> <th data-bbox="472 496 813 679">Site Name</th> <th data-bbox="813 496 1019 679">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="1019 496 1211 679">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 679 813 751">87 Preston Road, Brighton, BN1 4QG</td> <td data-bbox="813 679 1019 751">25</td> <td data-bbox="1019 679 1211 751"></td> </tr> <tr> <td data-bbox="472 751 813 860">George Cooper House, 20-22 Oxford Street, Brighton</td> <td data-bbox="813 751 1019 860">20</td> <td data-bbox="1019 751 1211 860">Retail at ground floor level.</td> </tr> <tr> <td data-bbox="472 860 813 968">Whitehawk Clinic, Whitehawk Road, Brighton#</td> <td data-bbox="813 860 1019 968">38</td> <td data-bbox="1019 860 1211 968"></td> </tr> <tr> <td data-bbox="472 968 813 1040">Buckley Close garages, Hangleton #</td> <td data-bbox="813 968 1019 1040">12</td> <td data-bbox="1019 968 1211 1040"></td> </tr> <tr> <td data-bbox="472 1040 813 1080">189 Kingsway, Hove #</td> <td data-bbox="813 1040 1019 1080">60</td> <td data-bbox="1019 1040 1211 1080"></td> </tr> <tr> <td data-bbox="472 1080 813 1155">Kings House, Grand Avenue, Hove #</td> <td data-bbox="813 1080 1019 1155">169</td> <td data-bbox="1019 1080 1211 1155"></td> </tr> </tbody> </table>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	87 Preston Road, Brighton, BN1 4QG	25		George Cooper House, 20-22 Oxford Street, Brighton	20	Retail at ground floor level.	Whitehawk Clinic, Whitehawk Road, Brighton#	38		Buckley Close garages, Hangleton #	12		189 Kingsway, Hove #	60		Kings House, Grand Avenue, Hove #	169		<p>The proposed deletion of these sites results in a change to the indicative quantum of units proposed to be delivered. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H1 required to assess this change.</p>
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses																						
87 Preston Road, Brighton, BN1 4QG	25																							
George Cooper House, 20-22 Oxford Street, Brighton	20	Retail at ground floor level.																						
Whitehawk Clinic, Whitehawk Road, Brighton#	38																							
Buckley Close garages, Hangleton #	12																							
189 Kingsway, Hove #	60																							
Kings House, Grand Avenue, Hove #	169																							
PM84	Policy H1, Table 6 page 175	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <b>Table 6 – Residential Site Allocations amend the Total row to read:</b></p> <table border="1" data-bbox="472 1299 1211 1342"> <tbody> <tr> <td data-bbox="472 1299 813 1342"><b>TOTAL</b></td> <td data-bbox="813 1299 1019 1342"><b><del>1,051</del> 758</b></td> <td data-bbox="1019 1299 1211 1342"></td> </tr> </tbody> </table>	<b>TOTAL</b>	<b><del>1,051</del> 758</b>		<p>The proposed change to the indicative of units is proposed to be delivered. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H1 required to assess this change.</p>																		
<b>TOTAL</b>	<b><del>1,051</del> 758</b>																							

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening									
PM85	Policy H1, Table 6 pages 173 - 175	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Table 6 – Residential Site Allocations amend the following rows in Table 6 to read:</i></p> <table border="1" data-bbox="472 424 1227 922"> <thead> <tr> <th data-bbox="472 424 775 632">Site Name</th> <th data-bbox="775 424 943 632">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="943 424 1227 632">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 632 775 799">Land between Manchester Street/Charles Street, Brighton, BN2 1TF#</td> <td data-bbox="775 632 943 799">12</td> <td data-bbox="943 632 1227 799"><del>B1-e</del> <u>E class</u> floorspace or <del>D2</del> <u>entertainment and leisure</u> uses.</td> </tr> <tr> <td data-bbox="472 799 775 922">Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#</td> <td data-bbox="775 799 943 922">49</td> <td data-bbox="943 799 1227 922"><u>E class</u> uses</td> </tr> </tbody> </table>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	Land between Manchester Street/Charles Street, Brighton, BN2 1TF#	12	<del>B1-e</del> <u>E class</u> floorspace or <del>D2</del> <u>entertainment and leisure</u> uses.	Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	<u>E class</u> uses	<p>These proposed changes have been made to reflect changes to the use class order. These changes will not result in changes to the previous SA findings. However they will be considered in a revised assessment due to other proposed changes which will result in a significant change to the policy, including the deletion of 1 site, the addition of 2 new sites, and overall change in the indicative minimum quantum of units proposed to be delivered.</p>
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses										
Land between Manchester Street/Charles Street, Brighton, BN2 1TF#	12	<del>B1-e</del> <u>E class</u> floorspace or <del>D2</del> <u>entertainment and leisure</u> uses.										
Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	<u>E class</u> uses										
PM86	Policy H1, page 176	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Amend the following rows in Table 7 Mixed Use Housing Site Allocations to read:</i></p> <table border="1" data-bbox="472 1249 1189 1361"> <thead> <tr> <th data-bbox="472 1249 757 1361">Site Name</th> <th data-bbox="757 1249 925 1361">Indicative number of Residential</th> <th data-bbox="925 1249 1189 1361">Minimum Requirements for Other Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1361 757 1390"></td> <td data-bbox="757 1361 925 1390"></td> <td data-bbox="925 1361 1189 1390"></td> </tr> </tbody> </table>	Site Name	Indicative number of Residential	Minimum Requirements for Other Uses				<p>These proposed changes have been made to reflect changes to the use class order. These changes will not result in changes to the previous SA findings. However they will be considered in a revised assessment due to other proposed changes which will result in a significant change to the policy, including the deletion of 1 site, the addition of 2 new sites, and overall change in the indicative quantum of units proposed to be delivered.</p>			
Site Name	Indicative number of Residential	Minimum Requirements for Other Uses										

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			SA screening
			Units (Use Class C3)		
		71 - 76 Church Street, Brighton	50	<del>B1 E(g)</del> Employment floorspace on the ground floor which could include small scale workshop type units.	
		Post Office site, 62 North Road, Brighton#	110	3000sqm <del>B1 E(g)</del> employment floorspace.	
		27-31 Church Street (corner with Portland Street)#Ω	10	630sqm E(g) employment floorspace <del>B1 Offices.</del>	
		Former Dairy Crest Site, 35-39 The Drove, Hove, #	14	500sqm <del>B E, B2 or B8 use class</del> employment uses, ancillary retail.	
		Kingsway/Basin Road North (Site AB4 in Shoreham Harbour Joint Area Action Plan (JAAP) Policy CA2)#	90	Use classes <del>B1 E(g)</del> and B2 at Basin Road North level, use classes <del>E A2, B1 and ancillary A1</del> at Kingsway level, and use class C3 on upper storeys.	
		Prestwich House, North Street,	15	Use class <del>B1 E(g)</del> on lower storeys.	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed			SA screening
		Portslade (Site SP1 in JAAP Policy CA3)			
		Regency House, North Street, Portslade (Site SP4 in JAAP Policy CA3)	45	Use class <del>B1</del> <u>E(g)</u> on lower storeys	
		Former Flexer Sacks, Wellington Road, Portslade (Site SP5 in JAAP Policy CA3)	45	Use class <del>B1</del> <u>E(g)</u> on lower storeys and use class C3 on upper storeys. Associated leisure and assembly (use <del>class D</del> ) uses may be permitted provided they are demonstrated to be compatible with residential and employment uses in the vicinity.	
		Church Road/ Wellington Road/ St Peter's Road (Site SP6 in JAAP Policy CA3)	25	The southern portion of the site is allocated for new employment development (use classes <del>B1</del> <u>E(g)</u> , B2 and B3).	
		Station Road site, Portslade (Site SP7 in JAAP Policy CA3)	15	Use classes <del>A1, A2, A3 and B1</del> <u>E</u> fronting Station Road.	

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening												
PM87	Policy H2 – Table 8 Urban Fringe Allocations, page 180	<p><b>Policy H2 Housing Sites – Urban Fringe</b>  <i>Table 8 Urban Fringe Allocations amend table to delete ‘Land at and Adjoining Horsdean Recreation Ground, Patcham’ and associated detail:</i></p> <table border="1" data-bbox="465 539 1218 1134"> <thead> <tr> <th data-bbox="465 539 611 815">Site Name</th> <th data-bbox="611 539 741 815">UFA Reference</th> <th data-bbox="741 539 857 815">Total Site Area (Hectares)</th> <th data-bbox="857 539 987 815">Area of Development Potential (Hectares)</th> <th data-bbox="987 539 1095 815">Potential Number of Dwelling Units<sup>1</sup></th> <th data-bbox="1095 539 1218 815">Indicative Percentage of Family Sized Housing (3+ bedroom)</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 815 611 1134"><b>Land at and adjoining Horsdean Recreation Ground, Patcham</b></td> <td data-bbox="611 815 741 1134">Site 16 (2014 UFA); Study Area L4 (2015 UFA);</td> <td data-bbox="741 815 857 1134">6.32</td> <td data-bbox="857 815 987 1134">1.17</td> <td data-bbox="987 815 1095 1134">25</td> <td data-bbox="1095 815 1218 1134">50%</td> </tr> </tbody> </table>	Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	<b>Land at and adjoining Horsdean Recreation Ground, Patcham</b>	Site 16 (2014 UFA); Study Area L4 (2015 UFA);	6.32	1.17	25	50%	<p>The proposed deletion of this site results in a change to the indicative quantum of units proposed to be delivered. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H2 required to assess this change.</p>
Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)										
<b>Land at and adjoining Horsdean Recreation Ground, Patcham</b>	Site 16 (2014 UFA); Study Area L4 (2015 UFA);	6.32	1.17	25	50%										
PM88	Policy H2 – Table 8 Urban Fringe Allocations, page 182	<p><b>Policy H2 Housing Sites – Urban Fringe</b>  <i>Table 8 Urban Fringe Allocations amend the following row to read:</i></p>	<p>This proposed change alters the developable area of the site and the indicative quantum of units proposed to be delivered for this site. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H2 required to assess this change.</p>												

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed					SA screening										
		<table border="1"> <thead> <tr> <th data-bbox="465 467 613 683">Site Name</th> <th data-bbox="613 467 757 683">UFA Reference</th> <th data-bbox="757 467 900 683">Total Site Area (Hectares)</th> <th data-bbox="900 467 1077 683">Area of Development Potential (Hectares)</th> <th data-bbox="1077 467 1218 683">Potential Number of Dwelling Units<sup>2</sup></th> </tr> </thead> <tbody> <tr> <td data-bbox="465 683 613 997"><b>Land at former nursery, Saltdean #</b></td> <td data-bbox="613 683 757 997">Site 46a (2014 UFA); Study Area E14 (2015 UFA);</td> <td data-bbox="757 683 900 997"><del>0.96</del> <u>0.83</u></td> <td data-bbox="900 683 1077 997"><del>0.96</del> <u>0.75</u></td> <td data-bbox="1077 683 1218 997"><del>24</del> <u>18</u></td> </tr> </tbody> </table>					Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>2</sup>	<b>Land at former nursery, Saltdean #</b>	Site 46a (2014 UFA); Study Area E14 (2015 UFA);	<del>0.96</del> <u>0.83</u>	<del>0.96</del> <u>0.75</u>	<del>24</del> <u>18</u>	
Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Number of Dwelling Units <sup>2</sup>													
<b>Land at former nursery, Saltdean #</b>	Site 46a (2014 UFA); Study Area E14 (2015 UFA);	<del>0.96</del> <u>0.83</u>	<del>0.96</del> <u>0.75</u>	<del>24</del> <u>18</u>													
PM89	Policy H3, Table 9 page 186	<p><b><i>Policy H3 Purpose Built Student Accommodation</i></b>  <i>Amend policy at Table 9 Purpose Built Student Accommodation Sites - delete row:</i></p> <table border="1"> <thead> <tr> <th data-bbox="472 1142 736 1264">Site Name</th> <th data-bbox="736 1142 960 1264">Indicative number of bedspaces</th> <th data-bbox="960 1142 1189 1264">Other Required Uses</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>					Site Name	Indicative number of bedspaces	Other Required Uses				<p>The proposed deletion of this site results in a change to the indicative quantum of units proposed to be delivered. This is a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H3 required to assess this change.</p>				
Site Name	Indicative number of bedspaces	Other Required Uses															

