

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

# **Sustainability Appraisal Addendum**

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

**February 2022**



**Brighton & Hove  
City Council**

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## **1. Introduction**

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

This document comprises the Sustainability Appraisal Addendum of the proposed modifications 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 modifications to the Submission City Plan Part 2.

This report only considers the proposed main and additional modifications to the City Plan Part 2. This SA 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 CPP2 was submitted for examination in May 2021 and is being examined by Inspector Ms R Barrett, MRTPI IHBC. Examination hearings were held in November 2021. The Inspector advised in her Post Hearing Actions Note (INSP09) that she considered a number of proposed changes/ main modifications to the Plan are necessary to inform her decision on whether the Plan is sound and/or how it could be made sound by Main Modifications (MMs). The Inspector requested that the MMs should be subject to further Sustainability Appraisal and Habitats Regulation Assessment as necessary. The Inspector requested that this SA addendum should be published as part of the MM consultation and the Inspector's final conclusions will be reached taking any representations, including on the SA into account.

### **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

An Interim SA Addendum was produced in May 2021 for the purposes of the examination only, which is now superseded by this Addendum published in 2022.

### **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.

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<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 DM10, DM12, DM13, DM37, DM44, H1, H2, H3 and E1 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 DM10, DM12, DM13, DM37, DM44, H1, H2, H3 and E1 discussed in section 4 where relevant.  Transport related mitigation updated in Section 5 of this report. Mitigation for remaining CPP2 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	A description of alternatives considered leading up to Proposed Submission stage is found within Appendix D. Difficulties encountered are found within Section 2.4	Appendix updated with Proposed Modifications and located in Appendix D of this Addendum.

	technical deficiencies or lack of know-how) encountered in compiling the required information;		
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).	Non-technical summary produced for public consultation.

## 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...)
<b>Environmental</b>	
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>

SA Objective	Decision Making Criteria (Will the objective/option/policy...)
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 wastewater 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 wastewater</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 85 modifications have been proposed, comprised of 49 main modifications and 36 additional modifications. The full wording of all changes can be found in Appendix A (main modifications) and Appendix B (additional modifications).

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 or score, a full re-appraisal of that policy has taken place.

Nine policies were considered to require re-appraisal resulting from the main modifications. None of the additional modifications were found to result in the need of 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 9 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:

- DM10 Public Houses
- DM12 Regional, District, Town and Local Centres
- DM13 Important Local Parades
- DM37 Green Infrastructure and Nature Conservation
- DM44 Energy Efficiency and Renewables
- H1 Housing Sites and Mixed Use Sites
- H2 Housing Sites – Urban Fringe
- H3 Purpose Built Student Accommodation Sites
- E1 Opportunity sites for business and warehouse uses

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

### **4.2 DM10 Policy Re-appraisal**

#### **Summary**

- The policy has the potential to have significantly positive impacts on the objectives relating to access to services and health. The policy will result in the protection of pubs, or provision of community facilities where change of use is allowed and will only allow change of use where the local community no longer needs provision and there is alternative provision locally. This will help to maintain access to these services and can also help to contribute to increasing or maintaining the vitality of the wider area through footfall. The protection of pubs will ensure that there are ongoing opportunities for social and community interaction, supporting general well-being, as well as helping to ensure balanced communities.
- The policy has the potential to have positive impacts on the objectives relating to heritage, reducing the need to travel, making the best use of land, community safety, equalities and economic development. The policy could help to bring vacant sites back into viable uses, potentially having heritage benefits as well as helping to make the best use of existing building stock. The policy should help to protect pubs helping to reduce the need to travel to alternative premises. Pubs provide opportunities for social interaction, benefiting community safety, and where change of use is permitted, this could help to reduce the fear of crime if the site was previously derelict/vacant. Pubs can also provide a venue to deliver services for people with protected characteristics. Finally, pubs provide employment opportunities and can help to increase footfall to an area, having economic benefits. Impacts on heritage and equalities are also uncertain as will depend on the site and the services provided.

#### **Recommendations at Proposed Submission Stage and mitigation**

- There are no recommendations or requirements for mitigation.

### **4.3 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.

#### **4.4 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.

### **4.5 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.

### **4.6 DM44 Policy Re-appraisal**

#### **Overall Summary**

- The policy should have potential for significant positive impacts for the objective for reducing greenhouse gas emissions. The policy would ensure that conversions and change of use and not just new build, would have to meet certain standards in terms of CO2 emissions and also actively encourages incorporation of renewables in certain areas as well as encourages all development to achieve greater reductions from fabric efficiency. This should lead to greater reductions in CO2 emissions from energy consumption.
- The policy was also found to have potential for significant positive impacts for objectives for health, through the health benefits that energy efficient homes have and the potential to reduce the risk of fuel poverty and health inequalities
- The policy was found to have potential for positive impacts for the objective for deprivation, through the potential for the policy to address fuel poverty, which affects people on lower incomes who may also have protected characteristics, and address health inequalities.
- The policy was found to have potential for adverse uncertain impacts on the objective for noise quality, due to the potential for certain types of renewables technologies to generate noise which can affect occupier amenity. There could also be potential adverse effects on the objectives for biodiversity, as some types of renewables can impact upon ecology, and also the SDNP and the historic built environment as the policy encourages renewables infrastructure within urban fringe locations, which are all within the setting of the SDNP, and within Development Areas, some of which have heritage constraints, however, is uncertain as would depend on the type of technology and location.

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

- There are no recommended changes to policy.
- CPP1 policy SA5 Development within the Setting of the SDNP should ensure that development does not have an adverse impact on the setting of the SDNP.
- CPP1 policy CP15 Heritage and emerging CPP2 policies that provide policy on protecting heritage assets and their settings, and policy on design should provide ensure that development does not have an adverse impact on heritage assets.
- Emerging policy on Protection of Environment and Health should address any potential noise impacts.

### **4.7 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 1,231 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, particularly affordable homes have 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 some sites 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

### **4.8 H2 Policy Re-appraisal**

#### **Summary**

- The policy was found to have potential for significant positive impacts for housing as should result in an indicative 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 the have mixed (adverse/positive) impacts for climate change adaptation; adverse impacts reflecting flood risk and the loss of land from a natural to more urbanised form, reducing ecosystem services functions of this land; positive impacts reflecting policy requirements relating to incorporating green infrastructure and that c.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.

### 4.9 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 an indicative 349 bedspaces 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, particularly 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 is 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.

### **4.10 E1 Policy Re-appraisal**

#### **Overall Summary**

- The policy was found to have potential for significant positive impacts for the economic development objective as the policy may help to increase employment land supply in the city and thus contributes towards meeting development needs of various employment sectors.
- The policy was found to have potential for positive impacts for the objectives for waste, making the best use of land, health, and equalities. The policy clearly refers to the need to ensure development does not prejudice any future waste development; the policy could help bring forward development on an un-used piece of land and make better use of the site; the policy could help to increase access to meaningful employment which is a wider determinant of health; employment-based development could help to reduce employment-deprivation through increasing access to opportunities, although would be dependent on take-up by deprived communities.
- The policy was found to have potential for adverse impacts for the objectives for open space, travel, flood risk and climate change adaptation. Open space would be lost through development. The site is likely to be accessed by car due to its location and does not have particularly safe access to public transport. The site could be at risk of groundwater emergence. Development of the site is likely to result in loss of green infrastructure, which would otherwise contribute to adapting to climate change through absorption of water and temperature regulation.
- The policy was found to have mixed impacts for the biodiversity, SDNP and air/noise quality objectives. The site comprises open space or a greenfield nature, is adjacent the SDNP, and is adjacent to and includes part of two LWS, which could be adversely affected by development, although noted that the supporting text acknowledges this. The site is outside the AQMA, however without knowing the amounts of development to be delivered it is difficult to gauge whether there would be a significant increase in vehicle movements and whether this would adversely affect air quality. The site suffers from high levels of road

noise, however this may make it more suitable for some employment uses, which could be noisy and therefore less compatible with other uses, for example housing.

### **Mitigation**

- Development could result in losses in biodiversity. CPP1 CP10 should provide mitigation and ensure any development results in net gains in biodiversity.
- The site has landscape sensitivities due to proximity to the SDNP. Mitigation provided by CPP1 SA5 and CP15 which requires development to be consistent with the purposes of the National Park and avoid significant harm.
- New development in this location will increase vehicle movements in this location, particularly as public transport access is poor. A Transport Assessment would need to be submitted as part of a planning application to fully assess the impacts of development. Other adopted policy would apply, including CP9 Sustainable Transport and SPD14 Parking Standards which should help to ensure an appropriate amount of parking is provided in relation to the site's location. This should help to minimise any adverse transport impact.
- As above, it is unknown whether the increase in transport movements would exceed the amount over which there could be significant impacts on air quality. In addition to transport mitigation, emerging CPP2 policy should address air quality issues.
- Development could result in loss of land which provides natural functions and may help with climate change adaptation. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this. CPP1 CP10 requires net gains in biodiversity to be delivered, which could include green infrastructure.

### **Recommendations at Proposed Submission Stage**

- There are no recommended changes.

## 5. City Plan Part Two Mitigation

No additional mitigation is proposed as a result of the Proposed Modifications. Mitigation relating to the transport SA objective has been updated to reflect ongoing work with National Highways. Overarching mitigation measures for the remainder of CPP2 are set out in Section 7 of the Proposed Submission Sustainability Appraisal, April 2020.

SA Objective	Impact	Mitigation
Travel by car / transport	New employment floorspace could increase transport movements.	<ul style="list-style-type: none"> <li>• CPP1 Spatial Strategy directs the majority of development to areas within the city which benefit from existing sustainable transport provision.</li> <li>• CPP1 CP9 Sustainable Transport sets the strategy relating to promoting sustainable travel.</li> <li>• CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised.</li> <li>• CPP2 DM35 requires larger developments to submit a transport assessment which also considers cumulative impacts from other developments and required development to help minimise the use of private car.</li> <li>• CPP2 DM34 requires consideration of impacts on traffic flows and city centre parking provision.</li> <li>• Strategic site allocation policies all require sustainable transport infrastructure improvements.</li> <li>• Revised designs of A27 truck road junctions to ensure their safe operation agreed through the Statement of Common Ground with National Highways.</li> </ul>
	Development within the seafront could increase attractiveness of the area and add to existing congestion issues.	
	Park & Ride schemes may lead to displacement rather than reduction in car movements	
	New housing development could increase transport movements, particularly sites which do not have good access to services.	

## 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 50 additional sites/site clusters within the built-up area and on the urban fringe being allocated for housing development including PBSA.

#### 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 Submission City Plan Part Two (with proposed modifications) 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 modifications 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**

This SA Addendum will be available for consultation alongside the proposed modifications. Any representations received will be sent to the Inspector for their consideration.

## Appendix A Screening of Proposed Main Changes

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
MM01	Policy DM1 Page 13	<p><b><i>DM1 Housing Quality, Choice and Mix</i></b> <i>Amend policy criterion e) to read:</i></p> <p>e) for proposals providing 10 or more dwellings, 10% of the affordable residential units and 5% of all the residential units should be suitable for occupation by a wheelchair user in accordance with Building Regulation M4(3)<sup>9</sup>. <u>Where the Council is responsible for allocating or nominating the occupier, these homes should be ‘wheelchair accessible’ at the point of completion, whilst in other cases they may be ‘wheelchair adaptable’.</u> Where this is not practicable on-site an equivalent financial contribution should be provided<sup>10</sup>; and</p> <p><sup>9</sup> Building Regulations M4(3) or as amended. <sup>10</sup> PartM4(3) - the extra cost per dwelling to provide was assessed in the CIL Viability Study (2017) to be £26,816 for houses and £15,691 for flats. These figures will form the basis for any financial contribution for off-site provision, taking into account inflation. The council will publish updated Technical Guidance on Developer Contributions following the introduction of CIL.</p>	<p>The proposed amendments reflect Part M4(3) of the Building Regulations and Planning Practice Guidance on Housing: Optional Technical Standards (paragraph 56-009) and provide further clarity to policy criterion e). The previous SA assessment found the policy to have significant positive impacts for objectives 14 and 16 relating to housing and health, and positive impacts for objective 18 relating to equalities, as it should result in the delivery of accessible and adaptable homes for people with protected characteristics, including older and disabled persons. The proposed changes add further clarity 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>
MM02	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>	<p>A factual amendment not within the policy. No SA implications.</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
	Policy DM3, page 20	<p><b><i>DM3 Residential conversions and the retention of smaller dwellings</i></b>  <i>In part B, insert footnote after 'minimum of two bedrooms' to read:</i></p> <p><i>*i.e., a 2-bedroom, 4-person unit (70sqm) or larger.</i></p>	A factual amendment. No SA implications.
MM03	Policy DM4, page 23	<p><b><i>Policy DM4 Housing and Accommodation for Older Persons</i></b>  <i>Amend second paragraph to read:</i></p> <p><del>Development proposals to meet the specific accommodation needs of older people will be supported</del> <u>Planning permission will be granted for older persons housing and accommodation where the development meets all of the following criteria:</u></p>	<p>The previous SA assessment found the policy to have potential for significant positive effects for objectives 14 and 16 relating to housing and health, and objective 18 relating to equalities. The proposed change to the policy wording is considered to strengthen the policy in relation to these objectives by making it clearer and unambiguous 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>
	Policy DM4, page 23	<p><b><i>Policy DM4 Housing and Accommodation for Older Persons</i></b>  <i>Amend fourth paragraph to read:</i></p> <p>Proposals that will result in the loss of residential accommodation for older people will <del>be resisted unless it can be</del> <u>only be permitted</u> where it is demonstrated that at least one of the following criteria apply:</p>	See commentary as above for DM4. No additional SA assessment of this policy is considered necessary.
	Supporting text to Policy DM4, paragraph 2.28, page 25	<p><b><i>DM4 Housing and Accommodation for Older Persons</i></b>  <i>Amend paragraph 2.28, third sentence to read:</i></p> <p>The availability of a range of suitable accommodation options for older people, <u>including as part of inter-generational communities</u>, can help release family accommodation, improve quality of life and reduce the need for residential care.</p>	This proposed change is in the supporting text, and it provides support for the principle of intergenerational housing. The proposed addition is considered to strengthen the policy but is not considered to change the results of the previous SA assessment.

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			No additional SA assessment of this policy is considered necessary.
	Supporting text to DM4 Paragraph 2.36 page 36	<p><b>DM4 Housing and Accommodation for Older Persons</b>  Amend the final sentence in the fourth bullet point in paragraph 2.36 to read:</p> <p>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></p>	A factual/editorial amendment not within the policy. No SA implications.
MM04	Policy DM5, page 28	<p><b>Policy DM5 Supported Accommodation (Specialist and Vulnerable Needs)</b>  Amend second paragraph to read:</p> <p><del>Proposals for development aimed to meet the specific accommodation requirements of people with specialist needs will be permitted</del> <u>Planning permission will be granted for supported accommodation for people with specialist and vulnerable needs where the development meets all of the following criteria:</u></p>	<p>The previous SA assessment found the policy to have potential for significant positive effects for objectives 14 and 16 relating to housing and health, and objective 18 relating to equalities. The proposed change to the policy wording is considered to strengthen the policy in relation to these objectives by making it clearer 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>
	Policy DM5, page 28	<p><b>Policy DM5 Supported Accommodation (Specialist and Vulnerable Needs)</b>  Amend third paragraph to read:</p> <p>Proposals that will result in the loss of residential accommodation for people with special needs will <del>be resisted unless it can be</del> <u>only be permitted where it is demonstrated that at least one of the following criteria apply:</u></p>	See commentary as above for DM5. No additional SA assessment of this policy is considered necessary.
MM05	Supporting text to Policy DM8,	<p><b>DM8 Purpose Built Student Accommodation</b>  Amend last sentence of paragraph 2.76:</p>	These proposed changes are in the supporting text. It provides further clarity on the meaning of the policy requirement for predominately cluster units, and to

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
	paragraph 2.77	<p>In order to provide a greater strategic benefit to the city developments should provide a <del>predominance</del> <u>at least 50% of bedspaces in the form</u> of cluster flats in order to be available to a broad spectrum of students, rather than only the wealthiest.</p> <p><i>Delete the following text in paragraph 2.77:</i></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>	<p>reflect the council no longer using planning conditions to restrict access to parking permits. The previous SA assessment found the policy to have potential for significant positive effects for objectives 5 and 6 relating to transport and air quality, and objective 16 relating to housing. The proposed change to the policy wording is considered to strengthen the policy in relation to these objectives by making it clearer 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>
MM06	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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<p>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>
MM07	Supporting text to Policy DM9, paragraph 2.79 pages 40 - 41	<p><b>DM9 Community Facilities</b>  <i>Amend the bullet points in paragraph 2.79 to read:</i></p> <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/creches, law courts, training centres, museums, public libraries, public halls and places of worship;</u></li> </ul>	<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> <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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<ul style="list-style-type: none"> <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 venues, bingo halls, and sport facilities. These types of venue are already protected by City Plan Part One Policy CP5.</u></li> <li>• <u>Public houses. These are protected by Policy DM10.</u></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>	<p>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.</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			No additional SA assessment of this policy is considered necessary.
MM08	Policy DM10, page 42	<p><b>DM10 Public Houses</b>  <i>Amend sentence of policy as follows:</i></p> <p>Public houses will be protected.</p> <p><u>1. Planning permission will not be granted for development that would result in the loss of a pub redevelopment and/or change of use except where:</u></p> <p>a) it has been demonstrated that use as a public house is not economically viable now and could not be made viable in the future<sup>38</sup>; and</p> <p>b) It has been demonstrated that the local community no longer needs the public house and alternative provision meeting a similar need is available in the locality.</p>	Although the proposed changes to the entire policy are unlikely to change the findings of the previous SA assessment, particularly in relation to relevant objectives 15 (access to services), 16 (health) and 19 (economic development), full SA assessment of policy DM10 will be undertaken due to the additional policy requirement (2) proposed.
	Policy DM10, page 42	<p><b>DM10 Public Houses</b>  <i>Insert new Part 2:</i></p> <p><u>2. Proposals involving the loss of floorspace (including external areas) and facilities ancillary to the operation of the public house, will not be supported where the operation or customer appeal of the public house will be adversely affected.</u></p> <p>Where an alternative use can be justified, priority will be given to re-use of the premises or site for alternative community facilities.</p>	See commentary above for DM10.
	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>	See commentary above for DM10.

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
	Supporting Text to Policy DM10, para. 2.93, page 44	<p><b>DM10 Public Houses</b>  <i>Insert new paragraph after 2.93:</i></p> <p><u>The partial loss of a public house including ancillary facilities such as outdoor amenity spaces, covered shelters, dining areas, gardens and visitor accommodation can be detrimental to character, attractiveness to customers and consequently future viability, potentially leading to a pub being lost altogether. In determining whether the proposed changes are acceptable, the Council will consider the likely effect on the public house’s continuing ability to operate successfully and to attract customers.</u></p>	See commentary above for DM10.
MM09	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 configuration for new <del>B1</del> <u>E(g)</u> uses and activities; and for new <del>B1c</del> <u>E(g) (iii)</u> 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>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 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>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			No additional SA assessment of this policy is considered necessary.
	Supporting text to Policy DM11, pages 45 - 47	<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> <p><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> <p><i>Amend paragraph 2.100, first sentence to read:</i></p> <p>Proposals that provide mix of <del>B-E(g)</del>, <u>B2</u> and <u>B8</u> use class employment uses must be designed to demonstrate there is adequate separation of uses, to ensure high standards of amenity.  <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>, <u>B2</u> and <u>B8</u> uses making efficient use...</p>	See commentary as above for DM11. No additional SA assessment of this policy is considered necessary.
MM10	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>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</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>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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<p>A) Regional, Town and District Shopping Centres</p> <ul style="list-style-type: none"> <li>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 total Primary Shopping Frontage), taking into account unimplemented planning permissions for changes of use;</li> <li>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.</li> <li>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.</li> <li>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</li> <li>v) — A shop front has been retained or provided;</li> </ul> <p>B) Local Shopping Centres</p> <ul style="list-style-type: none"> <li>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 unimplemented planning permission for changes of use;</li> <li>ii) — 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</li> <li>iii) — A shop front has been retained or provided.</li> </ul>	<p>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>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<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> <ol style="list-style-type: none"> <li>1. <u>Proposals for other uses will be permitted where it can be demonstrated that the scheme meets all of the following criteria:</u> <ol 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> <li>d) <u>Shop front design should be in accordance with the council's shop front policy (see DM23).</u></li> </ol> </li> <li>2. <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></li> <li>3. 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.</li> <li>4. 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 supported</del> <u>supported</u> particularly where they help activate and revitalise <del>retail</del> <u>retail</u> centres <u>and can generate increased footfall.</u></li> </ol> <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>	

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<p>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>Temporary and ‘meanwhile’ use of vacant buildings and sites by start-up businesses as well as creative, cultural and community organisations will be considered particularly where they help activate and revitalise retail centres.</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> <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 Trafdmalgar Street.</u></p>	
	Supporting text to Policy DM12, pages 49-52	<p><b>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</b>  <i>Amend Policy DM12 supporting text paragraphs 2.103 – 2.121 to read:</i></p> <p><b>Review of and designation of shopping frontages</b></p> <p><del>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.</del></p> <p><u>2.103 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>	See commentary as above for DM12. No additional SA assessment of this policy is considered necessary.

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<p><u>2.104 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> <p><u>2.105 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 accordance 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>2.106 Appropriate alternative uses which could contribute to vitality and viability may include sui generis uses such as launderettes, takeaways, pubs, bars, and cinemas which help generate footfall to an area.</u></p> <p><b><u>Proposals within the Regional Centre</u></b></p> <p><u>2.107 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>2.108 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> <p><u>2.109 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 Laine as well as the supply of</u></p>	

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<p><u>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><b><u>Primary Shopping Area</u></b></p> <p><u>2.110 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>2.111 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 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>	

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		<p><b>Primary Shopping Area</b>  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.</p> <p><b>Primary and Secondary Frontages</b>  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> <p>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>	

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		<p><b>Local Centres</b></p> <p>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><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="405 571 1532 1402"> <thead> <tr> <th data-bbox="405 571 685 671">Centre Definition</th> <th data-bbox="685 571 1229 671">Defined Centres</th> <th data-bbox="1229 571 1532 671">Linked City Plan Part 1 Policies</th> </tr> </thead> <tbody> <tr> <td data-bbox="405 671 685 735">Regional Centre</td> <td data-bbox="685 671 1229 735">Brighton</td> <td data-bbox="1229 671 1532 735">DA1, SA2, CP4</td> </tr> <tr> <td data-bbox="405 735 685 858" rowspan="2">Town Centres</td> <td data-bbox="685 735 1229 799">Hove</td> <td data-bbox="1229 735 1532 799">CP4</td> </tr> <tr> <td data-bbox="685 799 1229 858">London Road</td> <td data-bbox="1229 799 1532 858">DA4, CP4</td> </tr> <tr> <td data-bbox="405 858 685 1042" rowspan="3">District Centres</td> <td data-bbox="685 858 1229 922">St James’s Street</td> <td data-bbox="1229 858 1532 922">CP4</td> </tr> <tr> <td data-bbox="685 922 1229 986">Lewes Road</td> <td data-bbox="1229 922 1532 986">DA3, CP4</td> </tr> <tr> <td data-bbox="685 986 1229 1042">Boundary Road/Station Road</td> <td data-bbox="1229 986 1532 1042">DA8, CP4</td> </tr> <tr> <td data-bbox="405 1042 685 1402">Local Centres</td> <td data-bbox="685 1042 1229 1402">           Mill Lane, Portslade            Portland Road, Hove            ‘The Grenadier’, Hangleton Road            Richardson Road, Hove            Eldred Avenue, Withdean            Old London Road, Patcham         </td> <td data-bbox="1229 1042 1532 1402">           SA6, CP4            (all centres)         </td> </tr> </tbody> </table>	Centre Definition	Defined Centres	Linked City Plan Part 1 Policies	Regional Centre	Brighton	DA1, SA2, CP4	Town Centres	Hove	CP4	London Road	DA4, CP4	District Centres	St James’s Street	CP4	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	SA6, CP4 (all centres)	
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			<p>Ladies Mile Road, Patcham</p> <p>Seven Dials</p> <p>Fiveways</p> <p>Hollingbury Place, Hollingdean</p> <p>Beaconsfield Road, Preston Park</p> <p>St George's Road, Kemptown</p> <p>Warren Way, Woodingdean</p> <p>Whitehawk Road, Whitehawk</p> <p>High Street, Rottingdean</p> <p>Lustrell's Vale, Saltdean</p> <p>Longridge Avenue, Saltdean</p> <p>Brunswick Town</p>	
		<p><b>Implementation and Monitoring</b></p> <p>2.1124 <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</del></p>		

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		<p>retail frontage within that boundary. Any forthcoming changes will be undertaken in any review of the City Plan Part One.</p> <p>2.115 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.</p> <p><b>Evidence of Marketing</b></p> <p>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.</p> <p><b>Permitted Development Rights</b></p> <p>2.1137 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.</p> <p>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.</p> <p><b>New Development in Centres</b></p> <p>2.1149 The policy will be applied to new units that are constructed within designated frontages or where they form a logical extension to an existing frontage. Due to the predominance of larger units</p>	

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		<p><u>in the Primary Frontages, proposals for larger format retail will generally be suited to these defined areas.</u></p> <p><del>2.11520</del> 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><del>2.11624</del> 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>	
MM11	Policy DM13, page 53	<p><b><i>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</i></b>  <i>Amend Policy DM13 to read:</i></p> <p><b><i>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</i></b></p> <p><del>A) Important Local Parades</del></p> <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> </ul>	<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 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</p>

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		<ul style="list-style-type: none"> <li>• Preston Drive, 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> <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 an active ground floor use 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> <li>d) <u>Shopfront design should be in accordance with the council’s shop front policy (DM23).</u></li> </ul> <p><del>In Important Local Parades, changes of use involving the loss of units in A1 use class, will be permitted where;</del></p> <ul style="list-style-type: none"> <li><del>a) The proposal would not result in the number of units in class A1 use falling below 50%; and</del></li> <li><del>b) 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>has strengthened 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>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<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> <u>supported</u> where they help activate and revitalise retail centres <u>parades and can generate increased footfall.</u></p> <p><del>B) 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> <p><del>a) There are alternative shopping facilities within reasonable walking distance (300 metres);</del></p> <p><del>b) The shop unit has been marketed for a minimum of one year;</del></p> <p><sup>1</sup> As designated on the Policies Map.</p>	
	<p>Supporting text to Policy DM13, pages 54-55</p>	<p><b><i>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</i></b>  <i>Amend Policy DM13 supporting text paragraphs 2.122 2.129 to read:</i></p> <p>2.122 The term ‘Important Local Parades (ILPs)’ as defined on the Policies Map refers to a group of shops (<del>five-six</del> 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.</u> Access to these local facilities have become more important <u>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. ILP’s tend to be characterised as areas of smaller shops with traditional shopfronts, offering a range of services, located in close proximity to residential neighbourhoods.</u></p> <p><u>2.123 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>See commentary as above for DM13. No additional SA assessment of this policy is considered necessary.</p>

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		<p><u>2.124 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. Where appropriate proposals should be in accordance 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 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</p>	

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		<p>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 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>	
MM12	Policy DM14, page 56	<p><b><i>DM14 Commercial and Leisure Uses at Brighton Marina</i></b>  <i>Amend Policy DM14 to read:</i></p>	Proposed changes to DM14 have been made to reflect changes to the use class order and to align with other policies in relation to this. The SA does not assess the

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		<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 maintain and enhance the <del>special commercial</del> <u>existing commercial</u> 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>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. 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>
	Supporting text to Policy DM14, page 56	<p><b><i>DM14 Commercial and Leisure Uses at Brighton Marina</i></b>  <i>Amend supporting text paragraphs 2.130 -2.132 to read:</i></p> <p>2.130 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</p>	See commentary as above for DM14. No additional SA assessment of this policy is considered necessary.