<sup>2</sup> Sites denoted in italics form part of the wider urban fringe site and are not identified for development as required for mitigation

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening			
		<table border="1"> <tr> <td data-bbox="472 284 734 440">118–132 London Road, Brighton</td> <td data-bbox="734 284 958 440">232</td> <td data-bbox="958 284 1189 440">Ground floor uses must comply with Policy DM12</td> </tr> </table>	118–132 London Road, Brighton	232	Ground floor uses must comply with Policy DM12	
118–132 London Road, Brighton	232	Ground floor uses must comply with Policy DM12				
PM90	Supporting text to Policy H3 page 186	<p><b>Policy H3 Purpose Built Student Accommodation</b>  <i>Add new paragraph after paragraph 3.81 to read:</i></p> <p><u>“Where a site is located in an area with underground chalk aquifers identified as Groundwater Source Protection Zones by the Environment Agency, development will need to ensure that groundwater resources are protected from pollution and safeguard water supplies, in line with the requirements of Policy DM42.”</u></p>	<p>This proposed change is to the supporting text and requires development to ensure the protection of groundwater resources. The previous SA assessment found the impacts of the policy on objective 7 (improve water quality) to be negative due to the location of some sites within the GSPZ and lack of policy requirements relating to this. This new supporting text impacts more positively on this objective and will result in a change to the previous SA findings.</p> <p>Full reassessment of H3 required to assess this change.</p>			
PM91	Policy E1, page 187	<p><b>Policy E1 Opportunity site for business and warehouse uses</b>  <i>Amend bullet point after first paragraph of policy to read:</i></p> <ul style="list-style-type: none"> <li>• Business and warehouse premises (Use Classes <del>B1</del> <u>E(g)</u> and B8).</li> </ul>	<p>This proposed change has been made to reflect changes to the use class order. The SA does not assess the wider implications of changes to the use class order.</p> <p>The previous SA assessment found the policy to have potential for significant positive effects for this objective through support for delivery of new business floorspace, helping to increase employment land supply, thus contributing towards employment opportunities and economic growth. Although the SA commentary under SA objective 19 (economy and employment) for this policy refers to B1 and B8 uses, the proposed changes to the policy will not change the result of the actual SA assessment.</p>			

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
			No additional SA assessment of this policy is considered necessary.
PM92	Supporting text to Policy E1, paragraph 3.87, page 188	<p><b><i>E1 Opportunity site for business and warehouse uses</i></b></p> <p><i>Amend last sentence of supporting text at paragraph 3.87 to read:</i></p> <p><del>Regard should be given to the need to conserve and enhance biodiversity in accordance with CP10 Biodiversity and DM37 Green Infrastructure and Nature Conservation. In accordance with Policy DM37, development proposals must demonstrate that any adverse effects would not undermine the objectives of the designation, features of interest/importance and/or integrity of the area and that impacts can be mitigated and biodiversity net gains achieved.</del></p>	<p>This proposed change is to the supporting text and places a stronger emphasis on the need to ensure the objectives and integrity of LWS on part of the site are not undermined, as well as highlighting the need for impacts to be mitigable and biodiversity net gains to be achieved. This is considered to strengthen the policy. The previous SA found the impacts on SA objective 1 to be mixed in the short and medium term becoming positive in the longer term. This reflects the fact that the site is greenfield in nature as well as the LWS designation, in combination with the previously worded supporting text which required biodiversity to be conserved and enhanced. Although there is stronger emphasis on mitigation and biodiversity net gain within the supporting text impacts this is not considered to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
PM93	Appendix 2, page 198	<p><b><i>Appendix 2 Parking Standards</i></b></p> <p><i>Add wording before table in Appendix 2:</i></p> <p><u>Where the parking standards set out below refer to revoked use class the relevant standard should be applied as if they refer to the corresponding use in the new Use Class Order which came into effect in September 2020. For example, use class A1 has been revoked and is replaced by use class E(a).</u></p>	Within Appendix. Not assessed by SA.
PM94	Appendix 4 - Policy H2 Urban	<p><b><i>Appendix 4 Policy H2 Urban Fringe Housing Site Maps</i></b></p> <p><i>Delete indicative map titled 'Land at and adjoining Horsdean Recreation Ground':</i></p>	Change to map. No impact on SA.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	Fringe Housing Site Maps, page 211		
PM95	Appendix 4 - Policy H2 Urban Fringe Housing Site Maps, page 215	<p><b><i>Appendix 4 Policy H2 Urban Fringe Housing Site Maps</i></b></p> <p><i>Amend the site boundary of the indicative map titled 'Land at former nursery, Saltdean' (see also proposed changes to the Policy Map). New map is shown below:</i></p>	Change to map. No impact on SA.

## Appendix B Screening of Proposed Minor Changes

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PMM1	Introduction paragraph 1.8 page 8	<p><b>Relationship with other DPDs</b>  <i>Move the following text from paragraph 1.9 to paragraph 1.8 and amend as follows:</i></p> <p><b>“Shoreham Harbour Joint Area Action Plan (JAAP)<sup>2</sup> – provides a comprehensive, deliverable plan for the <u>regeneration future revitalization</u> of Shoreham Harbour. The JAAP was prepared jointly with Adur District Council and West Sussex County Council.”</b></p>	Not within policy. Factual update. No SA implications.
PMM2	Introduction paragraph 1.9 page 8	<p>Add the following text to paragraph 1.9</p> <p><b>“<u>Review of the Waste and Minerals Local Plan</u> – a focussed review of certain policies in the Waste &amp; Minerals Local Plan”.</b></p> <p>And amend the following text at paragraph 1.9 and delete associated footnote:</p> <p><b>Community Infrastructure Levy (CIL) – <del>once adopted</del> CIL <u>came into effect on the 5 October 2020</u> and allows local authorities to raise funds from development for the provision of infrastructure in and around their areas.</b></p> <p><del>1. Following an examination in public and consultation on proposed modifications CIL is expected to be adopted in June and introduced in October 2020.</del></p>	Not within policy. Factual update. No SA implications.
PMM3	Introduction, paragraph 1.10 page 9	<p><b>Duty to Cooperate</b>  <i>Amend the last sentence at the end of the paragraph to read:</i></p> <p><b>“A duty to Cooperate <del>Update</del> Paper is published alongside the Proposed Submission City Plan Part 2 and will include an updated Statement of Common Ground prepared by the West Sussex and Greater Brighton Local Planning Authorities. “</b></p>	Not within policy. Factual update. No SA implications.
PMM4	Table 1 page 10	<p><b>Table 1 Timetable for the Preparation of City Plan Part Two</b>  <i>Delete table and associated footnote:</i></p> <p><del>Table 1 Timetable for the Preparation of City Plan Part Two</del></p>	Not within policy. Editorial update. No SA implications.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening														
		<table border="1"> <thead> <tr> <th data-bbox="506 240 1229 328">City Plan Part Two stage of plan preparation</th> <th data-bbox="1229 240 1664 328">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="506 328 1229 381">Scoping Document (Regulation 18)</td> <td data-bbox="1229 328 1664 381">June 2016</td> </tr> <tr> <td data-bbox="506 381 1229 434">Draft Plan and SA (Regulation 18)</td> <td data-bbox="1229 381 1664 434">Summer 2018</td> </tr> <tr> <td data-bbox="506 434 1229 528"><b>Publication of Proposed Submission City Plan Part 2</b></td> <td data-bbox="1229 434 1664 528"><b>Approved by Council 23 April 2020</b></td> </tr> <tr> <td data-bbox="506 528 1229 667">Regulation 19 Consultation</td> <td data-bbox="1229 528 1664 667">Dates to be confirmed after Coronavirus (Covid-19) restrictions are lifted.</td> </tr> <tr> <td data-bbox="506 667 1229 719">Submission to the Secretary of State</td> <td data-bbox="1229 667 1664 927" rowspan="3">The timetable for next stages of the City Plan Part 2 will be published on the council's City Plan Part 2 webpage once a start date for the consultation has been set<sup>1</sup>.</td> </tr> <tr> <td data-bbox="506 719 1229 772">Examination in Public</td> </tr> <tr> <td data-bbox="506 772 1229 927">Adoption of City Plan Part Two</td> </tr> </tbody> </table>	City Plan Part Two stage of plan preparation	Date	Scoping Document (Regulation 18)	June 2016	Draft Plan and SA (Regulation 18)	Summer 2018	<b>Publication of Proposed Submission City Plan Part 2</b>	<b>Approved by Council 23 April 2020</b>	Regulation 19 Consultation	Dates to be confirmed after Coronavirus (Covid-19) restrictions are lifted.	Submission to the Secretary of State	The timetable for next stages of the City Plan Part 2 will be published on the council's City Plan Part 2 webpage once a start date for the consultation has been set <sup>1</sup> .	Examination in Public	Adoption of City Plan Part Two	
City Plan Part Two stage of plan preparation	Date																
Scoping Document (Regulation 18)	June 2016																
Draft Plan and SA (Regulation 18)	Summer 2018																
<b>Publication of Proposed Submission City Plan Part 2</b>	<b>Approved by Council 23 April 2020</b>																
Regulation 19 Consultation	Dates to be confirmed after Coronavirus (Covid-19) restrictions are lifted.																
Submission to the Secretary of State	The timetable for next stages of the City Plan Part 2 will be published on the council's City Plan Part 2 webpage once a start date for the consultation has been set <sup>1</sup> .																
Examination in Public																	
Adoption of City Plan Part Two																	
PMM5	Introduction paragraph 1.14 -1.18, page 11	<p><b>How to Comment on the Proposed Submission City Plan Part Two</b>  Delete paragraphs 1.14-1.18 and associated footnote as follows:</p> <p>How to Comment on the Proposed Submission City Plan Part Two</p> <p>1.14 The public consultation is delayed due to the Coronavirus (Covid-19) restrictions. The timetable for next stages of the City Plan Part 2 will be published on the council's City Plan Part Two webpage once a start date for the consultation has been set. Paragraphs 1.15 – 1.17 apply once the consultation has commenced.</p> <p>1.15 The City Council would like your views on the Proposed Submission City Plan Part Two and whether you think it meets the government's tests of soundness and legally compliant 5. You do</p>	Not within policy. Editorial update. No SA implications.														