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		<p>addition to <del>being performing as</del> a working harbour. This creates a unique commercial and leisure environment.</p> <p>2.131 The majority of existing retail activity takes place in the Merchant's Quay /Marina Square, <u>the Waterfront</u> and at the <del>ASDA</del> 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 Framework<sup>1</sup>.</p> <p>2.132 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 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>	
MM13	Policy 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</u>, food and drink <u>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)</u> <u>will be permitted</u> on the lower promenade, Madeira Drive and within the seafront arches, <del>will be permitted</del> provided that all of the following criteria are met;</p>	<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</p>

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		<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> <li>c) The proposal will support the role of the seafront as recreation and tourist destination helping to extend footfall and reduce seasonality; and</li> <li>d) The proposed development or uses will not have a harmful impact on <del>the amenity of local residents, visitors and the seafront</del> due to noise, odour, disturbance <del>and</del> <u>or</u> light pollution</li> </ul>	<p>(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> <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>
	Supporting text to Policy DM15, page 57	<p><b>DM15 Commercial and Leisure Uses on the Seafront</b> Amend the supporting text at paragraph 2.133 and 2.134 to read:</p> <p>2.133 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’,</p>	See commentary as above for DM15. No additional SA assessment of this policy is considered necessary.

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		<p>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>2.134 Any <u>temporary</u> use extending for more than <u>the time allowed under permitted development rights 28 days</u> (consecutively or in a single year) requires planning permission. Interim or 'meanwhile' uses such as pop-up cafés, 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.</p>	
MM14	Policy DM18 page 63	<p><b><i>Policy DM18 High quality design and places</i></b>  <i>Amend the first sentence of the policy to read:</i></p> <p><del>Planning permission will be granted for development proposals that demonstrate</del> <del>Development proposals must demonstrate</del> a high standard of design and make a positive contribution to a sense of place and the visual quality of the environment. The council will require an integrated approach to the design process from project inception where place making and sustainable development, including the principles of the circular economy, are considered as one.</p>	<p>The previous SA assessment found the policy to have potential for significant positive effects for objective 4 relating to heritage and townscape. The proposed change to the policy wording is considered to strengthen the policy in relation to this objective by making it clearer and unambiguous 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>
	Policy DM18 page 63	<p><b><i>Policy DM18 High quality design and places</i></b>  <i>Amend the last sentence of the policy to read:</i></p>	<p>See commentary as above for DM18.</p>

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		In addition to the above, major development proposals on strategic and/or prominent sites <del>should also consider</del> that are likely to have an impact on public realm are required to incorporate the <del>incorporation of</del> an artistic element.	
	Supporting text to Policy DM18, para 2.147, page 63	<p><b>Policy DM18 High quality design and places</b>  <i>Amend the supporting text at paragraph 2.147 to read:</i></p> <p>More detailed design guidance for developers, including area- and site-specific design principles, <del>will form part of the</del> are set out in the National Design Guide, SPD17 Urban Design Framework <del>Supplementary Planning Document</del> and future design codes the council will bring forward to which <del>will support</del> City Plan Part 1 Policies CP12 Urban Design and <del>City Plan Part 2 Policy DM18 High Quality Design and Places</del>. Guidance on identified strategic views and how new strategic and local views can be identified <del>will be</del> is included in <u>SPD17</u>.</p>	A factual amendment not within the policy. No SA implications.
	Supporting text to Policy DM18, paragraph 2.148 page 64	<p><b>DM18 High Quality Design and Places</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>

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	Supporting text to Policy DM18, para 2.149, page 64.	<p><b>DM18 High Quality Design and Places</b>  <i>Amend the last sentence of the supporting text at paragraph 2.149 to read:</i></p> <p>Criteria for assessing proposals for tall buildings, including cumulative impact <del>will be</del> set out in <del>the SPD17</del> Urban Design Framework <del>SPD</del>.</p>	A factual amendment not within the policy. No SA implications.
	Supporting text to Policy DM18, paragraph 2.156 page 66	<p><b>DM18 High Quality Design and Places</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 considered to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	Supporting text to Policy DM18, paragraph 2.158 page 66	<p><b>DM18 High Quality Design and Places</b>  <i>Amend the supporting text at paragraph 2.158:</i></p> <p><u>The council's vision for public art in the city is set out in the Public Art Strategy. Proposals for major applications on strategic or prominent sites or development that <del>is</del> are likely to have an impact on the public realm will need to demonstrate how they have had regard to the objectives of 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.

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			No additional SA assessment of this policy is considered necessary.
MM15	Policy DM20, page 69	<p><b>DM20 Protection of Amenity</b>  <i>Amend the policy to read:</i></p> <p>Planning permission for development including change of use will be granted where it would not cause unacceptable loss of amenity to the proposed, existing <del>and/or</del> adjacent <u>or nearby</u> users, residents, occupiers or where it is not liable to be detrimental to human health.</p>	<p>The proposed changes to the policy wording are to capture the full range of harms that can arise to those adjacent and nearby. The previous SA assessment found the policy to have potential for significant positive effects for objective 16 (health). The proposed changes add further clarity 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>
	Supporting text to Policy DM20, para 2.169, page 70	<p><b>DM20 Protection of Amenity</b>  <i>Amend the supporting text at paragraph 2.169:</i></p> <p>Further guidance <del>will be</del> <u>is</u> provided in the SPD17 Urban Design Framework. <del>Supplementary Planning Document (UDF SPD<sup>49</sup>)</del></p>	A factual amendment not within the policy. No SA implications.
	Footnote 29, page 70	<p><b>DM20 Protection of Amenity</b>  <i>Delete footnote:</i></p> <p><sup>49</sup> <del>A draft version of the Urban Design Framework is currently being prepared and adoption is anticipated in 2020.</del></p>	A factual amendment not within the policy. No SA implications.
MM16	Policy DM22 page 72	<p><b>Policy DM22 Landscape Design and Trees</b>  <i>Amend (d) and (e) of policy to read:</i></p> <p>d) the retention of existing trees and hedgerows with details <u>provided</u> of appropriate protection during construction.</p>	The proposed changes to the policy wording are to improve effectiveness however, does not change the meaning of the policy. The previous SA assessment

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		<p><u>e) Where removal of a tree is unavoidable, for example by reason of it being severely diseased or dangerous:</u></p> <p>(i) the provision of plans <u>is required</u> that clearly identify the location and species of all those to be lost and all those to be retained; <u>and</u></p> <p>(ii) <del>e)-replacement trees along with appropriate associated planting space and works of a type of tree, size and location to the satisfaction of the council for any tree felled; for example by reason of it being severely diseased or dangerous.</del></p>	<p>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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	<p>Policy DM22 page 73</p>	<p><b><i>DM22 Landscape Design and Trees</i></b></p> <p><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></p> <p><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 63 of the NPPF (2021).</u></p>	<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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	<p>Supporting text to</p>	<p><b><i>Policy DM22 Landscape Design and Trees</i></b></p> <p><i>Amend final sentence of paragraph 2.175 of supporting text to read:</i></p>	<p>This proposed change is in the supporting text. The previous SA assessment found</p>

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	policy DM22 para. 2.175 page 74	Early consideration ensures advantage of the ‘additional’ opportunities landscape, <u>trees and planting</u> provides can be taken, such as, climate change mitigation and resilience, water purification, air pollution mitigation...	<p>the policy to have potential for significant positive effects for objectives 1 (biodiversity), 6 (air quality), 7 (water quality), 8 (flood risk) and 10 (climate change adaptation). The proposed changes add further clarity to the additional benefits provided by landscaping, trees and planting and therefore strengthens the policy in relation to these SA objectives but 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>
	Supporting text to Policy DM22 para. 2.177 page 74	<p><b><i>DM22 Landscape Design and Trees</i></b></p> <p><i>Amend paragraph 2.177, after fifth sentence to read:</i></p> <p>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></p>	<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 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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	Supporting text to DM22	<p><b><i>DM22 Landscape Design and Trees</i></b></p> <p><i>Amend paragraph 2.178 to read:</i></p>	<p>This proposed change is in the supporting text. It provides further detail in relation effective use of landscaping and the</p>

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	para. 2.178 page 74	<p>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></p>	<p>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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	Supporting text to DM22, para. 2.179 page 75	<p><b><i>Policy DM22 Landscape Design and Trees</i></b>  <i>Amend paragraph 2.179 of supporting text to read:</i></p> <p>...provide shelter; <u>support climate change mitigation and resilience</u>; and can help to reduce noise and atmospheric pollution.</p>	<p>This proposed change is in the supporting text. The previous SA assessment found the policy to have potential for significant positive effects for objective 10 (climate change). The proposed changes add further clarity 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>

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	Supporting text to DM22, para. 2.180 page 75	<p><b>DM22 Landscape Design and Trees</b></p> <p>At the end of supporting text paragraph 2.180 add the following:</p> <p>Proposals will be expected to have taken into account the guidance provided in <u>SPD06 Trees and Development Sites</u>.</p>	A factual amendment not within the policy. No SA implications.
	Supporting text to Policy DM22 para. 2.184 page 76	<p><b>DM22 Landscape Design and Trees</b></p> <p><i>Amend penultimate sentence of paragraph 2.184 to read:</i></p> <p>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>.</p>	<p>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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
MM17	Policy DM25 Page 81	<p><b>Policy DM25 Communications Infrastructure</b></p> <p><i>Amend criterion b) to read</i></p> <p>b) The significance, <del>appearance, character and setting</del> of heritage assets <u>and their settings</u> are conserved or enhanced, in accordance with City Plan Part One Policy CP15 Heritage;</p>	<p>The previous SA assessment found the policy to have potential for significant positive effects for objective 4 relating to heritage. The proposed change to the policy wording is considered to strengthen the policy in relation to this objective by making it clearer, 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>
	Policy DM25 page 81	<p><b>Policy DM25 Communications Infrastructure</b></p> <p><i>Amend last two paragraphs of policy to read:</i></p>	See commentary as above for DM25

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		<p>New development or major renovation works to existing buildings should <del>ensure that</del> <u>provide</u> sufficient ducting space for future digital full fibre connectivity infrastructure <del>is provided</del> as part of the development.</p> <p>Where <del>possible</del> <u>feasible</u>, the council will encourage the removal of older communication equipment that is no longer required <u>should be removed</u> in order to minimise visual impact.</p>	
MM18	Policy DM26, page 85	<p><b><i>Policy DM26 Conservation Areas</i></b>  <i>Amend policy by adding a new paragraph after the list of criteria as follows:</i></p> <p><u>Where either substantial harm or less than substantial harm is identified, the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the conservation area/s affected.</u></p>	<p>This proposed change is an addition to the policy criteria. It provides further clarity in relation to the preservation and enhancement of conservation areas as set out in the NPPF. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the NPPF 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>
	Supporting text to policy DM26, page 85	<p><b><i>Policy DM26 Conservation Areas</i></b>  <i>Amend paragraph 2.208 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	<p>This proposed change is in the supporting text. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the site allocation policies in relation to this SA objective but are not considered</p>

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			<p>to change the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
MM19	Policy DM27, page 86	<p><b>Policy DM27 Listed Buildings</b>  <i>Amend the policy by adding the following new paragraph after the list of criteria:</i></p> <p><u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the listed building/s affected.</u></p>	<p>This proposed change is an addition to the policy criteria. It provides further clarity in relation to the conservation and protection of listed buildings as set out in the NPPF. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the NPPF 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>
	Supporting text to policy DM27, page 86	<p><b>Policy DM27 Listed Buildings</b>  <i>Amend paragraph 2.213 of the supporting text to state as follows:</i></p> <p>There is a general presumption in favour of the preservation of listed buildings. <del>Where substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF.</del> Any substantial public benefits put forward <u>to be balanced against substantial harm</u> must directly relate to the development itself, must benefit the local community in the long term and must not otherwise be achievable.</p>	See commentary above for DM27.
	Supporting text to policy	<p><b>Policy DM27 Listed Buildings</b>  <i>Amend paragraph 2.218 of the supporting text to add a final sentence as follows:</i></p>	This proposed change is in the supporting text. The previous SA assessment found the policy to have potential for significant

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	DM27, page 87	<p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	<p>positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the site allocation policies 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>
MM20	Policy DM28, page 88	<p><b><i>Policy DM28 Locally Listed Heritage Assets</i></b>  <i>Amend the 2<sup>nd</sup> paragraph of the policy to read:</i></p> <p>Alterations and extensions to a locally listed heritage asset, or new development within its curtilage, should be of a high standard of design that respects the special interest of the asset as set out in the <u>Local List entry (or as otherwise identified within a submitted Statement of Heritage Significance)</u> <del>(or, where not included, within a submitted heritage statement.</del></p>	<p>This proposed change to the policy wording provides further clarity in respect of potential non-designated heritage assets identified during the application or pre-application process. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency 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>
	Supporting text to policy DM28, page 88	<p><b><i>Policy DM28 Locally Listed Heritage Assets</i></b>  <i>Amend paragraph 2.221 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	<p>This proposed change is in the supporting text. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency</p>

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			<p>with the site allocation policies 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>
MM21	Policy DM29, page 89	<p><b>Policy DM29 The Setting of Heritage Assets</b>  <i>Amend the policy by adding the following new paragraph after the list of criteria:</i></p> <p><u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the heritage asset/s affected.</u></p>	<p>This proposed change is an addition to the policy criteria. It provides further clarity in relation to the protection of the setting of heritage assets as set out in the NPPF. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the NPPF 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>
	Policy DM29, page 89	<p><b>Policy DM29 The Setting of Heritage Assets</b>  <i>Amend the last paragraph of the policy to read:</i></p> <p>Opportunities should be taken to enhance the setting of a heritage asset through new development. Where a major development impacts on the settings of multiple heritage assets, <u>the scale of impact should be assessed against the importance of the heritage asset and the degree to which setting contributes to its significance</u> <del>priority should be given to enhancing the setting of the asset(s) of greatest significance.</del></p>	See commentary above for DM29.

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	Supporting text to Policy DM29, para. 2.227 page 89	<p><b>Policy DM29 The Setting of Heritage Assets</b>  <i>Amend the first sentence of paragraph 2.227 of the supporting text to read:</i></p> <p><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 of both townscape/urban design and of the character and appearance of conservation areas. This policy does not therefore 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>
	Supporting text to policy DM29, page 90	<p><b>Policy DM29 The Setting of Heritage Assets</b>  <i>Amend paragraph 2.228 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	<p>This proposed change is in the supporting text. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the site allocation policies 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>

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MM22	Policy DM30, page 91	<p><b>Policy DM30 Registered Parks and Gardens</b>  <i>Amend the second sentence of the first paragraph of policy to read:</i></p> <p>In assessing <del>this</del> <u>the</u> impact of such proposals on the significance of the park or garden, the council will have particular regard to the impact of <u>development</u> 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 Parks or Gardens. 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>
	Policy DM30, page 91	<p><b>Policy DM30 Registered Parks and Gardens</b>  <i>Amend the first sentence of the current second paragraph of policy to read:</i></p> <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>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 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</p>

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			objective but are not considered to change the results of the previous SA assessment. No additional SA assessment of this policy is considered necessary.
	Policy DM30, page 91	<p><b>Policy DM30 Registered Parks and Gardens</b>  <i>Amend the policy by inserting a new 2<sup>nd</sup> paragraph as follows:</i></p> <p><u>Where either substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF, having regard to the significance of the parks/s and garden/s affected.</u></p>	<p>This proposed change is an addition to the policy criteria. It provides further clarity in relation to the preservation and enhancement of registered parks and gardens as set out in the NPPF. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the NPPF 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>
	Supporting text to policy DM30, page 91	<p><b>Policy DM30 Registered Parks and Gardens</b>  <i>Amend paragraph 2.234 of the supporting text to add a final sentence as follows:</i></p> <p><u>Where appropriate, having regard to the scale of the development and the extent and importance of the heritage asset(s), a Heritage Impact Assessment will be required with an application. This should have regard to the Historic England guidance on 'Statements of Heritage Significance'.</u></p>	<p>This proposed change is in the supporting text. The previous SA assessment found the policy to have potential for significant positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the site allocation policies in relation to this SA objective but are not considered to change the results of the previous SA assessment.</p>

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	Supporting Text to Policy DM30, page 91	<p><b>Policy DM30 Registered Parks and Gardens</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>No additional SA assessment of this policy is considered necessary.</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.</p> <p>No additional SA assessment of this policy is considered necessary</p>
<b>MM23</b>	Policy DM31 page 93	<p><b>Policy DM31 Archaeological Interest</b>  <i>Amend the first sentence of the fourth paragraph of the 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>
	Supporting text to Policy DM31, page 93	<p><b>Policy DM31 Archaeological Interest</b>  <i>Amend paragraph 2.237 of the supporting text to read:</i></p> <p>Archaeological remains are finite and irreplaceable resources which are particularly vulnerable to the effects of new development. Archaeological interest is defined in the NPPF. <u>Where either</u></p>	<p>This proposed change is to the supporting text. It provides further clarity in relation to the protection of heritage assets with archaeological interest as set out in the NPPF. The previous SA assessment found the policy to have potential for significant</p>

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		<p><u>substantial harm or less than substantial harm is identified the council will expect the applicant to fully meet the requirements set out in the NPPF.</u></p>	<p>positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with the NPPF 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>
MM24	Policy DM32, page 95	<p><b><i>Policy DM32 The Royal Pavilion Estate</i></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 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. No additional SA assessment of this policy is considered necessary</p>
	Supporting text to Policy DM32, page 96	<p><b><i>Policy DM32 The Royal Pavilion Estate</i></b>  <i>Amend the second sentence of paragraph 2.245 of the supporting text to read:</i></p> <p><del>This should include improving the infrastructure within the gardens, such as</del> <u>Whilst the gardens were positively restored in the late 20<sup>th</sup> century, opportunity should be taken to enhance that</u></p>	<p>See commentary as above for DM32. No additional SA assessment of this policy is considered necessary.</p>

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		<p><u>previous scheme with, for example, protective fencing, better paths and lighting levels, improved irrigation and waste disposal and better facilities for the gardening staff.</u></p>	
	<p>Supporting text to Policy DM32, page 96</p>	<p><b>Policy DM32 The Royal Pavilion Estate</b>  <i>Amend paragraph 2.246 of the supporting text by adding a new third sentence and by amending the fourth sentence so that they read as follows:</i></p> <p><u>The garden's historic interest is in part its use as a promenading garden and place for reflection.</u>  <del>The impact</del> <u>Impacts</u> on public views and access will <u>also</u> form <u>a key</u> part of considerations.</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.  No additional SA assessment of this policy is considered necessary.</p>
<p>MM25</p>	<p>Policy DM33</p>	<p><b>Policy DM33 Safe, Sustainable and Active Travel</b>  <i>Amend criterion 2(d) of the policy to read:</i></p> <p>provide for sufficient levels of cycle parking facilities in line with the Parking Standards for New Development (Appendix 2) <del>(and any subsequent revisions)</del></p> <p><i>Amend criterion 2(e) of the policy to read:</i></p> <p>3) <u>where appropriate</u> make provision for high quality facilities that will encourage and enable cycling <del>including such as</del> communal cycle maintenance facilities, workplace showers, lockers and changing facilities;</p>	<p>A factual amendment. No SA implications.</p>
	<p>Policy DM33 Page 98</p>	<p><b>Policy DM33 Safe, Sustainable and Active Travel</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>	<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.</p>

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	Policy DM33	<p><b>Policy DM33 Safe, Sustainable and Active Travel</b> Amend footnote 64 to read:</p> <p>Non-standard cycles are those which do not easily fit into standard cycle racks, for example tricycles and cycles for those with disabilities.</p>	A factual amendment to clarify that ‘non-standard cycles’ include cycles designed for those with disabilities. No SA implications.
	Supporting text to Policy DM33, paragraph 2.253 page 100	<p><b>Policy DM33 Safe, Sustainable and Active Travel</b> Add sentence to end of paragraph 2.253: <u>In providing new infrastructure for cycling and walking, applicants should also have regard to ‘The Guide to Inclusive Cycling’ (Wheels for Wellbeing, 2020), 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> <p>Add sentence to end of paragraph 2.254: <u>In providing new infrastructure for public transport, applicants should have regard to the Brighton &amp; Hove Bus Service Improvement Plan.</u></p>	This proposed change provides further guidance but is not considered to have any SA implications.
MM26	Supporting text to Policy DM34 paragraph 2.257 page 103	<p><b>Policy DM34 Transport Interchanges</b> Amend paragraph 2.257 as follows:</p> <p>2.257 The policy seeks to facilitate the provision of purpose-built and strategic transport interchange facilities where they would help to reduce traffic congestion across the city and are suitably located and designed. This issue will be considered further as part of a future <u>Local Transport Plans Traffic Network Management Strategy and Interchange Strategy.</u></p>	A factual amendment. No SA implications.
	Policy DM34 footnote 65 Page 102	<p><b>Policy DM34 Transport Interchanges</b> Amend footnote 65 as follows: <sup>65</sup><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 110 and 111</u></p>	A factual amendment. No SA implications.

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MM27	Policy DM35, page 104	<p><b>Policy DM35 Travel Plans and Transport Assessments</b> Amend the part (1) to read:</p> <p>Transport Statements, Transport Assessments, Construction and Environmental Management Plans and Travel Plans are required to support planning applications for all developments that are likely to generate significant amounts of movement/travel in <del>line</del> <u>accordance</u> with the NPPF <del>or</del> <u>and having regard to any subsequent national or locally derived standards and guidance.</u></p>	A factual amendment. No SA implications.
	Policy DM35, page 104	<p><b>Policy DM35 Travel Plans and Transport Assessments</b> Amend the second sentence of part (3) to read:</p> <p>Where Transport Statements or Transport Assessments are required for developments elsewhere, as set out in criterion (1), <u>the likely traffic impacts within AQMA should be considered and agreed with the council in order to determine</u> <del>considered to inform decisions about</del> whether an AQA is required.</p>	A factual amendment. No SA implications.
	Policy DM35, page	<p><b>Policy DM35 Travel Plans and Transport Assessments</b> Amend the fourth sentence of paragraph 2.261 to read:</p> <p>Matters to be considered will include accordance with <del>SPD14</del> <u>the parking standards set out in Appendix 2</u>, likelihood and impact of potential overspill parking onto nearby streets, trip generation, and arrangements for servicing and deliveries. Whilst development should generally be located in the most accessible locations, some development proposals, for example in urban fringe locations, may give rise to the need for a package of transport measures to support sustainable travel.</p>	A factual amendment. No SA implications.
MM28	Policy DM36, criterion 2, page 107	<p><b>Policy DM36 Parking and Servicing</b> Amend policy introduction and criterion 2 to read:</p> <p>Provision of parking, including 'blue badge' holder and cycle parking, in new developments should follow the standards in <del>SPD14 'Parking Standards for New Development' (and any subsequent revisions)</del> <u>as set out in Appendix 2</u>. In addition:</p>	This proposed change is to ensure legal compliance. It has no implications on the SA or the findings of the previous SA assessments.

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		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>	
	Supporting text to Policy DM36, paragraph 2.266, page 108	<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.
	Policy DM36 Paragraph 2.268, page 108	<p><b>Policy DM36 Parking and Servicing</b>  <i>Amend the first sentence in 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.
MM29	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><del>Development should avoid adverse impacts and All development should</del> seek to conserve and enhance biodiversity and geodiversity features ensuring:</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.
	Policy DM37 page 110	<p><b>DM37 Green infrastructure and nature conservation</b>  <i>Nature Conservation section. Amend first two bullet points to read:</i></p> <ul style="list-style-type: none"> <li>• <u>accordance with the mitigation hierarchy requirements of the NPPF*(link to footnote);</u></li> <li>• <u>an additional measurable net gain in biodiversity is achieved;</u></li> </ul>	See commentary above for DM37.

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		<p><i>Footnote to read:</i></p> <p>The “mitigation hierarchy” is set out in <u>the NPPF paragraph 180</u>, 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>	
	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 priority</u> species and habitats are protected and supported;</li> </ul>	See commentary above for DM37.
	Policy DM37 page 110	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend bullet point list under Nature Conservation section to read:</i></p> <ul style="list-style-type: none"> <li>• <u>ancient woodland and irreplaceable habitats are protected</u></li> <li>• that appropriate and long-term management of new or existing habitats is secured <u>and opportunities to connect habitats are secured</u> to ensure a network of nature recovery<sup>67</sup>; and</li> </ul>	See commentary above for DM37.
	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 above for DM37.
	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>Proposals for development within a designated site of importance to nature conservation or which could impact upon a designated site must <u>also</u> satisfy the following criteria:</p>	See commentary above for DM37.

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	Policy DM37 page 111	<p><b>Policy DM37 Green Infrastructure and Nature Conservation Amend Part A. Internationally protected sites to read:</b></p> <p>All development must comply with the Conservation of Habitats and Species Regulations (as amended) (<a href="#">link to new footnote</a>). 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 compensatory provision is secured.</li> </ul> <p><i>New footnote to read:</i>  <a href="#">The Conservation of Habitats and Species Regulations 2017 (as amended)</a></p>	See commentary above for DM37.
	Policy DM37 page 111	<p><b>Policy DM37 Green Infrastructure and Nature Conservation Amend Part B. Nationally protected sites to read:</b></p> <p>Development proposals should avoid impacts on nationally protected sites (<a href="#">link to new footnote</a>). Development proposals likely to have an adverse effect on the site's notified special interest features will not be permitted, <u>unless the only exception is if:</u></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> <li>ii) the <del>less impacts</del> can be mitigated <u>in accordance with the mitigation hierarchy; through on or off-site habitat creation to achieve a net gain in biodiversity/ geodiversity.</u></li> </ul>	See commentary above for DM37.
	Policy DM37 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  Move the first paragraph of page 112 and place as a footnote linked to the first sentence of Part B. Nationally protected sites. In addition, add text to footnote to refer to MCZ assessment.</p>	See commentary above for DM37.

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<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. Development likely to have an effect on the Marine Conservation Zone will be required to assess the impact by means of a Marine Conservation Zone Assessment.</u></p>	
	Policy DM37 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</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 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):</del></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) <u>the loss impacts can be mitigated through on or off-site habitat creation; and to achieve a net gain in biodiversity/geodiversity.</u></p> <p>iii) <u>on site or off site as part of a local strategic ecological network additional measurable net gains in biodiversity/geodiversity can be achieved.</u></p>	See commentary above for DM37.
	Policy DM37 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <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>	See commentary above for DM37.
	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 bullet point list on page 111. Paragraph reads:</i></p>	See commentary above for DM37.

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		Proposals liable to affect green infrastructure and nature conservation features either directly or indirectly must be 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.	
	Policy DM37 p.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><u>Designated Sites</u>  Where proposals are liable to <del>cause direct or indirect harm</del> <u>impact to</u> a designated sites, 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, <del>and how loss can be mitigated to achieve measurable net gains.</del></li> </ul>	See commentary above for DM37.
	Supporting text to Policy DM37 paragraph 2.275 page 112	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <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>	See commentary above for DM37.
	Supporting text to Policy DM37 paragraph	<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>The opportunity for nature recovery networks should be considered <del>in accordance with</del> <u>regards to</u> the emerging <u>Nature Capital Investment Strategy</u> for Sussex and future Local Nature Recovery</p>	See commentary above for DM37.

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	2.278 page 114	Strategies, which will become a requirement under the Environment Act. Any invasive non-native species should be removed in accordance with legislation <u>and having regard to best practice guidance</u> (see also DM40 Protection of the Environment and Health – Pollution and Nuisance).	
	Supporting text to Policy DM37 paragraph 2.279 page 114	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</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 above for DM37.
	Supporting text to Policy DM37 paragraph 2.281 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</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 above for DM37.
	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>	See commentary above for DM37.
	Supporting text to Policy DM37 paragraph 2.282 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</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 above for DM37.