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>not have to comment on everything in the Proposed Submission City Plan Part Two. We want to hear your views on those aspects that are of most interest to you.</p> <p>1.16 We recommend you make your comments using the council's online consultation portal: <a href="http://consult.brighton-hove.gov.uk/portal">http://consult.brighton-hove.gov.uk/portal</a>. This will help us handle your comments quickly and efficiently.</p> <p>1.17 The Proposed Submission City Plan Part Two and supporting documents including the proposed changes to the Policies Map and the Sustainability Appraisal (SA) are available on the Council's website (<a href="https://www.brightonhove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposedsubmission-stage-2020">https://www.brightonhove.gov.uk/content/planning/planning-policy/city-plan-part-two-proposedsubmission-stage-2020</a>) and once Coronavirus (Covid-19) restrictions are lifted, the council will make them available to be viewed at the customer service centres at Hove Town Hall and Bartholomew House Brighton and the main city Libraries (Jubilee, Hove and Portslade) during normal opening hours. The Proposed Submission CPP2 including the policies map and non-technical SA summary will be available to view at all other libraries during normal opening hours once Coronavirus (Covid-19) restrictions are lifted. Word versions of the Response Form are available on request to <a href="mailto:planningpolicy@brighton-hove.gov.uk">planningpolicy@brighton-hove.gov.uk</a></p> <p>1.18 The consultation period for the Proposed Submission City Plan Part Two will be set out in a Statement of Representations Procedure published on the council's City Plan Part Two webpage once a start date has been set. Council's Consultation Portal: <a href="http://consult.brighton-hove.gov.uk/portal">http://consult.brighton-hove.gov.uk/portal</a>  Email: <a href="mailto:planningpolicy@brighton-hove.gov.uk">planningpolicy@brighton-hove.gov.uk</a> (please respond using the Response Form) Post: Proposed Submission CPP2, Policy Projects and Heritage Team, Brighton &amp; Hove City Council, First Floor Hove Town Hall, Norton Road, BN3 3BQ</p>	
PMM6	Policy DM3 page 20	<p><b><i>DM3 Residential conversions and the retention of smaller dwellings</i></b>  <i>In footnote 1 to the policy, amend first sentence to read:</i></p> <p><sup>1</sup>The original floor area excludes later additions such as extensions, garages (including converted garages) and loft conversions <u>since the dwelling was built or as built on 1st July 1948</u>. The calculation of the original floor area must be based on internal dimensions only.</p>	Not within policy. Factual amendment. No SA implications.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PMM7	Policy DM4 page 22	<b>DM4 Housing and Accommodation for Older Persons</b> Add the following numbering to the second paragraph of policy to read:  ' <u>1.</u> Development proposals....'	Editorial update. No SA implications.
PMM8	Policy DM4 page 22	<b>DM4 Housing and Accommodation for Older Persons</b> Add the following numbering to the fourth paragraph of policy to read:  ' <u>2.</u> Proposals that....'	Editorial update. No SA implications.
PMM9	Supporting text to DM4 Paragraph 2.36 page 36	<b>DM4 Housing and Accommodation for Older Persons</b> Amend the final sentence in the fourth bullet point in paragraph 2.36 to read:  "Extra-care/assisted living homes normally fall either within Use Class C2 or C3, this <del>varies</del> <u>may vary</u> depending on the level of care provided and <del>whether overnight care is available</del> <u>the scale of communal facilities provided.</u> "	Editorial/factual update. No SA implications.
PMM10	Policy DM5 page 27	<b>DM5 Supported Accommodation (Specialist and Vulnerable Needs)</b> Add the following numbering to the second paragraph of policy to read:  ' <u>1.</u> Proposals for development ....'	Editorial update. No SA implications.
PMM11	Policy DM5 page 27	<b>DM5 Supported Accommodation (Specialist and Vulnerable Needs)</b> Add the following numbering to the third paragraph of policy to read:  ' <u>2.</u> Proposals that....'	Editorial update. No SA implications.
PMM12	Supporting text to Policy DM8, paragraph 2.72 page 37	<b>DM8 Purpose Built Student Accommodation</b> Amend the first sentence of the supporting text at paragraph 2.72 to read:  "However, the number of permitted PBSA bedspaces, <del>currently assessed to be 12,699,</del> remains below the number of students in the city requiring accommodation, particularly for students at the University of Brighton."	Factual/editorial update. No SA implications.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>Delete associated footnote 36:</p> <p><del>36 3,146 bedspaces managed by University of Brighton, 8,167 managed by University of Sussex, and 1,386 privately managed.</del></p>	
PMM13	Supporting text to Policy DM8, paragraph 2.73 page 37	<p><b>DM8 Purpose Built Student Accommodation</b>  Amend the first sentence of the supporting text paragraph 2.73 to read:</p> <p>“The council welcomes the development of new PBSA on appropriate sites. In addition to setting out criteria to guide the suitable location of PBSA, City Plan Part One Policy CP21 allocated five sites for new development, <del>of which Pelham Street remains undeveloped and without an extant permission.</del>”</p>	Factual update. No SA implications.
PMM14	Supporting text to Policy DM8, paragraph 2.77	<p><b>DM8 Purpose Built Student Accommodation</b>  Delete the following text in paragraph 2.77:</p> <p><del>“The majority of new PBSA developments in recent years have been located along the Lewes Road academic corridor due to the accessibility to the universities. Some of these locations are in areas not covered by Controlled Parking Zones so the council cannot restrict the number of cars brought to the city by occupants through permit free developments.”</del></p>	Editorial update to reflect council practice; no SA implications.
PMM15	Supporting text to Policy DM16 Paras 2.137 and 2.138	<p><b>DM16 Street Markets</b>  Amend supporting text at the first sentence of paragraph 2.137 and the first sentence of paragraph 2.138 to read:</p> <p>“Street markets <u>and stalls</u> are also important for the establishment of new entrepreneurial business by Brighton &amp; Hove residents.”</p> <p>“ The council will use conditions and/or obligations to ensure that the operation of markets <u>and stalls</u> do not have harmful impacts, and will require detailed layout plans as part of an application to allow consideration as to whether these matters have been properly addressed.”</p>	Adds further clarity; no SA implications.
PMM16	Policy DM33, para 2.250	<p><b>Policy DM33 Safe, Sustainable and Active Travel</b>  Amend paragraph 2.250 to read:</p>	Factual update; no SA implications.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p>“Brighton &amp; Hove is already one of the country’s least car-dependent cities outside London, with 38.2% of households not owning a car. A number of high-quality improvements to the public realm have been implemented in recent years. These have taken different forms, for example the award-winning shared space scheme on New Road, <del>and the addition of wayfinding boards and fingerposts throughout the city centre, and with further improvements in the pipeline, notably the redesign of Valley Gardens.”</del></p>	
PMM17	DM34 footnote 65	<p><b>Policy DM34 Transport Interchanges</b>  Amend footnote 65 as follows:  <u>“The test set out in Department for Transport C2/13 para 10 and NPPF para. 32. Circular 02/2013, particularly paragraphs 9 &amp; 10, and the NPPF (2019), particularly paragraphs 108 and 109”</u></p>	Factual update; no SA implications.
PMM18	Policy DM37 footnote 71 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Move footnote 71 to link to proposed first new bullet point on page 110 as follows:</p> <ul style="list-style-type: none"> <li>• <u>accordance with the mitigation hierarchy*</u></li> </ul> <p>Moved Footnote reads:  The “mitigation hierarchy” is set out in the Biodiversity – code of practice for Planning and Development and the British standard for Biodiversity management (BS42020) 2013. In essence it seeks avoidance of harm; then mitigation; then compensation alongside new benefits for wildlife.</p>	Editorial amendment. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM19	Policy DM37 page 111	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Add new section heading at start of section on protected sites to read:</p> <p><u>Designated Sites</u></p>	Editorial amendment. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM20	Policy DM37 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b></p>	Editorial amendment. No SA

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<p><i>Move the first paragraph of page 112 and place as a footnote linked to the first sentence of Part B. Nationally protected sites.</i></p> <p><i>Footnote to read:</i></p> <p><u>Development likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an Environmental Impact Assessment.</u></p>	<p>implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.</p>
PMM21	Policy DM37 page 112	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b></p> <p><i>Move the final paragraph of Part C Locally Protected Site and place as a footnote linked to the first sentence of Part C. Locally protected sites.</i></p> <p><i>Footnote to read:</i></p> <p><u>Development proposals considered to have a significant effect on local sites will be required to assess the impact by means of an Ecological Impact Assessment.</u></p>	<p>Editorial amendment. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.</p>
PMM22	Supporting text to Policy DM37 paragraph 2.275 page 112	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b></p> <p><i>Amend the second sentence of paragraph 2.275 of the supporting text to read:</i></p> <p>A development proposal’s impact upon the natural environment must be considered early in the design process, including cumulative <u>and in-combination</u> impacts and impacts upon the wider environment.</p>	<p>Further strengthens the SA assessment against SA objective 1 although does not have SA implications individually. However Policy DM37 reassessed as whole due to significant changes to the policy text and structure.</p>
PMM23	Supporting text to Policy	<p><b><i>Policy DM37 Green Infrastructure and Nature Conservation</i></b></p> <p><i>Amend the third sentence in paragraph 2.275 to read:</i></p>	<p>Editorial amendment. No SA</p>

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	DM37 paragraph 2.275 page 113	Applicants must properly assess the harmful effects of their proposals on the natural environment/natural capital <sup>73</sup> , seek to minimise the impact and give full consideration to achieving biodiversity net gains, in particular to species and habitats of <del>particular</del> <u>principal</u> importance (formerly known as BAP habitats)...	implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM24	Supporting text to Policy DM37 paragraph 2.275 page 113	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend the last sentence of paragraph 2.275 of supporting text to read:</i></p> <p>A Natural Capital Investment Strategy for Sussex <u>2019</u> <del>74 is being prepared which when adopted</del> will guide the implementation of this policy.</p>	Factual update No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM25	Supporting text to Policy DM37 paragraph 2.277	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend the second and third sentences of paragraph 2.277 of supporting text to read:</i></p> <p>However, the City's green infrastructure encompasses more than this 'spatial backbone' and includes; street trees, residential gardens, green roofs/walls and landscaped/flood management areas including sustainable drainage systems (SuDS). Cycling/walking routes and manmade features designed to enhance biodiversity/recreation (e.g. bird/bat boxes and bee bricks) are also important to the overarching concept in the City.</p>	Typographical correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM26	Supporting text to Policy DM37 paragraph 2.278	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend the final paragraph 2.278 of supporting text to read:</i></p> <p>Any invasive non-native species should be removed in accordance with legislation and <u>best practice guidance</u> (see also DM40 Protection of the Environment and Health – Pollution and Nuisance).</p>	Further strengthens the SA assessment against SA objective 1 although does not have SA implications individually. However Policy

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
			DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM27	Policy DM37 Footnote 75 page 113	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Delete repeated text from footnote 75 as follows:</p> <p><del>The South Downs Way Ahead Nature Improvement Area (NIA) is one of 12 NIAs that were announced by Government in February 2012. It sets a landscape scale approach to biodiversity and focuses on safeguarding endangered chalk grassland, vital for rare and endangered wildlife and the provision of clean drinking water and green space</del></p>	Typographical correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM28	Supporting text to Policy DM37 paragraph 2.280 page 114	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Amend first sentence of paragraph 2.280 to read:</p> <p>Proposals must assess potential impacts on, nature conservation features (which includes geodiversity) <u>(see paragraph 2.282)</u>.</p>	Improves clarity. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM29	Policy DM37 footnote 76 page 114	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Amend footnote to read:</p> <p>The Sussex Biodiversity Record Centre (Woods Mill, Henfield) is the principal source of up-to -date desktop biodiversity information. The Booth Museum (Dyke Road, Brighton) <u>may also</u> holds <u>additional data, specifically regarding geodiversity that may be relevant for nature conservation surveys.</u></p>	Factual correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM30	Supporting text to Policy	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Amend second sentence to supporting text at paragraph 2.282 to read:</p>	Factual correction. No SA implications

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
	DM37 paragraph 2.282 page 115	Ecological reports should be produced in line with the British Standard on biodiversity <del>management in planning and development</del> BS42020:2013 and CIEEM Technical Guidance (and subsequent revisions).	however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM31	Supporting text to Policy DM37 paragraph 2.282 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend eighth sentence to supporting text at paragraph 2.282 to read:</i></p> <p>Alongside this, opportunities should be explored to provide new benefits for wildlife <u>to deliver measurable biodiversity net gains.</u></p>	Further strengthens the SA assessment against SA objective 1 although does not have SA implications. However Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM32	Supporting text to Policy DM37 paragraph 2.282 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend final sentence to supporting text at paragraph 2.282 to read:</i></p> <p>Opportunities to deliver higher carbon dioxide savings through greater passive design, fabric and energy efficiency measures and low and zero carbon technologies will also be required (see CP8 Sustainable Buildings and DM443 Energy Efficiency and Renewables)</p>	Factual correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
PMM33	Supporting text to Policy DM37 paragraph 2.285 page 116	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend first sentence of paragraph 2.285 to read:</i></p> <p>Locally important sites include locally designated wildlife or geological sites; <del>{local geological sites (LGeoS) - (formerly called Regionally Important Geological and Geomorphological Sites (RIGGS)}</del> of regional significance), local wildlife sites (LWS) and local nature reserve (LNRs).</p>	Factual correction. No SA implications however Policy DM37 reassessed as whole due to significant changes

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
			to the policy text and structure.
PMM34	Policy DM44, footnote 103 Page 135	<b>DM44 Energy Efficiencies and Renewables</b> <i>Clarify Footnote 103:</i>  103: Carbon neutral recognises that it may not be possible to eliminate all emissions by this date, but that residual emissions can be off-set against carbon-positive measures such as tree planting. <u>The council will consider setting up a carbon offset scheme in the future.</u>	Further strengthens the SA assessment against SA objective 9 although does not have SA implications.
PMM35	Supporting text to Policy SSA4 Page 162	<b>SSA4 Sackville Trading Estate</b> <i>Amend supporting text at paragraph 3.34 to read:</i>  3.34 The site also falls within the Hove Station Neighbourhood Forum area. A draft Neighbourhood Plan has been produced and was <u>formally</u> consulted on in <del>summer 2018</del> <u>Spring 2019</u> . The draft Plan sets out aspirations and priorities for the site and wider area (identified in the draft Neighbourhood Plan as the Hove Station Quarter). <u>Once adopted the Neighbourhood Plan, will form part of the Development Plan for the city.</u>	Factual update. No SA implications
PMM36	Supporting text to Policy SSA4 Page 162	<b>SSA4 Sackville Trading Estate</b> <i>Amend supporting text at paragraph 3.38 to read:</i>  <del>“An Air Quality Management Area extends along Sackville Road to the junction with Old Shoreham Road. The effect of the new development on this</del> <u>the AQMA at the junction of Sackville Road and Old Shoreham Road</u> will require careful consideration in order to achieve compliance with the requirements of Policies CP9 Sustainable Transport and DM40 Protection of the Environment -Pollution and Nuisance.”	Factual update to reflect 2020 revised AQMA. Site assessment for SSA4 checked however no change as site still partially within AQMA. No change to SA assessment for SSA4.
PMM37	Supporting text to Policy SSA7 paragraph 3.59 page 170	<b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b> <i>In paragraph 3.59 of supporting text amend first sentence to read:</i>  “The design and massing of any proposed development will need to consider <u>by way of a Heritage Impact Assessment</u> the visual impact of the Grade II registered historic Stanmer Park and Listed Buildings within the University of Sussex campus (see Policy DM29 The Setting of Heritage Assets).	For clarification purposes. No impact on SA.