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	Supporting text to Policy DM37 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</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 above for DM37.
	Supporting text to Policy DM37 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</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 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>	See commentary above for DM37.
	Supporting text to Policy	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend paragraph 2.283 to read:</i></p>	See commentary above for DM37.

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	DM37 paragraph 2.283 page 115	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 <u>and 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>	
	Supporting text to Policy DM37 paragraph 2.284 page 115	<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. The Beachy Head West MCZ lies partly within the City Plan area.</u></p>	See commentary above for DM37.
MM30	Policy DM39 page 119	<p><b><i>Policy DM39 Development on the Seafront</i></b>  <i>Amend part a) of policy to read:</i></p> <p>a) <del>accord with</del> <u>have regard to</u> the relevant Shoreline Management Plan and Coastal Strategy Study#;</p> <p>include new footnote: #<u>Beachy Head to Selsey Bill Shoreline Management Plan 2006; Brighton Marina to Saltdean Strategy 2001 and Brighton Marina to River Adur Strategy 2014 or their updates.</u></p>	A factual amendment to clarify the status of these management plans. No SA implications.
	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</del> and 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. Development likely to</u></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

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		<p><u>have an effect on the Marine Conservation Zone will be required to assess the impact by means of a Marine Conservation Zone Assessment.</u></p>	<p>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.</p> <p>No additional SA assessment of this policy is considered necessary</p>
	<p>Supporting text to Policy DM39 paragraph 2.300 page 120</p>	<p><b><i>Policy DM39 Development on the Seafront</i></b>  <i>Amend Supporting text at end of sentence at paragraph 2.300 to read:</i></p> <p>The council will seek to ensure that any new or enhanced sea defences integrate sensitively with the local environment <u>and 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.</p> <p>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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
<p><b>MM31</b></p>	<p>Policy DM40 Page 122</p>	<p><b><i>DM40 Protection of the Environment and Health – Pollution and Nuisance</i></b>  <i>Amend criteria a)iii to read:</i></p> <p>iii. Appropriate measures can and will be incorporated to attenuate/mitigate existing and/or potential problems in accordance with national <u>policy and having regard to national and local guidance</u>; and</p>	<p>A factual amendment to clarify the status of national and local guidance. No SA implications.</p>

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	Policy DM40 page 122	<p><b>DM40 Protection of the environment and health-pollution and nuisance</b></p> <p><i>Amend and combine criteria (e) and (f) to read:</i></p> <p>(e) particular regard must be given to <u>assess</u> the impacts of emissions from transport, flues, fixed plant, and, heat and power systems. <del>(f) New biomass combustion and CHP plants associated with major developments will not be acceptable in or near an Air Quality Management Area and sensitive receptors such as the Royal Sussex County Hospital due to the need to comply with nitrogen dioxide limits; and</del></p>	An editorial amendment to improve the effectiveness of the policy. No SA implications.
	Policy DM40 Page 123	<p><b>DM40 Protection of the Environment and Health – Pollution and Nuisance</b></p> <p><i>Amend criteria (g) to read:</i></p> <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 and amenity</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>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 detrimental impacts light pollution can have, which now includes health and amenity.</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</p>

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			<p>not give rise to any forms of pollution that could be detriment 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.</p> <p>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.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	Supporting text to Policy DM40, para 2.305 page 123	<p><b>Policy DM40 Protection of the environment and health-pollution and nuisance</b>  <i>Amend supporting text paragraph 2.305 to read:</i></p> <p><del>Two</del> Six Air Quality Management Areas (AQMAs) are currently designated within the city; <del>one</del> covering the city centre, <u>Rottingdean, South West Portslade, Sackville Road-Old Shoreham Road, South Road-Preston Road, and Eastern Road (Hospital). and Portslade,</u> and a second smaller area that includes <del>Rottingdean High Street and its junction with the A259.</del></p>	A factual amendment to reflect new AQMA designations. No SA implications.
	Policy DM40 paragraph 2.311 page 125	<p><b>DM40 Protection of the environment and health-pollution and nuisance</b>  <i>Amend 4<sup>th</sup> sentence of paragraph 2.311 to read:</i></p> <p>Any noise impact study and noise assessment must be carried out in accordance with current authoritative guidance and British Standards <u>and having regard to the local noise action plan</u> <sup>89</sup> .</p>	A factual amendment. No SA implications.

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	Supporting text to Policy DM40 paragraph 2.314 page 125	<p><b>DM40 Protection of the Environment and Health – Pollution and Nuisance</b></p> <p><i>Amend supporting text paragraph 2.314 as follows:</i></p> <p>2.314 <u>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. Development proposals should avoid excessive and unnecessary lighting to limit the potential for impacts on 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). Lighting design should have regard to the Institute of Lighting Professionals (ILP) Guidance Note 1 for the Reduction of Obtrusive Light (2020). 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.</u></p>	See commentary as above for DM40. No additional SA assessment of this policy is considered necessary.
MM32	Policy DM41 page 126	<p><b>DM41 Polluted and hazardous substances and land stability</b></p> <p><i>Amend first sentence of policy to read:</i></p> <p><del>Development proposals must ensure that</del> <u>Planning permission will be granted for developments that can demonstrate they do not prejudice health, safety, natural capital and the quality of the city's environment.</u></p>	<p>The previous SA assessment found the policy to have potential for significant positive effects for objectives 11 relating to soil quality and objective 13 making best use of land available. The proposed change to the policy wording is considered to strengthen the policy in relation to this objective by making it clearer and unambiguous 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>

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MM33	Policy DM43 page 131	<p><b>Policy DM43 Sustainable Drainage</b>  <i>Amend first sentence of third paragraph of policy to read:</i></p> <p>SuDS should be sensitively located and designed <u>from the outset, in line with having regard to recognised best practice<sup>97</sup>, the Urban Design Framework SPD and in accordance with the Sustainable Drainage SPD</u> to ensure that the quality of local water is not adversely affected;</p>	An editorial and factual amendment. No SA implications.
	Supporting text 2.333 to Policy DM43 page 132	<p><b>Policy DM43 Sustainable Drainage</b>  <i>Amend paragraph 2.333 to read:</i></p> <p>2.333 The choice of appropriate sustainable drainage measures for a site/development should be informed by specific catchment and ground characteristics, and will require the early <u>design stage</u> consideration of a wide range of issues relating to the <u>design, location, management, long term adoption and maintenance of SuDS. A landscape-led approach to sustainable drainage techniques should be undertaken. Best practice and detailed guidance is set out in the South East Authorities Water People Places masterplanning guidance together with the Urban Design Framework SPD, the Sustainable Drainage SPD and the CIRIA (2015) guide for master planning sustainable drainage into developments.</u></p>	<p>The proposed changes are in the supporting text to clarify that consideration of SUDs should be undertaken early in the design stage and refer to relevant local guidance. The previous SA assessment found the policy to have potential for significant positive effects for objective 7 (water quality), objective 8 (flood risk) and objective 10 (climate change adaptation). The proposed change to the policy wording is considered to strengthen the policy in relation to these objectives 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>
MM34	Policy DM44 page 134	<p><b>Policy DM44 Energy Efficiencies and Renewables</b>  <i>Amend first sentence of policy to read:</i></p>	Although the proposed changes to the entire policy are unlikely to change the findings of the previous SA assessment,

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		<p>The council will encourage all development to improve energy efficiency and achieve greater reductions in CO2 emissions in order to contribute towards Brighton &amp; Hove's ambition to become a carbon neutral city by 2030. In addition to the requirements set out in Policy CP8 Sustainable Buildings<sup>#</sup>, the following standards of energy efficiency and energy performance will be required unless it can be demonstrated that doing so is not technically feasible and/or would make the scheme unviable:</p> <p><i>Add New Footnote: <sup>#</sup>Policy CP8 sets out the energy performance and water efficiency standards for residential new build and the BREEAM standards for non-residential and greenfield development.</i></p>	<p>particularly in relation to relevant objective 9 relating to reducing greenhouse gas emissions, full SA assessment of policy DM44 will be undertaken due to the changes to the policy and additional policy requirements.</p>
	<p>Policy DM44 Page 134</p>	<p><b><i>DM44 Energy Efficiency and Renewables</i></b> <i>Amend parts one and two of the Policy to create four parts and to read:</i></p> <ol style="list-style-type: none"> <li>1. <u>All development including conversions and change of use of existing buildings to new residential dwellings to achieve at least 19% improvement on the carbon emission targets set by Part L (2013) until the Future Homes Standard or any interim uplift in Part L which exceeds 19% improvement come into effect unless superseded by national policy or legislation;</u><sup>100</sup></li> <li>2. <u>Non-residential development (major and non-major<sup>#</sup>) including conversions and changes of use to achieve at least 19% improvement on the carbon emission targets set by Part L (2013) until the Future Buildings Standards or any interim uplift in Part L which exceeds 19% improvement come into effect.</u></li> </ol> <p><del>2. All development to achieve a minimum Energy Performance Certificate (EPC) rating of:</del></p> <ol style="list-style-type: none"> <li><del>3. A minimum Energy Performance Certificate EPC rating 'C' for conversions and changes of use of existing buildings to residential and non-residential use<sup>101</sup>.</del></li> <li>4. <u>A minimum Energy Performance Certificate EPC rating 'B' for new build residential and non-residential development.</u></li> </ol> <p><i>Insert new footnote:</i> <i><sup>#</sup>As defined in the supporting text to Policy CP8 at Table 6</i></p>	<p>See commentary as above for DM44.</p>

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	Policy DM44 Page 134	<p><b>DM44 Energy Efficiency and Renewables</b>  Amend part footnote 100 to read:</p> <p><del>100 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>	See commentary as above for DM44.
	Policy DM44 Pages 134 - 135	<p><b>DM44 Energy Efficiency and Renewables</b>  Amend first sentence of last paragraph of policy to read:</p> <p>All <u>major residential and non-residential development</u> 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</u> including the size/capacity of the systems and the estimated CO2 savings that will be achieved. <del>Through preparation of the technical guidance the LPA will review and clarify what developers provide in the Energy Statement to ensure their robustness. For example, ensuring the statement will clearly set out how each element of the design will help to achieve carbon reductions.</del></p>	See commentary as above for DM44.
	Policy DM44 paragraph 2.335 Page 135	<p><b>DM44 Energy Efficiency and Renewables</b>  Amend paragraphs 2.335 of supporting text to read:</p> <p>2.335 The purpose of this policy is to ensure that development delivers secure, affordable, low carbon growth, increases future energy resilience, and delivers the strategic objectives of City Plan Part One to become a zero- carbon city by 2050<sup>102</sup>. This policy sets out the further steps the council will take to reduce carbon emissions associated with <del>all new</del> development...</p>	See commentary as above for DM44.
	Supporting text to Policy DM44 para. 2.345	<p><b>DM44 Energy Efficiency and Renewables</b>  Amend paragraph 2.345 of supporting text to read:</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</p>	See commentary as above for DM44.

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	Page 137	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 achieve the carbon savings set out in <u>meet</u> City Plan Part One Policy CP8, <u>fabric energy efficiency measures and</u> alternative or additional technologies will need to be utilised to meet the 19% improvement against part L 2013.	
	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: 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.</i></p> <p><i>*Add new footnote: 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.</i></p>	See commentary as above for DM44.
	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><i>2.346 If a developer can demonstrate that there is a technical or financial reason why <del>this</del> <u>the 19% improvement against Part L 2013</u> target cannot be achieved they would be expected to deliver as close to this target as possible.</i></p>	See commentary as above for DM44.
	Supporting text to Policy DM44 paragraphs	<p><b>DM44 Energy Efficiency and Renewables</b>  <i>Delete paragraph 2.351, and amend 2.359 – 2.361 of supporting text to read:</i></p> <p><i>2.351 Developers are required to confirm the predicted EPC ratings for all buildings when submitting a planning application, to submit a copy of the final EPC to the planning authority on</i></p>	See commentary as above for DM44.

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	2.351 2.359 and 2.361 pages 138 - 140	<p><del>completion. It is assumed no additional work will be required from the developer as it is a legal requirement to produce a draft EPC before work starts on site and a final EPC at completion for submission.</del></p> <p>...</p> <p>2.359 <del>For major residential and non-residential development, the achievement of the CO2 emission reduction standard can be demonstrated through an Energy Statement prior to commencement of development.</del></p> <p><i>Split 2.359 to create new paragraph:</i></p> <p>At post construction stage, achievement of the standard can be demonstrated <u>as follows: for dwellings, through final ‘as built’ reports produced for Building Regulations compliance e.g. SAP (Standard Assessment Procedure) for dwellings or EPC; and for non-residential development, through SAP, EPC and /or SBEM (Simplified Building Energy Model) or BRUKL (Building Regulations UK Part L) for non-domestic development.</u> The council will <u>also expect ‘as built’ reports for larger non-domestic developments to demonstrate compliance to Policy CP8 BREEAM standards by producing a BREEAM final certificate, ie: most developments should meet BREEAM UK New Construction assessment; 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.</u></p> <p>2.360 <del>If required, detailed information relating to the specific information required, format and presentation of this information in Energy Statements will be set out in a technical guidance document to ensure consistency of reporting and evidence requirements.</del></p> <p>2.361 This <u>Energy Statement should provide details of the low and zero carbon energy technologies used including the size/capacity of the systems and the estimated CO2 savings that will be achieved. A technical guidance document will be produced to provide support on the specific information required to demonstrate compliance as well as guidance on passive design, good building fabric and avoiding over-heating.</u></p>	
MM35	Policy DM46, page 143	<p><b><i>DM46 Heating and cooling network infrastructure</i></b></p> <p><i>Amend the second paragraph of the policy to read:</i></p> <p>Where proposals come forward with combined heat and power (CHP) they must meet CHP Quality Assurance standards (CHPQA)<sup>120</sup> and demonstrate that heating and cooling systems have been selected in accordance with the heating and cooling hierarchy, <del>and CIBSE Heat Network Code of</del></p>	A factual amendment to clarify the status of code of practice. No SA implications.