Modification Number	Proposed Submission City Plan Part 2 Reference	Modification Proposed	SA screening
PMM38	Footnote to SSA7, page 170	<b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b> Amend footnote text and weblink to: <sup>154</sup> <a href="https://www.southdowns.gov.uk/planning/planning-advice/landscape/">https://www.southdowns.gov.uk/planning/planning-advice/landscape/</a> <u>South Downs Landscape Character Assessment (LCA) 2020</u>	Factual update. No SA implications.
PMM39	Footnote 152, page 184	<b>Policy H2 Housing Sites – Urban Fringe</b> <i>Amend Footnote 152 to read:</i>  <sup>152</sup> Brighton & Hove City Council Planning Advice Note 06 Food Growing and Development <del>September 2011</del> <u>Updated September 2020</u>	Factual update. No SA implications.
PMM40	Supporting text to Policy H2 Paragraph 3.73 page 184	<b>Policy H2 Housing Sites – Urban Fringe</b> <i>Amend part of final sentence in the supporting text at paragraph 3.73 5o read:</i>  <del>Ecological Assessment including Protected Species Survey</del> <u>Ecological Impact Assessment</u>	Editorial correction. No SA implications.
PMM41	Supporting Text to Policy H2 Paragraph 3.76 page 185	<b>Policy H2 Housing Sites – Urban Fringe</b> <i>Amend second sentence of supporting text at paragraph 3.76 to read:</i>  “However, detailed surveys (including species surveys) will be required to support development proposals, and these must be used to inform the development of specific mitigation requirements.”	Editorial correction. No SA implications.
PMM42	Footnote 154 page 185	<b>Policy H2 Housing Sites – Urban Fringe</b>  Amend footnote text and weblink to: <sup>154</sup> <a href="https://www.southdowns.gov.uk/planning/planning-advice/landscape/">https://www.southdowns.gov.uk/planning/planning-advice/landscape/</a> <u>South Downs Landscape Character Assessment (LCA) 2020</u>	Factual update. No SA implications.
PMM43	Appendix 6 pages 221-223	<b>Appendix 6 Proposed Changes to Policies Map – Tables 1 and 2</b> <i>Delete Appendix 6</i>	Editorial change. No SA implications.

## Appendix C Policy Re-Appraisals

### DM12 Regional, Town, District and Local Shopping Centres

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 centres are situated within Conservation Areas and some of the buildings within the centres are listed. The policy supports E, F1 and F2 uses, as well as other uses providing certain criteria are met. The policy also supports meanwhile uses. The general supportive approach and flexibility of the policy is likely to reduce vacancies in centres. 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 indirect positive impacts through potentially reducing risk of vacancy or neglect. The policy has specific requirements which restricts amalgamation of units within the Lanes and North Laine areas; this will help to preserve the character of these Conservation Areas, having direct positive impacts. In addition, the policy now makes a clear link to the policy on shop front design, which should help to ensure any character is maintained or enhanced. Policy should have positive impacts on this objective.	I and D	P
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 particularly important in enabling local communities to meet their daily needs and can help to reduce the need to travel or support active travel. Amendments to the policy to reflect the use class order means the policy is no longer able to seek a certain proportion of different uses and has moved to a generally supportive approach for all E class uses, F1 and F2 uses within designated centres, as well other uses which will maintain vitality, viability and footfall. This change could result in a predominance of certain sub-uses within the E use class within centres, potentially resulting in an unbalanced mix and the need to travel further to meet needs. However, the continued designation of these centres, including the new Brunswick Town Local Centre, is on balance considered to support achieving this objective through the location of these uses together within centres that can be accessed by proximate communities. 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. Policy could have an indirect positive impact on this objective.	I	P
13. To make the best use of land available	+	+	+	Due to changes to the use class order, the policy is no longer able to retain a certain balance of uses within centres; this may result in a predominance of certain sub-uses within the E use class and may not make the best use of land/premises available in the city. However, the changes to the policy are considered add greater flexibility. The ability for different sub-uses within the E use class to change without the need for planning permission or the need to provide marketing evidence may help to reduce vacancies, and making better use of premises, therefore supporting the achievement of this objective. The policy still allows temporary or meanwhile uses, which may also help to prevent vacancies and helps to make good use of sites available. 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 permits change of use to residential and is clear where this would be permitted, including above or to the rear of units in designated centres. This could have positive impacts on this objective.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	Due to changes to the use class order the policy is no longer able to retain a certain balance of uses within centres; it will therefore be up to the market to decide. This could result in a predominance of a certain sub-type of E-class uses, and may reduce availability and accessibility of certain services. This is considered to weaken the policy and reduces the potential for significant positive effect in relation to the former policy. However, the supportive approach of the policy, in particular supporting E uses as well as F1 and F2 uses within centres should still ensure that these uses continue to be located together within centres; and their local accessibility should ensure access for local/proximate communities. On balance the policy is considered to have positive, but not significantly positive impacts for this objective.	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	As described under objective 15 above, the policy may lead to reduced availability and accessibility of certain services/sub-types within the E use class, as no longer requires retention of a certain proportion of uses with designated centres. This could impact health in various ways including reducing the potential to use active travel means to access services; and	I	P

				<p>reducing availability and accessibility of certain types of unit, for example, units that sell food, thus potentially impacting on access to food.</p> <p>However, the supportive approach of the policy, in particular supporting E uses as well as F1 and F2 uses within centres should still ensure that these uses continue to be located together within centres and therefore ensure access for local communities, potentially supporting active travel, supporting access to sports/recreation uses and supporting health through the potential to access health services.</p> <p>The policy now also requires consideration of amenity impacts, which is considered to strengthen the policy in this respect and should help to avoid adverse amenity impacts that could affect health, such as noise and light pollution. On balance, the policy is considered to have a positive impact on this objective.</p>		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>The changes to the use class order means the policy is no longer able to seek to retain a certain proportion of uses; it is instead supportive of all uses within the E use class as well as F1 and F2 uses. This could result in a predominance of certain uses within the E use class. Having a wider balance can help bring people to parades for different reasons at different times, supporting footfall and passive surveillance and this change is considered to weaken the policy relation to this objective. However, the flexibility that the E use class will bring may help to reduce vacancy rates and reduce the fear of crime that vacant units can bring, and could bring people to centres for different purposes, thus supporting their vitality and footfall. The policy makes direct reference to permitting other uses that will enhance the centres vitality and viability, which should also help support this objective.</p> <p>On balance the policy is considered to have a positive impact on this objective.</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. Although the policy is no longer able to maintain a certain balance of uses within centres, the supportive nature of the policy should ensure that E, F1 and F2 uses continue to be provided together within centres, and should support access to these services. This will have positive impacts on this objective.</p>	I	P
19. To contribute towards the growth of a sustainable and diverse	-/+	-/+	-/+	<p>Due to changes to reflect the use class order, the policy is no longer able to retain a certain proportion of uses within different centres, reflecting their</p>	D	P

economy, increase employment opportunities and meet local employment needs.				<p>importance within the retail hierarchy, and instead has moved to a general supportive approach of all E, F1 and F2 uses within all centres, allowing the market to decide. In addition, the policy no longer refers to primary or secondary frontage. There are positive aspects to the changes to the policy in relation to this objective, for example, the deletion of the need to provide marketing evidence, and the flexibility that this approach provides, could result in reduced vacancy and thus support the local economy and employment opportunities. In addition, the policy is supportive of other uses which maintain the vitality and vibrancy of centres, potentially increasing footfall, having economic benefits.</p> <p>However, the inability to retain a certain proportion of sub-uses particularly within the Regional Centre, for example, comparison-type shops, could impact upon the status and the attractiveness of the centre for those who would visit from outside the city. It is imperative that the Regional Centre continues to provide a high proportion of shops in order to maintain its status and attract visitors, as this provides a significant amount of jobs and has wider benefits for the visitor economy.</p> <p>Overall, the impacts on this objective are considered to mixed, reflecting the flexibility that the changes to the policy will bring, but the risk that this flexibility could be of detriment to the Regional Centre and the employment and economic opportunities this provides.</p>		
---	--	--	--	---	--	--

### DM13 Important Local Parades

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+	+	+	The policy designates 10 areas as ILPs, some of which 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 support E uses, and other uses where appropriate, within parades and ensure the ongoing functionality of the parade. The policy allows change of use to residential under certain circumstances and temporary or meanwhile which may help to reduce vacancy. Vacant units within Conservation Areas or within Listed Buildings could result in neglect of heritage assets or could have an adverse impact on the character of	I	P

				Conservation Area if the shops form part of its character. In addition, the policy now makes a clear link to the policy on shop front design, which should help to ensure any character is maintained or enhanced. Policy could have an indirect positive impact 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 designates 10 areas as ILPs and is supportive of all E uses within ILPs. ILPs are generally located within residential areas and are an important source of service provision which serve their locality. Having these services within easy walking distance can help meet residents' day to day needs locally, and can help to reduce the need to travel further afield which may be by less sustainable mode of travel. Whilst this part of the policy is considered to have positive impacts on this objective, it is noted that the policy no longer has any policy requirements relating Neighbourhood Parades or Individual Shops due to the changes to the use class order. Although this change is to ensure the policy is in accordance with legislation, it is considered to weaken the policy in relation to achieving this SA objective as could result in the need to travel further to access services. However, on balance, the policy is still considered to have positive impacts on this objective, through the designation of the ILPs.	D	P
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	+	+	+	Amendments to the policy to reflect the use class order means the policy is no longer able to seek a proportion of different uses and is only able to support all uses within the E use class within the ILPs. This could result in an unbalanced mix of sub-uses within the E use class within parades and a reduced balance across the city as a whole; this may not be the best use of land.  However, this flexibility may help to reduce vacancy that could otherwise occur and may help to make the best use of the building stock. In addition, the policy allows temporary or meanwhile uses, again helping to make the most of the building stock. On balance, the policy is considered to have positive impacts for this objective.	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 permits change of use to residential and is clear where this would be permitted, including above or to the rear of units in ILPs. This could have positive impacts on this objective.	D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	<p>Amendments to the policy to reflect the use class order means the policy is no longer able to seek to retain a certain proportion of different uses and instead supports all uses within the E use class within the ILPs. This could result in an unbalanced mix or predominance of a certain sub-type of use within the E use class within parades. In addition, the policy no longer has any requirements relating to Neighbourhood Parades and Individual Shop Units. Individual shops may now be classified as Local Community Uses (F.2a) provided it meets certain criteria which does provide these with some degree of protection. These changes to the policy may contribute towards a reduction in availability and accessibility of certain services within the E use class, which were previously protected under this policy. This is considered to weaken the policy in relation to this SA objective and change the score from significantly positive to positive.</p> <p>However, it is noted that the policy still designates 10 areas as ILPs, is supportive of all E uses within ILPs, which covers a broad range of services and facilities and also sets out criteria for when other uses may be permitted; these aspects of the policy should help to support availability and accessibility to services.</p> <p>On balance, the policy is considered to have positive effects for this objective, however, is no longer considered to be as significantly positive as the previous version.</p>	D	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>As described under objective 15 above, the policy may lead to reduced availability and accessibility of certain services within the E use class, as no longer requires retention of a certain proportion of uses, and no longer has any protection for smaller neighbourhood parades, individual units or sets any parameters in terms of distance to other services. This could impact health in various ways including reducing the potential to use active travel means to access services; and reducing availability and accessibility of certain types of unit, for example, units that sell food, thus potentially impacting on access to food.</p> <p>However, the designation of the ILPs is considered beneficial towards this objective, due to their proximity to the local populations they serve, the ability for them to support active travel, with recognition of their importance in</p>	I	P

				helping communities meet their day to day needs during Covid-19. It is noted that the policy is generally supportive of E uses and allows other uses within ILPs providing they meet certain criteria; this could include for example, community uses that facilitate access to health. The policy now also requires consideration of amenity impacts, which is considered to strengthen the policy in this respect and should help to avoid adverse amenity impacts that could affect health, such as noise and light pollution. On balance, the policy is considered to have a positive impact on this objective.		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The changes to the use class order means the policy is no longer able to retain a certain proportion of uses; it is instead supportive of all uses within the E use class. This could result in a predominance of certain uses within the E use class; having a wider balance can help bring people to parades for different reasons at different times, supporting footfall, passive surveillance and reducing fear of crime and this change is considered to weaken the policy relation to this objective. However, the flexibility that the E use class will bring may help to reduce vacancy rates and could bring people to ILPs for different purposes, thus supporting their vitality and footfall. The policy makes direct reference to permitting other uses that will enhance the ILP's vitality and viability, which should also help support this objective. On balance the policy is considered to have a positive impact on this objective.	I	P
18. To increase equality and social inclusion	+	+	+	The policy designates 10 areas as Important Local Parades; these are generally located within residential areas and are an important source of service provision which serve their locality. Having these services within easy walking distance can help meet residents' day to day needs locally and can help to reduce the need to travel further afield. This can be particularly beneficial for younger and older, as well as people with certain health needs or disabilities that may prevent them from travelling further afield. This part of the policy is considered to have positive impacts on this objective. However, it is noted that the changes to the policy resulting in changes to the use class order mean that there is no longer any requirements relating to Neighbourhood Parades or Individual Shop Units and the deletion of these aspects of the policy is considered to weaken the policy in this respect. On balance the policy is still considered to have positive impacts on this objective.	I	P

<p>19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>	+	+	+	<p>The policy is supportive of all uses within the E use class within ILPs as well as other uses that will help to increase vitality, viability and encourage footfall. The policy is therefore considered to support economic growth and employment opportunities within this use class in relation to the ILPs. Although the policy no longer requires a specific proportion of certain uses to be maintained instead relying on the market to decide, which could result in an uneven balance within centres and could impact upon footfall or reduce reasons to visit local parades, this does make the policy more flexible, could help to reduce vacancy rates, and in itself could have greater economic benefits than previous iterations of the policy. In addition, removal of policy requirements relating to the submission of marketing evidence are also considered to support the achievement of this objective, through increased flexibility. Unlike DM12, where the impacts are considered to be mixed for this objective, impacts are still considered to be positive for this objective due to the situation of these ILPs within the wider local centre hierarchy, with ILPs not being a significant contributor to employment or the economy.</p>	D	P
--	---	---	---	---	---	---

**DM37 Green Infrastructure and Nature Conservation**

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 three aspects of this policy; the first, Green Infrastructure, should result in significant positive effects for this objective as is concerned with safeguarding existing and incorporating new green infrastructure. The second part, Nature Conservation, is also considered to have significant positive effects for this objective as should ensure that adverse impacts on development are avoided and lead to the conservation and enhancement of biodiversity/geodiversity through requirements that should ensure all development is in accordance with the mitigation hierarchy, should result in net gains in biodiversity, the protection of protected and notable species, management of habitats and invasive species control, and enhancements to various components such as the NIA, protected species, ancient woodland, marine biodiversity etc. The policy requirement for proposals to be supported by investigation and mitigation measures also supports the achievement of this objective</p> <p>It is recognised that the third 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, particularly following revisions to Parts A and Parts B of the policy to address representations, reflects the relative importance of each type of site, and requires an appropriate level of assessment to assess potential impacts (e.g. HRA/EIA). In addition, for all designated sites, the overarching paragraph requirements should ensure that the objectives of the designations are not undermined, that funded management plans are in place, and that impacts can be mitigated and additional net gains achieved. This new emphasis on additional net gains further strengthens the policy and provides clarity between the mitigation hierarchy and net gain principles. Although it is recognised that Part C allows development that may have an adverse effect on the integrity of local sites which are allocated for development within the development</p>	D	P

				<p>plan, the subsequent criteria still requires appropriate mitigation and biodiversity net gains on these sites; this should result in positive effects overall. In addition, overarching criteria set out within the Nature Conservation section of the policy will also apply.</p> <p>Overall, the policy should have significant positive impacts on this objective.</p>		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	-/+	-/+	<p>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 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, for example, by creating new areas of open space or improving other areas of open space. Adverse impacts are not anticipated to be significant.</p> <p>Mitigation provided by CPP1 CP16 Open Space which requires allocated sites to have regard to maintaining some open space, and for new development to contribute to provision of open space.</p>	I/D	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</p>	I	P

				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.		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	Sites of a natural form, as well as trees and other forms of green infrastructure play an important role in regulating the environment, including absorbing water and helping to reduce flood risk. The policy recognises the importance of green infrastructure in relation to retaining 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
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.	I	P

				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.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>Access to the natural environment and green and open spaces have documented benefits for both physical and mental health and well-being. The policy should lead to the protection of the wider green infrastructure network, which provides opportunities for physical activity and supports good mental health. 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 sets the framework for when development on designated sites would be permitted. This development would result in some losses in open space and potential for impacts on biodiversity which would require mitigation, 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>	I	P

### H1 Housing and Mixed-Use Site Allocations

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind	Temp/Perm
1. To protect, conserve and achieve a net gain in biodiversity	0/+	0/+	+	<p>The majority of the housing and mixed use sites (29 out of 34) 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 (5 out of 34) 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>	I	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.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	+	The majority (27 out of 34) 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. Of the 7 sites containing open space; 4 contain publicly accessible open space and 3 contain private areas of designated open space. Some of the approved planning consents include delivery of small areas of open space, or include a contribution towards improving a local open space which should result in positive impacts in the longer term. <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.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	All sites are within the built-up area boundary. Many are located within a central location, or well within the built-up area where there are no landscape sensitivities. 2 out of 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.	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	11 out of the 34 sites do not contain nor are in proximity to any heritage or archaeological designations and are unlikely to have any adverse impact. 23 of the sites contain a heritage asset, are in the setting of a heritage asset, and/or contain archaeological potential. Of these, 12 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 11 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 4 of these sites; and mixed/negative for 7 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	++	++	++	The majority of the sites (30 out of 34) are considered to have close access to a bus service providing a frequent service every 10 minutes; some sites also have	I	P

forms of transport and improve travel choice				<p>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.</p> <p>Some of the sites promote mixed uses, which can help reduce the need to travel.</p> <p>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.</p> <p>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 748 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.</p>		
6. To improve air and noise quality	-/+	-/+	-/+	<p>9 of the 34 sites are located within or adjacent to the AQMA and also have noise (road/rail) issues. 10 of the sites have no air or noise issues as are both outside the AQMA and have low noise levels. 8 of the sites have air quality issues but do not have noise issues; 7 of the sites have noise issues but not air issues. Therefore, 18 sites have no noise issues (although 8 of these do have air quality issues) and 17 sites have no air quality issues (although 7 of these do have noise issues).</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 issues. 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>	I	T

7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>29 of the 34 sites are not within either 1, 2 or 3 of a Groundwater Source Protection Zone. 5 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 also 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 DM42 Protection of the Water Environment.</p>	D	P
8. To reduce the risk from all sources of flooding to and from development	-/+	-/+	-/+	<p>33 of 34 sites are fully located within Flood Zone 1. 1 allocated site has a risk of tidal flooding and the SFRA required further consideration of the site by the sequential/exceptions tests.</p> <p>Of the 33 sites within floodzone 1, 7 have no risk of any form of flooding.</p> <p>Of the 33 sites within floodzone 1, 8 have no risk of surface water flooding and have groundwater levels more than 5m below ground therefore posing a minimal risk.</p> <p>Of the 33 sites within floodzone 1, 17 have either a risk of surface water and/or have 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 of the sites located within floodzone 1 had either a risk of surface water flooding or had groundwater levels less than 5m below surface, and the SFRA required further consideration of the site by the sequential/exceptions tests. The SFRA therefore found 32 of the sites to either have no risk or low risk of flooding; 2 of the sites allocated 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>	I	P

9. To reduce emissions of greenhouse gases that cause climate change	-/+	-/+	-/+	<p>20 of the 34 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>14 sites are located outside these areas and are unlikely to be able to connect due to their location.</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 (29 out of 34) consist of previously developed land, comprising existing buildings or cleared ground which does not contain any open space designations. 5 of the 34 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 sites 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 in green infrastructure 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 contamination.</p> <p>16 of the 34 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>	I	P
12. To minimise and sustainably manage waste	-	-	-	<p>5 of the 34 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. 5 of the sites are vacant/cleared sites therefore do not</p>	I	P

				<p>provide this opportunity. The remaining 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>		
13. To make the best use of land available	+	+	+	<p>12 of the 34 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 22 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 34 sites to deliver an indicative 748 dwellings across the city. The SA notes that although this amount has reduced from Proposed Submission stage, this reflects sites that are no longer being allocated due to development being largely complete on those sites.</p> <p>Sites allocated include 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 delivering between 10 and 14 units. In addition, the policy also allocates 5 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>	D	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</p>	I	P

				<p>children’s play-space/park. 24 of these sites are in desirable or acceptable walking distance to all of the above essential services. Some sites include potential to increase other uses and access to services on sites.</p> <p>Overall, impacts are considered to be significantly positive towards this objective.</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 and active travel.</p> <p>26 of the sites are 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. Although some sites contain open space, which could be lost to development, 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, and through policy CP16 which would require improvements to open space.</p>	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>8 of the 34 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> <p>The majority of the sites (26 out of 34 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>	I	P

18. To increase equality and social inclusion	+	+	+	<p>5 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. 23 out of the remaining 29 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 6 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.</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. 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 opportunity to increase skills of locally deprived communities, e.g. through the Local Employment Scheme, although would be dependent on take-up.</p>	I	P
19. To contribute towards the growth 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>9 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>13 of the 34 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

Policy H1: Housing site allocations – site assessment results

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
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, Old Ship Hotel, (garage), Brighton	0	0	0	++	++	++/-	++	-	+	+	0	+	+	++	+	+	++	++	0	Pos
Saunders Glassworks, Sussex Place	0	0	0	-	++	++/-	++	++	+	0	0	--	++	++	++	+	--	++	0	Mixed
Outpatients Department RSCH	++	0	0	++	++	--/+	++	-	++	+	+	--	++	++	++	+	+	++	+	Pos
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
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
Land at Preston Road/Campbell Road	++	0	0	--	++	++/-	++	-	--	++	+	--	+	++	++	+	++	+	--	Mixed
154 Old Shoreham Road	++	0	0	-	++	--	--	-	++	++	+	--	+	++	++	++	++	+	-	Mixed
<b>Overall Summary: predominantly...</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>-/+0</b>	<b>++</b>	<b>-/+</b>	<b>++</b>	<b>-/+</b>	<b>-/+</b>	<b>+</b>	<b>0</b>	<b>--</b>	<b>++</b>	<b>++</b>	<b>++</b>	<b>+</b>	<b>+</b>	<b>++</b>	<b>0/-</b>	

Policy H1: Mixed-use sites - site assessment results

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>	++	<b>0</b>	<b>0</b>	<b>-/+0</b>	+	<b>-/+</b>	++	<b>-/+</b>	++	+	<b>0/+</b>	-	+	++	++	+	+	++	+	

## H2 Urban Fringe Site Allocations

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>8 of the 15 site allocations contain local nature conservation designations: 7 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.</p> <p>Some sites include rare or protected species or habitats. UFA2015 and updated UFA2021 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 and biodiversity net gain. It is noted that the conclusions of the updated UFA2021 has resulted in one of the sites with a LWS designation to no longer be allocated.</p> <p>13 of the 15 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>Changes made following draft stage strengthen the policy in relation to this objective, should ensure that adverse impacts on designated sites are mitigated and should result in net gains in biodiversity, through 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. 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 adverse impacts are implemented and are effective, and that biodiversity net gains reach their potential. Mitigation would also be provided by CPP1 CP10 Biodiversity, as well as draft CPP2 policy DM37 Green Infrastructure and Nature Conservation.</p>	D	T/P