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		Practice <del>121</del> and address the requirements in Policy DM40 <u>and have had regard to the CIBSE Heat Network Code of Practice</u> <sup>121</sup> ;	
MM36	Policy SA7, page 156	<p><b>SA7 Benfield Valley</b>  <i>Amend first sentence of policy to read:</i></p> <p>Land at Benfield Valley <u>as shown on the Policies Map</u> will be protected and enhanced as an important green wedge into the urban area, a valued Local Wildlife Site and Local Green Space.</p>	An editorial and factual amendment. No SA implications.
	Supporting text to Policy SA7, paragraph 3.9, page 158	<p><b>SA7 Benfield Valley</b>  <i>Amend paragraph 3.9, first bullet point to read:</i></p> <p>A Landscape and Visual <del>Character</del> <u>Impact</u> Assessment<sup>139</sup> which will inform landscape led masterplans for development sites and associated</p> <p><sup>139</sup> To be carried out in accordance with Guidelines for Landscape and Visual Impact Assessment 3<sup>rd</sup> Edition (Landscape Institute and IEAM 2013).</p>	An editorial and factual amendment. No SA implications.
MM37	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>

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			No additional SA assessment of this policy is considered necessary.
	Policy SSA1 Page 153	<p><b>SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road</b> Amend requirements a) and b) of the Policy to read:</p> <p>a) Achieve a high quality of design which preserves <del>and where possible enhances the setting of</del> the Grade II Listed Building and <u>the most significant non-designated heritage assets and where possible enhances the setting of the listed building.</u> A comprehensive Heritage Impact Assessment will be required;</p> <p>b) Create active frontages along Freshfield Road and Pankhurst Road through selective openings on the flint wall that do not undermine the heritage character <u>and appearance of the wall.</u></p>	<p>This proposed change to the policy requirements provides further clarity in respect of the heritage assets. The previous SA assessment found the policy to have potential for positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with other heritage policies and 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>
	Supporting text to Policy SSA1 Page 154	<p><b>SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road</b> Amend paragraph 3.12 of the supporting text to read:</p> <p>The main Brighton General Hospital Arundel Building and the later <del>built</del> infirmary blocks form a prominent group of landmark buildings on <del>the high ridge on</del> the east side of Brighton. The site occupies an elevated position with extensive viewpoints <u>from</u> across the city and requires a high quality architectural response. The Arundel Building is a Grade II listed building and was <u>originally formerly</u> used as the city's workhouse. There are a number of 19th Century Infirmary and Workhouse Blocks located within the <u>curtilage setting</u> of the principal listed building that <del>and are therefore also may be curtilage listed or non-designated heritage assets.</del> <u>The site is attractively bounded by continuous high flint walls with brick piers that hold a heritage character deriving from the strong sense of enclosure they create and the use of local vernacular construction and materials.</u> Development proposals with the potential to affect the listed building or its settings should be supported by <u>a appropriately scaled</u> Heritage Impact Assessments.</p>	See commentary as above for SSA1. No SA implications.

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	Supporting text to Policy SSA1, Paragraph 3.18 page 155	<p><b>SSA1 Brighton General Hospital Site, Elm Grove, Freshfield Road</b>  Delete last two sentences of paragraph 3.18 and create new paragraph to read:</p> <p><del>The site holds around 15 swift nests considered to be the oldest swift breeding colony in Brighton and Hove and thus offers a unique opportunity to safeguard and enhance biodiversity. Any new scheme will be required to make provision for installing and maintaining swift boxes in appropriate locations.</del></p> <p><u>New paragraph: The site is understood to hold around 15 to 20 swift nests that are considered to be the oldest and largest swift breeding colony in Brighton and Hove and thus the site offers a unique opportunity to safeguard and enhance biodiversity. Any new scheme will be required to make robust and appropriate provision to safeguard, protect and support the swift colony throughout the entirety of the development phasing: demolition, construction and operation. Any demolition should not occur before the end of a swift breeding season. A phased approach to both demolition and construction may be necessary as part of measures to provide an interim solution to safeguard the colony which could include the provision of additional swift bricks/boxes on remaining existing on-site buildings. Interim solutions will need to be proven to be successful.</u></p>	<p>This proposed change is in the supporting text. The new paragraph seeks to ensure that appropriate provision to safeguard, protect and support the swift colony throughout the entirety of the development phasing is delivered. The previous SA assessment already referred to the requirement of the policy to safeguard the swift colony, finding the policy to have potential for positive effects for objective 1 (biodiversity). The proposed addition adds further effectiveness 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>
MM38	Policy SSA2, page 156	<p><b>SSA2 Combined Engineering Depot, New England Road</b>  Amend policy at first paragraph second bullet point policy to read:</p> <ul style="list-style-type: none"> <li>the provision/replacement of a minimum of 1,000 sq m <del>B1</del> <u>E(g)</u> workspace and managed starter office units.</li> </ul>	<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.</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 the</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<p>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>
	<p>Policy SSA2 Page 156</p>	<p><b>SSA2 Combined Engineering Depot, New England Road</b> <i>Amend paragraph 3.23 of the supporting text to read:</i></p> <p>Brighton mainline station is a Grade II* listed building, the Railway Bridge is Grade II listed and the site is situated adjacent to West Hill Conservation Area. <u>The site itself may contain railway heritage buildings that meet the criteria for non-designated heritage assets (see DM28 ‘Locally Listed Heritage Assets’)</u>. Building heights and massing should respect strategic city wide views and enhance the setting of nearby heritage assets (see DM29 ‘The Setting of Heritage Assets’). <u>A Heritage Impact Assessment will be required with any application for the site.</u></p>	<p>This proposed change in the supporting text provides further clarity in respect of the heritage assets. The previous SA assessment found the policy to have potential for positive effects for objective 4 (heritage and townscape). The proposed changes add further effectiveness and consistency with other heritage policies and 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>
<p><b>MM39</b></p>	<p>Policy SSA3, page 158</p>	<p><b>SSA3 Land at Lyon Close, Hove</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>	<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)</p>

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		<ul style="list-style-type: none"> <li>expanded D1 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><i>(Fourth paragraph, criterion b.)</i></p> <p>All proposals, including changes in existing business uses (<del>Use Class B1-B8</del>) (<u>Use Classes E(g), B2 and B8</u>), 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>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 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>
	Supporting text to Policy SSA3, para 3.27, page 160.	<p><b>SSA3 Land at Lyon Close, Hove</b> <i>Amend last sentence of supporting text at paragraph 3.27 to read:</i></p> <p>However, proposals for tall buildings will need to be tested for visual impact from key viewpoints, <u>be in accordance with</u> as well as taking into account City Plan Part One policies and <u>have regard to</u></p>	An editorial and factual amendment. No SA implications.

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		<p><del>the supplementary guidance on tall buildings (to be reviewed in the forthcoming set out in SPD17 Urban Design Framework).</del></p>	
MM40	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 <u>E(g)</u>B1-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>
	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><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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<p>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>
Supporting text to Policy SSA4, paragraph 3.37 Page 162		<p><b>Policy SSA4 – Sackville Trading Estate and Coal Yard</b>  <i>Amend paragraph 3.37 to read:</i></p> <p>The Hove Station area is identified in the <del>Tall Buildings</del> <u>Urban Design Framework SPD</u><sup>138</sup> as having opportunities for tall building development.</p>	An editorial and factual amendment. No SA implications.
Supporting text to Policy SSA4 Page 162		<p><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 the AQMA at the junction of Sackville Road and Old Shoreham Road 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.”</del></p>	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.
Supporting text to Policy SSA4 paragraph 3.39 Page 163		<p><b>Policy SSA4 – Sackville Trading Estate and Coal Yard</b>  <i>Amend paragraph 3.39 with additional sentence at end of paragraph:</i></p> <p><u>The Hove Station Area Supplementary Planning Document (adopted 16 September 2021) provides guidance on improving linkages in and from the Hove Station Area which is adjacent to this site.</u></p>	An editorial and factual amendment. No SA implications.
Footnote 138		<p><b>Policy SSA4 – Sackville Trading Estate and Coal Yard</b>  <i>Amend footnote 138 to read:</i></p>	An editorial and factual amendment. No SA implications.

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	Page 162	<p><del>www.brighton-hove.gov.uk/sites/brightonhove.gov.uk/files/downloads/localplan2001/15_SPGBHAll_buildings.pdf</del></p> <p><a href="http://www.brighton-hove.gov.uk/planning-and-building-regulations/spd17-urban-design-framework-supplementary-planning-document-udf">www.brighton-hove.gov.uk/planning-and-building-regulations/spd17-urban-design-framework-supplementary-planning-document-udf</a></p>	
MM41	Policy SSA5, page 164	<p><b>SSA5 Madeira Terrace and Madeira Drive</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>D1F1</del> <u>(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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<p>assessment. The previous SA assessment found the policy to have potential for significant positive effects for objective 15 (access to services) and objective 19 (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>
	<p>Policy SSA5 Page 164</p>	<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 and meet the following site specific requirements:</u></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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			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. No additional SA assessment of this policy is considered necessary.
	Supporting text to Policy SSA5 paragraph 3.44 page 165	<p><b>SSA5 Madeira Terrace and Madeira Drive</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> 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>	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 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.
	Policy SSA5 paragraph 3.45 page 165	<p><b>SSA5 Madeira Terrace and Madeira Drive</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 as above for SSA5. No additional SA assessment of this policy is considered necessary.

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	Supporting text to Policy SSA5 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) boutique hotel</u>. However, residential use will not be permitted. Careful consideration needs to be given to the relationship and connection between <u>potential the businesses within the arches and 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: #The Madeira Terrace 30 Project was commissioned in 2020 to consider the initial phase of repair and regeneration of part of the Madeira Terrace.</i></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>
	Supporting text to Policy SSA 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 the closed staircases between Marine Parade and Madeira Drive and the feasibility of improving lift access to include whether Madeira Lift could be opened all year round and/or the provision of additional lift access, as well as improved wayfinding and reducing the severance caused by the Volks railway whilst improving its visual setting.</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 SA objective, however, is not considered to change the results. No</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
	New footnote for supporting text to Policy SSA5 paragraph 3.48 page 165	<p><b>SSA5 Madeira Terrace and Madeira Drive</b>  <i>Add new footnote at the end of the last sentence in paragraph 3.48:</i></p> <p>A masterplan including public realm strategy will be developed to support the implementation of this policy#.</p> <p># <u>The Eastern Seafront Masterplan SPD is due to be adopted in 2022</u></p>	<p>additional SA assessment of this policy is considered necessary.</p> <p>An editorial and factual amendment. No SA implications.</p>
MM42	Policy SSA6, page 167	<p><b>SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive</b>  <i>Amend the two bullet points under first paragraph of policy to read:</i></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 A1, A3, A4 and <del>A5-E</del> (a), E (b), <u>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> </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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<p>change these effects or the results of the previous SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	<p>Supporting text to Policy SSA6, para. 3.52 page 168</p>	<p><b>Policy SSA6</b>  <i>Amend the first sentence of the supporting text 3.52 as follows:</i></p> <p>Ancillary retail uses will be permitted that support the new attraction and create footfall to the site. Due to the heritage assets (<u>the East Cliff Conservation Area and Grade II* listed Madeira Terraces and Shelter Hall which have been added to Historic England’s list of heritage assets at risk</u>) a <u>Heritage Impact Assessment will be required with any application for the site.</u> <del>Development</del> at beach level should be primarily single storey and should not exceed the height of middle promenade to respect the historic setting and open nature of the area...</p>	<p>An editorial and factual amendment in relation to heritage assets. No SA implications.</p>
MM43	<p>Policy SSA7, page 169</p>	<p><b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b>  <i>Amend bullet point under first paragraph of policy to read:</i></p> <ul style="list-style-type: none"> <li>• <del>B1a</del> <u>E(g) (i)</u> (offices), <del>D1</del> <u>E (e)</u> (health) F1 (a), (<del>health</del>/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 floorspace contributing towards employment opportunities and economic growth.</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<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>
	Supporting text to SSA7, page 170	<p><b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</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 as above for SSA7. No additional SA assessment of this policy is considered necessary.
	Supporting text to Policy SSA7 paragraph 3.59 page 170	<p><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></p> <p>“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).</p>	For clarification purposes. No impact on SA.
MM44	Policy H1 page 172	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Amend second sentence of first paragraph of policy to read:</i></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.

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening									
	Supporting text to Policy H1, paragraph 3.64, page 172	<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Add new sentence to Paragraph 3.64 to read:</i></p> <p>3.64 Only sites which are expected to bring forward 10 or more residential units are allocated in this policy. <u>Approximately 90% of this housing will be on sites of less than one hectare which considerably exceeds the 10% target set in the NPPF Paragraph 69a.</u> It is expected that smaller sites and windfall provision will continue to make a significant contribution towards the city's planned housing requirements as accounted for in Policy CP1.</p>	An editorial and factual amendment. No SA implications.									
	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 the following sites:</i></p> <table border="1" data-bbox="389 676 1061 1219"> <thead> <tr> <th data-bbox="389 676 613 858">Site Name</th> <th data-bbox="613 676 837 858">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="837 676 1061 858">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="389 858 613 1040"><del>Land between Marine Drive and rear of 2-18 The Cliff, Brighton</del></td> <td data-bbox="613 858 837 1040"><del>10<sup>147</sup></del></td> <td data-bbox="837 858 1061 1040"></td> </tr> <tr> <td data-bbox="389 1040 613 1222">2-16 Coombe Road</td> <td data-bbox="613 1040 837 1222">33</td> <td data-bbox="837 1040 1061 1222">B1 starter business units/affordable workspace at ground floor.</td> </tr> </tbody> </table> <p><i>Delete associated footnote 147:</i>  Development will mitigate any adverse impacts on designated sites and provide biodiversity net gains in accordance with Policy CP10 and DM37</p>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses	<del>Land between Marine Drive and rear of 2-18 The Cliff, Brighton</del>	<del>10<sup>147</sup></del>		2-16 Coombe Road	33	B1 starter business units/affordable workspace at ground floor.	<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>Land between Marine Drive and rear of 2-18 The Cliff, Brighton</del>	<del>10<sup>147</sup></del>											
2-16 Coombe Road	33	B1 starter business units/affordable workspace at ground floor.										

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening									
	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 table to add the following rows to read:</b></p> <table border="1" data-bbox="394 352 1061 568"> <tr> <td data-bbox="394 352 613 568">Land at the corner of Fox Way and Foredown Road, Portslade#</td> <td data-bbox="624 352 837 568"><del>10</del> 14</td> <td data-bbox="848 352 1061 568"></td> </tr> </table>	Land at the corner of Fox Way and Foredown Road, Portslade#	<del>10</del> 14		<p>The proposed change to the indicative quantum of units proposed to be delivered will result in a significant change which needs to be reassessed through the SA process.</p> <p>Full reassessment of H1 required to assess this change.</p>						
Land at the corner of Fox Way and Foredown Road, Portslade#	<del>10</del> 14											
	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 table to add the following rows to read:</b></p> <table border="1" data-bbox="394 679 1061 1118"> <thead> <tr> <th data-bbox="394 679 613 863">Site Name</th> <th data-bbox="624 679 837 863">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="848 679 1061 863">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 871 613 1007"><u>Land at Preston Road / Campbell Road, Brighton</u></td> <td data-bbox="624 871 837 1007"><u>24</u></td> <td data-bbox="848 871 1061 1007"></td> </tr> <tr> <td data-bbox="394 1015 613 1118"><u>154 Old Shoreham Road, Hove</u></td> <td data-bbox="624 1015 837 1118"><u>30</u></td> <td data-bbox="848 1015 1061 1118"><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>										
	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="394 1302 1503 1404"> <thead> <tr> <th data-bbox="394 1302 763 1404">Site Name</th> <th data-bbox="775 1302 1133 1404">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="1144 1302 1503 1404">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 1302 763 1404"></td> <td data-bbox="775 1302 1133 1404"></td> <td data-bbox="1144 1302 1503 1404"></td> </tr> </tbody> </table>	Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses				<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>			
Site Name	Indicative number of Residential Units (Use Class C3)	Permitted additional Uses										

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed			SA Screening			
		87 Preston Road, Brighton, BN1 4QG	25		Full reassessment of H1 required to assess this change.			
		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					
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 Total row to read:</i></p> <table border="1" data-bbox="387 759 1503 799"> <tr> <td data-bbox="387 759 763 799"><b>TOTAL</b></td> <td data-bbox="775 759 1133 799"><b><del>1,051</del> 752</b></td> <td data-bbox="1144 759 1503 799"></td> </tr> </table>			<b>TOTAL</b>	<b><del>1,051</del> 752</b>		<p>The proposed change is to the indicative 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>
<b>TOTAL</b>	<b><del>1,051</del> 752</b>							

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening									
	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="394 352 1395 847"> <thead> <tr> <th data-bbox="394 352 786 560">Site Name</th> <th data-bbox="797 352 1003 560">Indicative number of Residential Units (Use Class C3)</th> <th data-bbox="1014 352 1395 560">Permitted additional Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 568 786 719">Land between Manchester Street/Charles Street, Brighton, BN2 1TF#</td> <td data-bbox="797 568 1003 719">12</td> <td data-bbox="1014 568 1395 719"><del>B1-E class employment</del> floorspace or <del>D2</del> entertainment and leisure uses.</td> </tr> <tr> <td data-bbox="394 727 786 847">Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#</td> <td data-bbox="797 727 1003 847">49</td> <td data-bbox="1014 727 1395 847"><u>E class uses</u></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 class employment</del> floorspace or <del>D2</del> entertainment and leisure uses.	Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	<u>E class uses</u>	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.
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 class employment</del> floorspace or <del>D2</del> entertainment and leisure uses.										
Saunders Glassworks, Sussex Place, Brighton, BN2 9QN#	49	<u>E class uses</u>										
	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="394 1007 1395 1401"> <thead> <tr> <th data-bbox="394 1007 786 1182">Site Name</th> <th data-bbox="797 1007 1003 1182">Indicative <u>number of</u> Residential Units (Use Class C3)</th> <th data-bbox="1014 1007 1395 1182">Minimum Requirements for Other Uses</th> </tr> </thead> <tbody> <tr> <td data-bbox="394 1190 786 1401">71 - 76 Church Street, Brighton</td> <td data-bbox="797 1190 1003 1401"><del>50</del> <u>10</u></td> <td data-bbox="1014 1190 1395 1401"><del>B1 E(g) Employment floorspace in the northern part of the site on the ground floor which could include small scale workshop type units.</del></td> </tr> </tbody> </table>	Site Name	Indicative <u>number of</u> Residential Units (Use Class C3)	Minimum Requirements for Other Uses	71 - 76 Church Street, Brighton	<del>50</del> <u>10</u>	<del>B1 E(g) Employment floorspace in the northern part of the site on the ground floor which could include small scale workshop type units.</del>	See other commentary for H1. Full reassessment of H1 required to assess changes.			
Site Name	Indicative <u>number of</u> Residential Units (Use Class C3)	Minimum Requirements for Other Uses										
71 - 76 Church Street, Brighton	<del>50</del> <u>10</u>	<del>B1 E(g) Employment floorspace in the northern part of the site on the ground floor which could include small scale workshop type units.</del>										

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed			SA Screening
		Post Office site, 62 North Road, Brighton#	110	3000sqm <del>B1</del> <u>E(g)</u> employment floorspace.	
		27-31 Church Street (corner with Portland Street)#Ω	10	630sqm E(g) employment floorspace <del>B1</del> Offices.	
		Former Dairy Crest Site, 35-39 The Droveaway, Hove, #	14	500sqm <del>B</del> <u>E</u> use class 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</del> <u>E(g)</u> and B2 at Basin Road North level, use classes <u>E</u> <del>A2</del> , <del>B1</del> and ancillary <del>A1</del> at Kingsway level, and use class C3 on upper storeys.	
		Prestwich House, North Street, Portslade (Site SP1 in JAAP Policy CA3)	15	Use class <del>B1</del> <u>E(g)</u> on lower storeys.	
		Regency House, North Street, Portslade (Site SP4 in JAAP Policy CA3)	45	Use class <del>B1</del> <u>E(g)</u> on lower storeys	

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed			SA Screening			
		Former Flexer Sacks, Wellington Road, Portslade (Site SP5 in JAAP Policy CA3)	45	Use class <del>B1 E(g)</del> on lower storeys and use class C3 on upper storeys. Associated leisure and assembly (use class <del>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 E(g)</del> , B2 and B3).				
		Station Road site, Portslade (Site SP7 in JAAP Policy CA3)	15	Use classes A1, A2, A3 and <del>B1 E</del> fronting Station Road.				
Policy H1, Table 7, page 176		<p><b>Policy H1 Housing Sites and Mixed Use Sites</b>  <i>Table 7 – Residential Site Allocations amend the Total row to read:</i></p> <table border="1" data-bbox="389 1046 1503 1086"> <tr> <td data-bbox="389 1046 763 1086"><b>TOTAL</b></td> <td data-bbox="763 1046 1133 1086"><b>519479</b></td> <td data-bbox="1133 1046 1503 1086"></td> </tr> </table>			<b>TOTAL</b>	<b>519479</b>		See other commentary for H1. Full reassessment of H1 required to assess changes.
<b>TOTAL</b>	<b>519479</b>							
<b>MM45</b>	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 heading in fifth column of table as shown:</i></p>			Although this change in wording is considered unlikely to result in significant impacts, full reassessment of H2 will be undertaken to assess any changes to the total amount of housing anticipated to be delivered.			

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed					SA Screening														
		<table border="1"> <thead> <tr> <th data-bbox="398 432 510 647">Site Name</th> <th data-bbox="521 432 667 647">UFA Reference</th> <th data-bbox="678 432 813 647">Total Site Area (Hectares)</th> <th data-bbox="824 432 992 647">Area of Development Potential (Hectares)</th> <th data-bbox="1003 432 1137 647">Potential Indicative Number of Dwelling Units<sup>1</sup></th> <th data-bbox="1149 432 1294 647">Indicative Percentage of Family Sized Housing (3+ bedroom)</th> <th data-bbox="1305 432 1518 647">Key Site Considerations</th> </tr> </thead> </table>					Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations								
Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations															
	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"> <thead> <tr> <th data-bbox="398 839 544 1054">Site Name</th> <th data-bbox="555 839 689 1054">UFA Reference</th> <th data-bbox="701 839 835 1054">Total Site Area (Hectares)</th> <th data-bbox="846 839 1014 1054">Area of Development Potential (Hectares)</th> <th data-bbox="1025 839 1160 1054">Potential Indicative Number of Dwelling Units<sup>1</sup></th> <th data-bbox="1171 839 1317 1054">Indicative Percentage of Family Sized Housing (3+ bedroom)</th> <th data-bbox="1328 839 1518 1054">Key Site Considerations</th> </tr> </thead> <tbody> <tr> <td data-bbox="398 1062 544 1396"><b>Land at and adjoining Horsdean Recreation Ground, Patcham</b></td> <td data-bbox="555 1062 689 1396">Site 16 (2014 UFA); Study Area L4 (2015 UFA);</td> <td data-bbox="701 1062 835 1396">6.32</td> <td data-bbox="846 1062 1014 1396">1.17</td> <td data-bbox="1025 1062 1160 1396">25</td> <td data-bbox="1171 1062 1317 1396">50%</td> <td data-bbox="1328 1062 1518 1396"> <ul style="list-style-type: none"> <li>•ecology</li> <li>•heritage</li> <li>•open space</li> <li>•landscape</li> <li>•Groundwater Source Protection Zone</li> <li>•archaeology</li> <li>•ground water flooding<sup>146</sup></li> </ul> </td> </tr> </tbody> </table>					Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations	<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%	<ul style="list-style-type: none"> <li>•ecology</li> <li>•heritage</li> <li>•open space</li> <li>•landscape</li> <li>•Groundwater Source Protection Zone</li> <li>•archaeology</li> <li>•ground water flooding<sup>146</sup></li> </ul>	<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 Indicative Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations															
<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%	<ul style="list-style-type: none"> <li>•ecology</li> <li>•heritage</li> <li>•open space</li> <li>•landscape</li> <li>•Groundwater Source Protection Zone</li> <li>•archaeology</li> <li>•ground water flooding<sup>146</sup></li> </ul>															

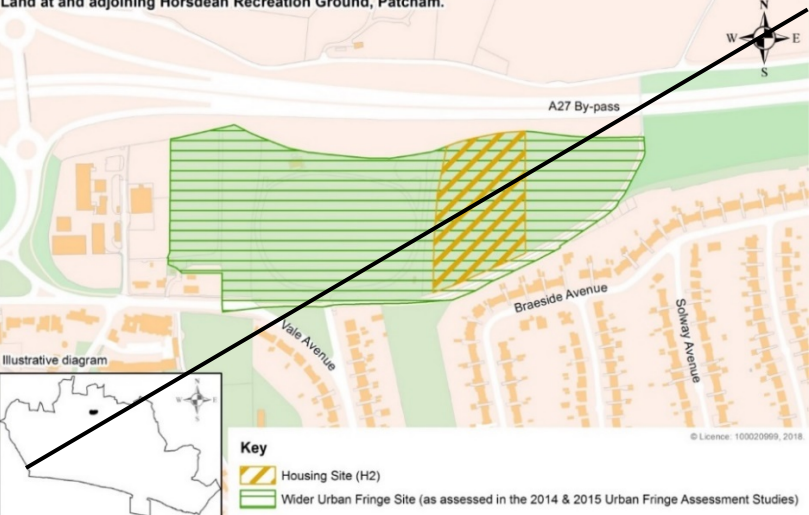
Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening														
	Policy H2 – Table 8 Urban Fringe Allocations, page 182	<p><b>Policy H2 Housing Sites – Urban Fringe</b>  <i>Table 8 Urban Fringe Allocations amend the following row to read:</i></p> <table border="1" data-bbox="389 429 1520 932"> <thead> <tr> <th data-bbox="389 429 533 644">Site Name</th> <th data-bbox="533 429 676 644">UFA Reference</th> <th data-bbox="676 429 819 644">Total Site Area (Hectares)</th> <th data-bbox="819 429 999 644">Area of Development Potential (Hectares)</th> <th data-bbox="999 429 1140 644">Potential Indicative Number of Dwelling Units<sup>1</sup></th> <th data-bbox="1140 429 1296 644">Indicative Percentage of Family Sized Housing (3+ bedroom)</th> <th data-bbox="1296 429 1520 644">Key Site Considerations</th> </tr> </thead> <tbody> <tr> <td data-bbox="389 644 533 932">Land at former nursery, Saltdean #</td> <td data-bbox="533 644 676 932">Site 46a (2014 UFA);  Study Area E14 (2015 UFA);</td> <td data-bbox="676 644 819 932">0.96 0.83</td> <td data-bbox="819 644 999 932">0.96 0.75</td> <td data-bbox="999 644 1140 932">24 18</td> <td data-bbox="1140 644 1296 932">50%</td> <td data-bbox="1296 644 1520 932"> <ul style="list-style-type: none"> <li>• surface and ground water flooding<sup>139</sup></li> <li>• landscape</li> <li>• Groundwater Source Protection Zone</li> <li>• wastewater infrastructure</li> </ul> </td> </tr> </tbody> </table>	Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations	Land at former nursery, Saltdean #	Site 46a (2014 UFA);  Study Area E14 (2015 UFA);	0.96 0.83	0.96 0.75	24 18	50%	<ul style="list-style-type: none"> <li>• surface and ground water flooding<sup>139</sup></li> <li>• landscape</li> <li>• Groundwater Source Protection Zone</li> <li>• wastewater infrastructure</li> </ul>	<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>
Site Name	UFA Reference	Total Site Area (Hectares)	Area of Development Potential (Hectares)	Potential Indicative Number of Dwelling Units <sup>1</sup>	Indicative Percentage of Family Sized Housing (3+ bedroom)	Key Site Considerations											
Land at former nursery, Saltdean #	Site 46a (2014 UFA);  Study Area E14 (2015 UFA);	0.96 0.83	0.96 0.75	24 18	50%	<ul style="list-style-type: none"> <li>• surface and ground water flooding<sup>139</sup></li> <li>• landscape</li> <li>• Groundwater Source Protection Zone</li> <li>• wastewater infrastructure</li> </ul>											
Supporting text to Policy H2 Paragraph 3.69 page 183		<p><b>Policy H2 Housing Sites – Urban Fringe</b>  <i>Amend final sentence of supporting text at paragraph 3.69 to read:</i></p> <p>In addition, <del>the provision of serviced plots for self build and custom build housing and proposals for community led housing will be strongly encouraged</del> <u>all development proposals will be expected to include a proportion of serviced plots for self and/ custom build dwellings subject to viability considerations</u> (see also Policy DM1 Housing Quality, Choice and Mix).</p>	See commentary as above for H2.														
Supporting text to Policy H2 Paragraph		<p><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></p> <p><del>Ecological Assessment including Protected Species Survey</del> <u>Ecological Impact Assessment</u></p>	See commentary as above for H2.														