				Policy amended following SA recommendation at draft stage to include a reference to incorporating green infrastructure, which could also positively impact upon biodiversity.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	-/+	-/+	<p>5 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>10 of the 15 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 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 publicly 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>	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/+	<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 setting. UFA2015 and updated UFA2021 concluded that landscape impacts could be mitigated 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 15 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 S NDP 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 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>	D	T/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	2 of the site allocations are within or contain a designated heritage asset; 1 of the site allocations is within the setting of a designated heritage asset; 11 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.	D	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 11 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>		
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-/+	-/+	-/+	<p>Some of the sites have good access to regular public transport and various services, however some do not. All are located on the outer fringes of the city which may influence car ownership and method of travel and may result in an increase in transport movements in that location. However, the policy does require sustainable transport infrastructure which could support some journeys 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>	I	P
6. To improve air and noise quality	-/+	-/+	-/+	<p>None of the sites are situated within or adjacent to the AQMA. 12 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; 6 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</p>	I	T

				<p>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. 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>		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>9 of the sites are within a GSPZ; 6 of the sites are not within a GSPZ. Development could impact upon water quality where located within the GSPZ. 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. Overall impacts are considered to be positive.</p> <p>Additional mitigation also provided by CPP1 SA4 Urban Fringe policy which requires protection of GSPZ and emerging 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>All of the sites are within floodzone 1 and therefore have no risk of tidal flooding. 6 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 less 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.</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.</p> <p>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</p>	D	T

				<p>score reflects the 8 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 did not consider these sites to be at high risk of flooding and did not require their consideration through the sequential/exception tests.</p> <p>Mitigation should also be provided by CPP1 CP8 Sustainable Buildings, CP11 Flood Risk and draft CPP2 policy on SUDs.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	<p>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.</p> <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.</p>	D	P
10. To increase the city's resilience and ability to adapt to climate change	-/+	-/+	-/+	<p>11 of the 15 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 7% of the entire urban fringe will be developed. 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 8 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</p>	I	P

				<p>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>		
11. To improve soil quality	0	0	0	<p>Impacts are considered neutral overall, as most sites are considered to have low 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>	I	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>No sites are recommended to be developed in their entirety. All of the sites allocate a portion of the site, with the site allocations covering c.7% of entire urban fringe area. This should enable some greenfield functions to be retained on urban fringe sites.</p> <p>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.</p>	I	P

				Overall impacts are considered to be positive; housing will be provided whilst still enabling the retention of some greenfield functions on most sites.		
14. To provide housing, including affordable housing, to contribute towards meeting local needs	++	++	++	<p>The policy allocates sites to deliver 899 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 dwellings, to higher density flatted development, also helping to meet a range of needs. The policy also supports self/custom build and now requires 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>	D	P
15. To improve the range, quality and accessibility of services and facilities.	-/+	-/+	-/+	<p>7 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
16. To improve health and well-being, and reduce inequalities in health	-/+	-/+	-/+	<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 or lead to reduced well-being.</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>	I	T/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>		
17. To improve community safety, and reduce crime and fear of crime	+	+	+	<p>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.</p> <p>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.</p>	I	P
18. To increase equality and social inclusion	+	+	+	<p>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.</p> <p>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.</p> <p>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.</p> <p>Overall impacts are considered to be positive.</p>	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	<p>The majority of the sites are in open space uses and are not considered to contribute towards the local economy.</p> <p>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.</p> <p>Overall, the policy is found to have no impacts on this objective, as would not result in an increase in commercial floorspace and would not result in a loss of employment floorspace. Losses in economic activity are likely to be off-set by the benefits that house-building brings to the local economy.</p>		

Policy H2: Urban Fringe Housing Allocations – site assessment results

SA Objective / UF site number	1 & 2	4 & 4a	4b, 5 & 5a	11-12	17	21	21a	30	32-32a	33	38-39	42	46a	48-48c	50	Overall
1. Biodiversity	-	-	+	-	-	-/+	-	-	+	-	++	0/-	+	+	+	Mixed
2. Open space	--	0	++	--	--	++	0	--	0	--	0	-	0	++	++	Mixed
3.SDNP	-	0	0	--	-	+	-	-	-	-	-	0/-	-	+	+	Largely adverse
4. Historic built environment	0	-	-	--	--	--	-	--	-	0	--	0	0	0	-	Largely adverse
5. Transport	-	-	-	--	+	-/+	-	-/+	--	--	--	--	--	--	-	Largely adverse
6. Air and noise pollution	++	-	-	--	-/+	--	-/+	++	++	++	+	+	++	++	++	Mixed
7. Water quality	++	--	--	++	-	--	--	++	++	++	++	-	--	-	-	Mixed
8. Flood risk	+	-	+	-	+	+	+	+	+	+	-	-	-	-	-	Mixed
9. Greenhouse gas emissions	-	-	-	-	-	-	-	-	-	-	-	-	-	+	+	Largely adverse
10. Climate change adaptation	-	-	-	-	-	-	-	-	-	-	++	-	-	+	-	Largely adverse
11. Soil quality	0	0	0	0	0	0	0	0	0	0	--/+	--/0	--/0	+	0	Largely neutral
12. Waste	0	0	0	0	0	0	0	0	-	-	--	0	0	--	-	Largely neutral
13. Best use of land	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	Positive
14. Housing	++	++	++	++	++	++	+	++	+	++	++	++	++	++	++	Positive
15. Accessibility	+	++	++	-	++	+	+	+	-	-	-	-	--	--	-	Mixed
16. Health	+	++	++	-	+	+	+	+	-	-	-	-	-	-	-	Mixed
17. Community safety	++	++	++	+	++	++	++	--	-	++	++	++	++	++	++	Largely positive
18. Equalities & inclusion	++	++	++	++	++	++	++	++	++	++	++	++	++	++	++	Positive
19. Economic dev.	0	0	0	0	0	0	0	0	-?	-?	-	0	0	-	0	Largely neutral

<b>Overall Summary and Policy Considerations</b>	Mixed															
--	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	-------	--

### H3 Purpose Built Student Accommodation Allocations

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	0	0	0	There are no additional policy requirements relating to biodiversity within the policy. There are no sites of nature conservation importance on or adjacent to the sites and development is unlikely to have any effect on those nearest to the site as they are located some distance away. The sites are 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 the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	There are no additional policy requirements relating to landscape within the policy. The sites are both within an existing urban area and separated from the SDNP by existing development. There are no direct impacts on this objective by the policy itself.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	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; the other is fairly close to heritage assets, however 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 both 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	I	P

				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.		
6. To improve air and noise quality	+	+	+	The policy itself does not have any additional requirements relating to air or noise quality. Although it is recognised that both sites are within the AQMA, the sites' locations on a sustainable transport corridor, as well as 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. One of the sites suffers 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)	+	+	+	Both sites are within GSPZ1 and therefore development in this location could present a risk of pollution to groundwater resources e.g. through dispersal of pollutants. Although the policy itself has no requirements relating to water consumption or water quality, the supporting text now includes a reference to ensuring development protects groundwater resources, in accordance with DM42. Impacts considered to be positive.	D	T/P
8. To reduce the risk from all sources of flooding to and from development	-	-	-	The policy itself has no requirements relating to flood risk. Both sites have some risk of surface water flooding and therefore development in these location could be at risk of flooding. Both 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, both 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.	I	T

				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.		
9. To reduce emissions of greenhouse gases that cause climate change	+	+	+	The policy itself has no requirement relating to reducing greenhouse gas emissions. Neither sites are within a Heat Network Cluster Opportunity Area, although is in fairly close proximity. 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	-/+	-/+	-/+	<p>The policy itself has no requirements relating to measures which may support climate change adaptation. Both sites have a risk of surface water flooding, which could worsen with climate change, however as both are PDL sites with an urbanised form, it is considered unlikely that development itself will increase the risk of flooding. None of the sites currently include any green infrastructure, and could provide an opportunity to include net gains in green infrastructure..</p> <p>On balance, the policy should have a mixed impacts on climate change 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.</p> <p>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.</p>	I	P
11. To improve soil quality	+	+	+	<p>Both sites may have potential for contamination based on current uses, however this is unknown at this stage. Any contaminated land would require remediation in accordance with other CPP1 policy. The policy itself does not include any additional specific policy requirements relating to land contamination and remediation.</p> <p>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.</p> <p>Overall impacts are positive towards improving soil quality.</p>	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. A development over a bus depot shed 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 affordable housing, to contribute towards meeting local needs	++	++	++	The allocations would provide accommodation for an indicative 290 students, making a significant contribution to student housing needs. The policy would also indirectly have a positive impact on the local housing market, as may reduce the need to provide accommodation for students in HMOs, and could potentially result in some HMOs being converted back into C3 housing.	I/D	P
15. To improve the range, quality and accessibility of services and facilities.	+	+	+	The policy would not result in delivery of any services or facilities as such. The policy has no additional requirements relating to improving access. However the 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. One of the sites suffers from high levels of road noise, which could impact upon occupier's health. Both sites are 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.	I	P

				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.		
17. To improve community safety, and reduce crime and fear of crime	0	0	0	One of the sites is located within a SOA which does not have a high level of crime deprivation, however the other is within the 10%-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 opportunities and meet local employment needs.	0	0	0	The policy will not result in any gains in employment floorspace, nor should it result in any losses, as the bus depot on Lewes Road and workshop is in sui generis uses. In addition, retail uses would need to be retained at ground floor level on London Road to ensure policy compliance. Policy not considered to have any impacts on this objective.		

### Policy H3: Student Housing Site Allocations – site assessment results

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
45 & 47 Hollingdean Road, Brighton	++	0	0	0	++	--/+	--	-	+	+	+	--	+	++	++	++	-	++	0	Mixed
Overall	++	0	0	0	++	--/+	--	-	+	+	+	--	+	++	++	++	-/+	++	0	Mixed

## Appendix D Site Assessments

### H1 – Updated site assessments

SA site assessment: 25 Ditchling Rise / rear of 57-63 Beaconsfield Road, Brighton, BN1 4QL (*updated to reflect newly designated AQMA 2020*)

<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

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 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,	--	Site immediately adjacent to Grade II* listed London Road Railway Viaduct.

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 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 or adjacent to AQMA. Development of site unlikely to generate significant numbers of additional vehicles which would impact upon air quality.  Site subject to railway noise and road noise exceeding 55 dcblls which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site is PDL. Site is situated entirely within Flood Zone 1. 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 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.
<b>Overall Summary and Policy Considerations</b>	mixed	No issues:  Development of the site is unlikely to raise any issues with the following objectives: biodiversity as 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 development of site at suggested quantum unlikely to generate traffic volumes that would

		<p>significantly effect air quality; 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>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:</p> <p>Development of the site would have positive impacts for housing. If 15 dwellings are provided this should include some affordable units. Delivery of 15 units would provide a site density of 166dph which would help to make the best use of land. A scheme in this location has potential to be car-free. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Site could include other uses as part of a mixed use scheme which could provide passive surveillance and support community safety. The site may also provide employment/training opportunities for adjacent deprived communities.</p>
--	--	--

**SA site assessment: Land between Manchester Street/Charles Street, Brighton (updated to reflect newly designated AQMA 2020)**

<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 not within or adjacent to AQMA. Development of site unlikely to result in significant change in average vehicle flow which would impact upon air quality. 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 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.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	?	Unknown whether site has potential for contamination. Unknown what previous uses prior to car-park involved.
12. To minimise and sustainably manage waste	0	There are no buildings on site or resources that could be reused.
13. To make the best use of land available.	++	Development of the site would provide the opportunity to make better use of a predominantly derelict site. If 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 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; air quality as not located within the AQMA and development of site at suggested quantum unlikely to generate traffic volumes that would significantly effect air quality; 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. 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:</p> <p>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: Old Ship Hotel, 31-38 Kings Road, Brighton (updated to reflect newly designated AQMA 2020)**

<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**

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 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.	-	<p>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.</p> <p>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.</p> <p>Archaeological potential outlined in Desk Based Assessment submitted with application and archaeological comments suggested that archaeological mitigation would be required.</p>
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus and rail services. Shops and health facilities within close walking distance.
6. To reduce air and noise pollution.	++/-	Site not within or adjacent to AQMA. Development of site unlikely to result in significant change in average vehicle flow which would impact upon air quality.

		<p>Site subject to road noise levels exceeding 55dcbLs.</p> <p>Although the proposed use of the site is predominantly residential, which in itself is unlikely to generate significant noise, it is noted that the site is in close proximity to various uses that may generate night-time noise. This would need careful consideration to protect the amenity of future occupiers on site, but also to protect the existing adjacent uses and enable them to operate.</p>
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL. Site is situated entirely within Flood Zone 1. None of site has any risk of surface water flooding. 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 facilities.	++	Good access to majority of services. Most services within desirable walking distance including primary school (300m), shops (<50m), health (220m); recreation (600m) within acceptable walking distance. Secondary schools within preferred maximum distance.
16. To improve health and well-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 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	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; air quality as not located within the AQMA and development of site at suggested quantum unlikely to generate traffic volumes that would significantly effect air quality; 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

		<p>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:</p> <p>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 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 (*updated site assessment to reflect change in potential use*)**

<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.

	Some E class uses also considered to be suitable on this site.
--	--

**Nb: approved planning application taken into consideration with scoring**

SA Objective	Score	Commentary
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 car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and train station. Shops, health and some other facilities all within close proximity of site and within walking distance. Noted that the approved scheme is car free and should therefore not generate an increase in vehicle movements in the location.
6. To reduce air and noise pollution.	--/+	Site within AQMA. Approved scheme is car free and therefore unlikely that the development will generate an increase in light vehicle movements that could significantly affect air quality in this location.  Site does not suffer from road noise.

7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	PDL site. 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, and reduce crime and fear of crime.	+	Site easily accessible. Site situated within 30% most deprived SOA (crime domain).
18. To increase equality and social inclusion	++	Site will deliver 40% affordable housing, and 3 wheelchair accessible units supporting the housing needs of people with protected characteristics. Site located within 10% most deprived SOA (employment domain) and 20% most deprived SOA education domain and could provide opportunities to increase training and skills.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	+	Some E class uses are also considered suitable for this site.
<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; and access and health due to proximity to services.</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</p>

		<p>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 employment/training opportunities for adjacent deprived communities. Site may also have potential to deliver some E uses.</p>
--	--	--

**SA site assessment: Post Office site, 62 North Road, Brighton (updated to reflect newly designated AQMA 2020)**

<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.

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.	--	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.	-/+	Adjacent to 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 in the adjacent AQMA.  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.

17. To improve community safety, and reduce crime and fear of crime.	-	Site situated within 10% most deprived SOA (crime domain). Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.
18. To increase equality and social inclusion	++	Site capable of delivery 40% affordable housing. Site within 20% most deprived SOA (employment domain) and 20% most deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Site currently used as post office delivery office in a mix of uses. Delivery of 3000sqm of B1 floorspace would help to replace any lost employment floorspace, with more modern workspace, within a central accessible location.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>No issues:</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; 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 within a conservation area and is adjacent to listed buildings. Although the site is not within the AQMA it is adjacent to it; any traffic to and from the site may need to travel through the AQMA and the amount of development proposed 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:</p> <p>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: Kingsway/Basin Road North, Hove/Portslade (*updated to reflect newly designated AQMA 2020*)**

<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 improve sustainable access to it.	+	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space. Planning consent for one of the sites includes a S106 contribution which should improve local park facilities.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Site has very good access to regular bus services. Some essential services located within close proximity; some located further from the site.
6. To reduce air and noise pollution.	-/-	Site not within or adjacent to AQMA. However, development across the site may result in an increase in vehicle movements that could have a significant effect on air quality in this location (e.g. more than 500 daily vehicle movements).  Site suffers from road noise. In addition, the site is in close proximity to the working 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	--	<p>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.</p> <p>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.</p> <p>Site has also undergone sequential and exception tests as part of JAAP process and SFRA recommended further testing through sequential and exception tests.</p>
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 has high levels of road noise which could impact upon health.
17. To improve community safety, and reduce crime and fear of crime.	++	Site situated within 50% most deprived SOA (crime domain). Planning consent for one of the sites includes provision of private communal amenity spaces, which can increase passive surveillance and provides opportunity for community interaction. This consent also includes some commercial units at ground floor (Kingsway) level which would create an active frontage and further support community safety.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable housing. Site within 20% least deprived SOA (employment) and 20% least deprived (education), however is in fairly close proximity to areas with higher deprivation and could provide training opportunities for adjacent communities.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	There are currently various A and B uses on site. In addition to residential uses, the site is allocated for A1, A2, B1 and B3 uses, and is likely to result in an overall net increase in B floorspace. New employment floorspace provided is also likely to be of improved quality.
<b>Overall Summary and Policy Considerations</b>	Largely positive / no issues	No issues:  Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; heritage as does not contain any heritage or archaeological designations; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.

	<p>Potential adverse effects:</p> <p>Although the site is not within the AQMA, the amount of development proposed across 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:</p> <p>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: Station Road, Portslade (updated to reflect newly designated AQMA 2020)**

<b>Site Description</b>	A brownfield site comprising a 1 storey building occupier by Kwik Fit. Site is allocated as SP7 within JAAP policy CA3 North Quayside and South Portslade.
<b>Site Area</b>	0.17ha
<b>Current Use</b>	In B2 use (car-service centre)
<b>Potential Use</b>	Site has potential for mixed uses, with A1, A2, A3 and B1 permitted on site fronting Station Road, and 15 dwellings on the rear of the site and on upper storeys.

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designated sites. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either losses and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site has no heritage or archaeological designations on or adjacent to site.

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has good access to both bus and train services. Site within walking distance of most services.
6. To reduce air and noise pollution.	++	Site not within or adjacent to 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.
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	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; air quality as site not within the AQMA and the amount of development proposed for the site is unlikely to have a significant effect on air quality; water quality as site not within GSPZ; flood risk as site not at risk of tidal, fluvial or surface

		<p>water flooding; climate change adaptation as site already entirely PDL; access and health due to proximity to services; community safety as not within an area of high crime deprivation.</p> <p>Potential adverse effects:</p> <p>Development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings 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>
--	--	--

## H1 – Omission site assessments

SA site assessment: Land at Preston Road/Campbell Road, Brighton (omission site)

<b>Site Description</b>	A previously developed site in active use. Situated within DA4 within a mixed-use area comprised of various commercial and residential uses. A relatively back-land site, enclosed on all sides by existing buildings in residential or commercial uses, the railway embankment and railway viaduct.
<b>Site Area</b>	c. 0.34ha
<b>Current Use</b>	Vehicle repair shop and garage related services (B2)
<b>Potential Use</b>	24 units of C3

<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 sites of nature conservation importance. Part of LWS adjacent to south-west edge of site on railway embankment. 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	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,	--	Grade II* listed London Road Railway Viaduct crossed through the site; part of site situated underneath and immediately adjacent to the Viaduct.  Adjacent to 87 Preston Road which is locally listed.

townscapes, buildings and archaeological sites.		In relatively close proximity to Preston Park and Preston Village conservation areas.
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 400m 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 nor adjacent to AQMA. Development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality.  Parts of 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 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. Part of the site has a low/medium risk of surface water flooding (38% of site area). Remainder of site has no risk of flooding. 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.
9. To reduce emissions of greenhouse gases that cause climate change	--	Site not within or proximity to an identified potential heat network cluster. Site location may limit the success of certain zero-carbon technologies (e.g. solar PV).
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 and support climate change adaptation.
11. To improve soil quality	+	Site has potential for contamination based on existing uses and will have provide the opportunity to improve soil quality.

12. To minimise and sustainably manage waste	--	No potential to make any use of existing buildings/resources on site within proposed redevelopment.
13. To make the best use of land available.	+	Redevelopment of the PDL site could make better use of this site and help to make the best use of land available. Site likely to be capable of meeting minimum density targets for the area.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Provision of 24 dwellings on the site would include 40% affordable units.
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 B2 floorspace in this location. The site has good access to majority of services. Most services within desirable walking distance including shops (300m), health (310m), open space (300m), primary schools (700m) and secondary schools (1,620m).
16. To improve health and well-being, and reduce inequalities in health.	+	The site has good access to majority of services. Most services within desirable walking distance including shops (300m), health (310m), open space (300m), primary schools (700m) and secondary schools (1,620m) which could facilitate active lifestyles. The site could suffer noise quality issues which could impact upon amenity and health and the site's limited outlook could impact on occupier amenity.
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 may have potential for community interaction, e.g. through communal amenity space. Site located in 20% least deprived (crime domain).
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable housing. 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.	--	Site identified for housing. Site currently in employment use (B2) and redevelopment of site would result in loss of land in employment uses and associated jobs.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</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; transport as site has good access to public transport and has fairly good access to most services; air quality as the site is not within or adjacent to the AQMA; water quality as site not within a GSPZ; climate change adaptation as site entirely PDL; access and health due to proximity to services and potential for active lifestyles.</p> <p>Potential for adverse effects:</p> <p>Development of the site likely to raise issues with adjacent heritage assets. Parts of the site suffer from road/rail noise which could impact on the amenity of future residents. The site is not within a heat network opportunity zone and may have limited potential for low-zero carbon technologies due to its enclosed/shaded location impacting on climate change mitigation. Development of site is unlikely to provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Parts of the site have a risk of surface water flooding. Development could result in net loss of employment land.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 24 dwellings are provided this should include some affordable units. Delivery of 24 units would provide a site density of 104dph (based on developable area) which would help to make the best use of land. A scheme in this location has potential to be low-car/car-free. Development of a PDL site could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Site may have potential for contamination based on existing uses and could result in improved soil quality. The site may also provide employment/training opportunities for adjacent deprived communities.</p>
---	--------------	--

**SA site assessment: Furniture Village site, 154 Old Shoreham Road, Hove (omission site)**

<b>Site Description</b>	A previously developed site in active use. Situated within DA6 within a mixed-use area comprised of various commercial and residential uses. Situated on a prominent corner location on a classified A road.
<b>Site Area</b>	0.3ha
<b>Current Use</b>	In E use (Furniture Store)
<b>Potential Use</b>	30 units of C3; E 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 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	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.	-	Although non on site, site could be within the setting of proximate heritage assets; Hove Station Conservation Area. Small part of site has archaeological potential.
5. To reduce the need to travel by car, encourage travel by sustainable	++	Very good access to regular bus services. Well connected to pedestrian and cycle network. Fairly good access to most other services. Site likely to be able provide an element of car-free housing.

forms of transport and improve travel choice.		
6. To reduce air and noise pollution.	--	Site entirely within AQMA and existing streetscape may inhibit pollutant dispersal. Noise levels on site between 60-75dcbls and therefore exceed 55dcbls.
7. To improve water quality (ecological, chemical and quantity status)	--	Site is within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	-	Site is located within flood risk 1. Small part of site (5%) has a low risk of surface water flooding. 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.
9. To reduce emissions of greenhouse gases that cause climate change	++	Site situated within Hove Park Heat Network Cluster. Site could provide good opportunity to link to potential future network and/or incorporate other low carbon energy infrastructure.
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 and support climate change adaptation.
11. To improve soil quality	+	Site has potential for contamination based on former garage uses and offers potential to improve soil quality.
12. To minimise and sustainably manage waste	--	No potential to make any use of existing buildings/resources on site within proposed redevelopment.
13. To make the best use of land available.	+	Redevelopment of the PDL site could make better use of this site and help to make the best use of land available. Site likely to be capable of meeting minimum density targets for the area.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Provision of 30 dwellings on the site would include 40% affordable units.

15. To improve the range, quality and accessibility to services and facilities.	++	Redevelopment to include some E uses may increase access to some services and facilities in this area. Site has either desirable or acceptable access to most services including bus and train, shops (50m), open space (250m), primary schools (876m) and secondary schools (335m). Health services further than preferred maximum. Site is well connected to existing pedestrian and cycle network.
16. To improve health and well-being, and reduce inequalities in health.	++	Site has either desirable or acceptable access to most services including bus and train, shops (50m), open space (250m), primary schools (876m) and secondary schools (335m). Site is well connected to existing pedestrian and cycle network which could facilitate active lifestyles. The site could suffer from air and noise quality issues which could impact upon amenity and health and the site's limited outlook could impact on occupier amenity.
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 may have potential for community interaction, e.g. through communal amenity space. Site located in 10% least deprived LSOA (crime domain).
18. To increase equality and social inclusion	+	Site has potential to deliver 40% affordable housing. 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.	-	Site identified for housing with some potential for ground floor E uses. Site currently in E (retail) use. Redevelopment of site would result in loss of these jobs although this could be mitigated by providing some E use floorspace.
<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; SDNP due to situation within existing urban context; transport as site has good access to public transport and has fairly good access to most services; flood risk due to low risk on small part of site; climate change adaptation as site entirely PDL; access and health due to proximity to services and potential for active lifestyles.</p> <p>Potential for adverse effects:</p>

		<p>Development of the site likely to may raise issues with on-site archaeology. The site is within the AQMA and the site suffers from road noise which could impact on the amenity of future residents. Site is situated within A GSPZ 1 and may have some potential for groundwater flooding. Development of site is unlikely to provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Re-development could result in net loss of jobs.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing. If 30 dwellings are provided this should include some affordable units. Delivery of 30 units would provide a site density of 100dph which would help to make the best use of land. A scheme in this location has potential to be low-car/car-free. Development of a PDL site could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. The site is located within a heat network opportunity area and may have potential for low/zero carbon infrastructure. Site may have potential for contamination based on existing uses and could result in improved soil quality. The site may also provide employment/training opportunities for adjacent deprived communities.</p>
--	--	--

## H2 – Updated site assessments

The following table lists H2 sites that been subject to further assessment in the updated Urban Fringe Assessment 2021 and are still proposed to be allocated.

Site	UFA 2021 conclusion	Updated SA site assessment required
Benfield Valley (11/12)	The updated UFA 2021 carried out ecological appraisal of the site and concluded that development at the proposed quantum can be delivered and that impacts would be mitigable subject to sensitive design. The study therefore concurred with the findings of the UFA 2015. No changes were recommended to the site boundary or quantum.	No – see SA site assessment in Proposed Submission Sustainability Appraisal
Land at and adjoining Brighton Racecourse (30)	The updated UFA 2021 carried out ecological and landscape appraisal of the site and concluded that development at the proposed quantum could be achieved without impacting the integrity of the LNR and without significant landscape effects, and concluded that the reduction in scale and density of development (by providing the proposed 30 units) will provide more scope for sensitive design, mitigation and biodiversity net gain, such as enhancements within the wider LNR. The study therefore concurred with the findings of the UFA 2015. No changes were recommended to the site boundary or quantum.	No – see SA site assessment in Proposed Submission Sustainability Appraisal
Land at South Downs Riding School and Reservoir, Bear Road, Brighton (32/32a)	The updated UFA 2021 carried out ecological and landscape appraisal of the site and concluded that development at the proposed quantum could be achieved without impacting on the LWS designation and without significant landscape effects providing the development avoided having a suburbanising influence. The study therefore concurred with the findings of the UFA 2015. No changes were recommended to the site boundary or quantum.	No – see SA site assessment in Proposed Submission Sustainability Appraisal
Land north of Warren Road, Brighton (33)	The updated UFA 2021 carried out ecological and landscape appraisal of the site and concluded that development at the proposed quantum could be achieved without impacting on key features of the LWS or areas of the LWS which have high ecological value, with impacts able to be mitigated through enhancement of retained habitats; and that significant landscape effects could be avoided providing the development avoided having a suburbanising influence. The study therefore concurred with the findings of the UFA 2015. No changes were recommended to the site boundary or quantum.	No – see SA site assessment in Proposed Submission Sustainability Appraisal

Land at former nursery site, west of Saltdean Vale, Saltdean (46A)	Updated UFA 2021 reassessed the landscape sensitivity of the site and concluded that 18 dwellings, equating to a density of 25dph on 0.75ha of the site could be supported providing that density, height and massing is limited. Developing on 0.75ha of the site would be required to allow boundary vegetation to be retained to help mitigate impacts. This is a change to the indicative minimum amount of housing proposed in the Proposed Submission version.	Yes – amended quantum. See site assessment below
--	--	--

**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>	0.83ha
<b>Current Use</b>	Currently used for caravan storage
<b>Potential Use</b>	18 dwellings (reduced from 24 dwellings) on 0.75ha of site

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	+	PDL site consisting partly 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	-	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

its setting, and improve sustainable access to it.		football grounds which tie the site to the urban edge. Redevelopment could provide opportunity to improve appearance of the site. Updated UFA 2021 reassessed the landscape sensitivity of the site and concluded that 18 dwellings, equating to a density of 25dph on 0.75ha of the site could be supported providing that density, height and massing is limited. Developing on 0.75ha of the site would be required to allow boundary vegetation to be retained to help mitigate impacts.
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 18 dwellings on part of the site suitable for development (0.75ha of the site) would achieve a site density of 25dph. This is lower than that required by CPP1 CP14, however is reflective of 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 18 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	0	Site identified for housing only.

economy increase employment opportunities and meet local employment needs.		
<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; 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:</p> <p>Development of the site could raise issues with landscape due to proximity to the SDNP, although the UFA21 concludes that development impacts associated with 18 dwellings could be mitigated; 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 although as an urban fringe site, this takes into consideration the need to minimise other impacts.</p> <p>Potential positive effects:</p> <p>Development of the site would have positive impacts for housing, including affordable housing. If 18 units are provided, this should include 40% affordable housing and may also provide 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>

## Rejected Sites – sites not considered suitable for allocation

### SA site assessment: Land at Palmeira Avenue and Cromwell Road, Hove (omission site – not allocating)

<b>Site Description</b>	A previously developed site in active uses comprised of 4 detached dwellings and 1 building formerly used as a nursery. Located on a prominent corner location within a predominantly residential area comprised of a mix of low to high density dwellings.
<b>Site Area</b>	C.0.3ha
<b>Current Use</b>	Individual dwellings and unoccupied nursery
<b>Potential Use</b>	Site put forward as an omission site with potential to deliver 05 dwellings. Site not considered to have potential for redevelopment at the scale proposed due to a recently unsuccessful planning application on the site and due to uncertainty over availability.

<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. Not known to contain any BAP habitats. Site comprises private residential gardens which may have some potential for nature conservation interest. May also 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 of publicly 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,	--	The northern 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.

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 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.	++	Site not within or in close proximity to the AQMA. Site does not suffer from road or railway noise that exceeds 55dcbLs.
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. No risk of surface water flooding on site. Groundwater levels vary from 0.5-5m which poses some risk, although low risk.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network cluster. Some low/zero carbon technologies could be supported on site.
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 this undeveloped land, however could provide the opportunity to retain or provide some "natural" 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 and would require demolition. Unoccupied nursery has recently been significantly renovated following an arson attack.
13. To make the best use of land available.	?	PDL site currently in active use. Unknown if development of this site could achieve minimum density targets.

14. To provide housing, including affordable housing, to contribute towards meeting local needs.	?	Site capacity unknown. Promoter putting forward site forward would result in a positive impact for this objective however uncertain whether the amount could be delivered on site due to a recently unsuccessful planning application.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to most services. Health (250m), shops (400m), open spaces (400m), primary (330m) and secondary schools (900m) all within desirable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	++	Good access to most services. Health (250m), shops (400m), open spaces (400m), primary (330m) and secondary schools (900m) all within desirable walking distance which may facilitate active lifestyles. Development of site will not result in loss of public open space. No noise or air quality issues with the site.
17. To improve community safety, and reduce crime and fear of crime.	++	Site is easily accessible. Site is situated within 20% least deprived SOA (crime domain).
18. To increase equality and social inclusion	?	Unknown whether the site has potential to deliver any affordable units due to unknown site capacity. 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.	0	Site identified for housing only. Site not in former employment uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	No issues:  Development of the site is unlikely to raise issues with the following objectives: biodiversity as no nature conservation designations on or near site, although residential gardens could have some nature conservation interest; open space as the site does not contain any public open space; SDNP due to situation within an urban context; transport due to proximity to sustainable transport and services; air quality as site located outside the AQMA; soil quality as site unlikely to be contaminated; water quality as not within a GSPZ; access and health due to proximity to services and potential for active lifestyles; economy as development would not result in loss of employment land.

	<p>Potential adverse effects:</p> <p>The northern side of the site is opposite a Conservation Area and development could have heritage impacts. Groundwater levels situated between 0.5m-5m below surface which although not in the highest risk category could pose some risk. The site is not within a heat cluster area. Development could result in urbanisation of site which contains a large proportion of undeveloped garden land, potentially impacting on climate change adaptation. Redevelopment of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings.</p> <p>The site capacity is unknown therefore it is unknown whether there would be positive impacts for housing or whether redevelopment would make the best use of land which is in current active use.</p> <p>Potential positive effects:</p> <p>Redevelopment may provide opportunities for nature conservation enhancement and SUDS, which would also support climate change adaptation.</p>
--	---

**SA site assessment: Site 16, Land at and adjoining Horsdean Recreation Ground, Patcham (H2 site)**

<b>Site Description</b>	Publicly accessible designated open space of various typologies including natural/semi-natural, allotments and outdoor sports. Designated Local Wildlife Site. 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>	The site was previously allocated for 25 dwellings in the Proposed Submission City Plan Part Two, April 2020. The Urban Fringe Assessment 2021 did not consider delivery of 25 dwellings achievable on the site. The UFA21 concluded that c.5 dwellings may be able to be delivered on the part of the site previously found to have potential for allocation (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. Updated UFA 2021 did not consider it possible to deliver 25 units on the site without significant loss of habitat that contributes to the LWS and which would affect the integrity of the site.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Site comprises publicly 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 archaeological sites.	--	The area allocated for housing is within the Horsdean ANA. The site is in fairly close proximity to the Patcham Conservation Area which includes various listed buildings. Various Scheduled Monuments within 1000m of the site. The open spaces form an important part of the setting of the Conservation Area.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	+	Good access to a bus service offering regular services. Some services (shops and schools) located within acceptable walking distance. Health services some distance from site.
6. To reduce air and noise pollution.	++/-	Site outside the AQMA and unlikely to generate change in average vehicle flow which would significantly impact upon air quality. Site suffers from road noise from the A27 of between 60-69 dcbls 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	--	<p>Site consists of open spaces which provide greenfield functions. Site situated within flood zone 1.</p> <p>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.</p> <p>Groundwater levels between 0.025m and 5m below surface which poses a high risk of groundwater flooding.</p> <p>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.</p>
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.	+	<p>A housing density of 6dph would be achieved on that part of the site developed if 5 dwellings are delivered. This is much lower than the minimum targets expected through CP14, however takes into consideration the need to reduce other adverse effects such as landscape and ecological impacts. This low density would enable ecosystem services to be retained on the remainder of the site.</p>
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Delivery of 5 dwellings would make a small contribution towards local housing need. 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:</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; 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 on site.</p> <p>Potential adverse effects:</p>

	<p>Development of the site for 25 units could raise issues with biodiversity as concluded in the updated Urban Fringe Assessment 2021. The site allocated for development comprises a LWS and development at this scale would result in loss of habitats that contribute to the LWS as well as impact on the integrity of the site..</p> <p>Development of the site could also raises issues such as loss of open space; landscape due to proximity to SDNP although it is noted that the UFA 2015 concluded that development could be delivered without significant landscape effect on the assumption that vegetated buffers and public access is retained to the north of the site; heritage and archaeology as site within an ANA and is in proximity to various heritage assets (noted that no further archaeological assessment has taken place); water quality as site within GSPZ 2; climate change mitigation as site not within a heat network opportunity area; and climate change adaptation as development would result in urbanisation of parts of a site with natural form. Loss of open space could also impact upon health, although it is recognised that only approximately 7% of the entire urban fringe 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:</p> <p>The UFA21 considered the site could have capacity for c.5 units and would therefore have a positive impacts for housing. The site may also be suitable for family type housing. Delivery of 5 dwellings would only provide a site density of 6dph, however this 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>
--	---

## Appendix E List of sites no longer being allocating

This table lists sites that were allocated in the Proposed Submission City Plan Part Two, April 2020, but are no longer proposed to be allocated

Site name	Policy	Reason for no longer allocating
2-16 Coombe Road, Brighton	H1	Site not available in plan period
87 Preston Road, Brighton	H1	Development underway/complete
George Cooper House, 20-22 Oxford Street, Brighton	H1	Development underway/complete
Whitehawk Clinic, Brighton	H1	Development underway/complete
Buckley Close Garages, Hangleton	H1	Development underway/complete
189 Kingsway, Hove	H1	Development underway/complete
Kings House, Hove	H1	Development underway/complete
Site 16 Horsdean Recreation Ground	H2	Not considered suitable for development
118-132 London Road, Brighton	H3	Development underway/complete



Brighton & Hove  
City Council