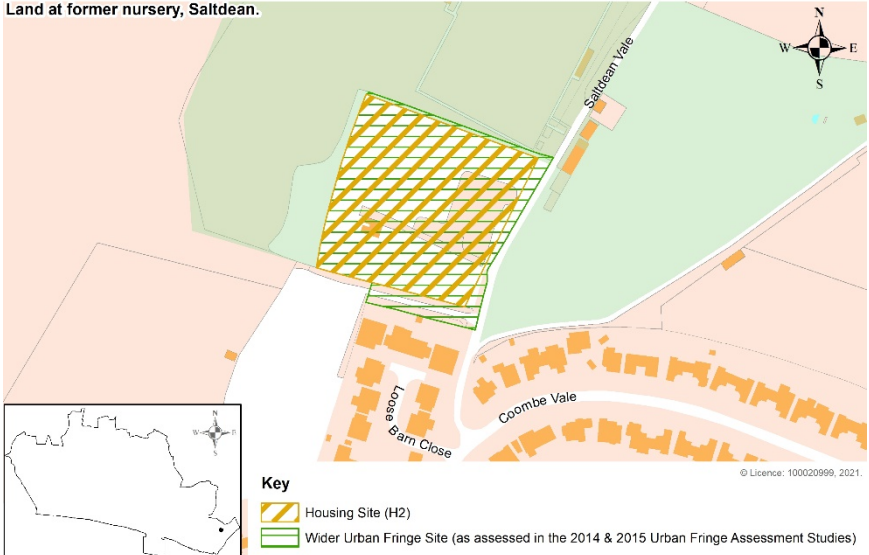
Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening					
	3.73 page 184							
	Supporting text to Policy H2 Paragraph 3.73 page 184	<p><b>Policy H2 Housing Sites – Urban Fringe</b>  Add new footnote after the words ‘Heritage Statement’ in the final sentence in the supporting text at paragraph 3.73:</p> <p><i>New footnote to read: <u>In accordance with Historic England Advice Note 12: Statements of Heritage Significance.</u></i></p>	See commentary as above for H2.					
	Supporting Text to Policy H2 Paragraph 3.76 page 185	<p><b>Policy H2 Housing Sites – Urban Fringe</b>  Amend second sentence of supporting text at paragraph 3.76 to read:</p> <p>All sites where potentially significant impacts on ecology were identified in the 2014 Urban Fringe Assessment have been subject to <del>detailed</del> ecological assessments in the 2015 Urban Fringe Assessment, which included a Desktop Study and Phase 1 Habitat Survey. 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.</p>	See commentary as above for H2.					
MM46	Policy H3 page 186	<p><b>Policy H3 Purpose Built Student Accommodation</b>  Amend Table 9 to read</p> <table border="1" data-bbox="389 965 1093 1114"> <thead> <tr> <th>Site Name</th> <th>Indicative-number of bedspaces</th> </tr> </thead> <tbody> <tr> <td><del>45 &amp; 47</del> <u>39-47</u> Hollingdean Road, Brighton</td> <td><del>40</del> <u>99</u></td> </tr> </tbody> </table>	Site Name	Indicative-number of bedspaces	<del>45 &amp; 47</del> <u>39-47</u> Hollingdean Road, Brighton	<del>40</del> <u>99</u>	The proposed change is to reflect an extant planning permission. Full reassessment of H3 required to assess this change.	
	Site Name	Indicative-number of bedspaces						
<del>45 &amp; 47</del> <u>39-47</u> Hollingdean Road, Brighton	<del>40</del> <u>99</u>							
Policy H3, Table 9 page 186	<p><b>Policy H3 Purpose Built Student Accommodation</b>  Amend policy at Table 9 Purpose Built Student Accommodation Sites - delete row:</p> <table border="1" data-bbox="389 1225 1408 1409"> <thead> <tr> <th>Site Name</th> <th>Indicative number of bedspaces</th> <th>Other Required Uses</th> </tr> </thead> <tbody> <tr> <td><del>118–132</del> London Road, Brighton</td> <td><del>232</del></td> <td><del>Ground floor uses must comply with Policy DM12</del></td> </tr> </tbody> </table>	Site Name	Indicative number of bedspaces	Other Required Uses	<del>118–132</del> London Road, Brighton	<del>232</del>	<del>Ground floor uses must comply with Policy DM12</del>	<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						
<del>118–132</del> London Road, Brighton	<del>232</del>	<del>Ground floor uses must comply with Policy DM12</del>						

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
	Supporting text to Policy H3, para. 3.81 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>
MM47	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</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
			<p>changes to the policy will not change the result of the actual SA assessment.</p> <p>No additional SA assessment of this policy is considered necessary.</p>
	<p>Supporting text to Policy E1, paragraph 3.87, page 188</p>	<p><b><i>E1 Opportunity site for business and warehouse uses</i></b>  <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, integrity of the local wildlife site 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>
	<p>Supporting text to Policy E1,</p>	<p><b><i>Policy E1 Opportunity Site for business and warehouse uses</i></b>  <i>Add new sentence to the end of paragraph 3.87 to read:</i></p>	<p>The policy was previously found to have potential for an adverse impact on the objective relating to the SDNP (objective 3)</p>

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
	paragraph 3.87 page 188	<p><u>The design and materials used in development will be expected to reflect the setting and natural beauty of the National Park and should reflect the South Downs Integrated Landscape Character Assessment (SDILCA), specifically the Landscape Management and Development Considerations described in Appendix A, Landscape Type A: Open Downland and A2: Adur to Ouse Open Downs area<sup>#</sup></u></p> <p><i>Add new footnote:</i> <u><sup>#</sup>South Downs Landscape Character Assessment (LCA) 2020</u></p>	<p>due to its relative proximity. The new supporting text reflects this proximity, it should have a more positive effect on the landscape and is likely to change the result of the previous SA assessment.</p> <p>Full SA reassessment required.</p>
MM48	Appendix 2, page 198	<p><b><i>Appendix 2 Parking Standards</i></b> <i>Add wording before table in Appendix 2:</i></p> <p><u>Where the parking standards set out below refer to a 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>	Not assessed by SA.
MM49	Appendix 4 - Policy H2 Urban Fringe Housing Site Maps, page 211	<p><b><i>Appendix 4 Policy H2 Urban Fringe Housing Site Maps</i></b> <i>Delete indicative map titled 'Land at and adjoining Horsdean Recreation Ground':</i></p>	Change to map. No impact on SA.

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<p>Land at and adjoining Horsdean Recreation Ground, Patcham.</p> 	
Appendix 4 - Policy H2 Urban Fringe Housing Site Maps, page 215	<p><b>Appendix 4 Policy H2 Urban Fringe Housing Site Maps</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>	<p>Change to map. No impact on SA.</p>	

Main Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA Screening
		<p>Land at former nursery, Saldean.</p> 	

## Appendix B Screening of Proposed Additional Modifications

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
AM01	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.
AM02	Introduction paragraph 1.9 page 8	<p>Add the following text to paragraph 1.9  <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 came into effect on the 5 October 2020.</b>  <u>CIL</u> allows local authorities to raise funds from development for the provision of infrastructure in and around their areas.</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.
AM03	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>A duty to Cooperate Update Paper is published alongside the Proposed Submission City Plan Part 2 <u>and will include an updated Statement of Common Ground prepared by the West Sussex and Greater Brighton Local Planning Authorities.</u></p>	Not within policy. Factual update. No SA implications.
AM04	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><b>Table 1 Timetable for the Preparation of City Plan Part Two</b></p>	Not within policy. Editorial update. No SA implications.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening														
		<table border="1"> <thead> <tr> <th data-bbox="479 209 1205 292">City Plan Part Two stage of plan preparation</th> <th data-bbox="1205 209 1637 292">Date</th> </tr> </thead> <tbody> <tr> <td data-bbox="479 292 1205 344">Scoping Document (Regulation 18)</td> <td data-bbox="1205 292 1637 344">June 2016</td> </tr> <tr> <td data-bbox="479 344 1205 397">Draft Plan and SA (Regulation 18)</td> <td data-bbox="1205 344 1637 397">Summer 2018</td> </tr> <tr> <td data-bbox="479 397 1205 496"><del>Publication of Proposed Submission City Plan Part 2</del></td> <td data-bbox="1205 397 1637 496"><del>Approved by Council 23 April 2020</del></td> </tr> <tr> <td data-bbox="479 496 1205 630">Regulation 19 Consultation</td> <td data-bbox="1205 496 1637 630">Dates to be confirmed after Coronavirus (Covid-19) restrictions are lifted.</td> </tr> <tr> <td data-bbox="479 630 1205 683">Submission to the Secretary of State</td> <td data-bbox="1205 630 1637 890" 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="479 683 1205 735">Examination in Public</td> </tr> <tr> <td data-bbox="479 735 1205 890">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	<del>Publication of Proposed Submission City Plan Part 2</del>	<del>Approved by Council 23 April 2020</del>	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	
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AM05	Introduction paragraph 1.14 - 1.18, page 11	<p><b><i>How to Comment on the Proposed Submission City Plan Part Two</i></b>  Delete paragraphs 1.14-1.18 and associated footnote as follows:</p> <p><del>How to Comment on the Proposed Submission City Plan Part Two</del></p> <p><del>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.</del></p> <p><del>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</del></p>	Not within policy. Editorial update. No SA implications.														

Mod. Number	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><del>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.</del></p> <p><del>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></del></p> <p><del>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</del></p>	
AM06	footnote 11 Page 15	<p><b><i>Policy DM1 Housing Quality, Choice and Mix</i></b> Amend footnote 11 to read: National Planning Policy Framework (NPPF) (2019) (2021) paragraph 61-62</p>	Editorial update. No SA implications.
AM07	Policy DM4 page 22	<p><b><i>DM4 Housing and Accommodation for Older Persons</i></b> Add the following numbering to the second paragraph of policy to read:</p> <p>'<u>1</u>. Development proposals....'</p>	Editorial update. No SA implications.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
AM08	Policy DM4 page 22	<b><i>DM4 Housing and Accommodation for Older Persons</i></b> <i>Add the following numbering to the fourth paragraph of policy to read:</i>  <i>'2. Proposals that....'</i>	Editorial update. No SA implications.
AM09	Policy DM5 page 27	<b><i>DM5 Supported Accommodation (Specialist and Vulnerable Needs)</i></b> <i>Add the following numbering to the second paragraph of policy to read:</i>  <i>'1. Proposals for development ....'</i>	Editorial update. No SA implications.
AM10	Policy DM5 page 27	<b><i>DM5 Supported Accommodation (Specialist and Vulnerable Needs)</i></b> <i>Add the following numbering to the third paragraph of policy to read:</i>  <i>'2. Proposals that....'</i>	Editorial update. No SA implications.
AM11	Policy DM6 Page 30, footnote 30	<b><i>DM6 Build to Rent Housing</i></b> Amend footnote 30 to read:  MHCLG National Planning Policy Framework, February <del>2019</del> <u>2021</u>	Factual update. No SA implications.
AM12	Supporting text to Policy DM8, paragraph 2.72 page 37	<b><i>DM8 Purpose Built Student Accommodation</i></b> <i>Amend the first sentence of the supporting text at paragraph 2.72 to read:</i>  "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."  <i>Delete associated footnote 36:</i>  <del>36 3,146 bedspaces managed by University of Brighton, 8,167 managed by University of Sussex, and 1,386 privately managed.</del>	Factual/editorial update. No SA implications.
AM13	Supporting text to Policy DM8, para graph 2.73	<b><i>DM8 Purpose Built Student Accommodation</i></b> <i>Amend the first sentence of the supporting text paragraph 2.73 to read:</i>	Factual update. No SA implications.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<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>	
AM14	Footnote 43 Page 56	<p><b><i>DM14 Commercial and Leisure Uses at Brighton Marina</i></b> Amend footnote to read:</p> <p>National Planning Policy Framework (NPPF) <del>(2019)</del> (2021) paragraphs <del>89-90-90-91</del></p>	Factual update. No SA implications.
AM15	Supporting text to Policy DM16 Paras 2.137 and 2.138	<p><b><i>DM16 Street Markets</i></b> <i>Amend supporting text at the first sentence of paragraph 2.137 and the first sentence of paragraph 2.138 to read:</i></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.
AM16	Policy DM22, Footnote 60 Page 82	<p><b><i>DM25 Communications Infrastructure</i></b> Amend footnote 60 to read: National Planning Policy Framework (NPPF), <del>(2021)</del> paragraph 116 <del>-118</del>.</p>	Factual update. No SA implications.
AM17	Policy DM33, para 2.250 page 100	<p><b><i>Policy DM33 Safe, Sustainable and Active Travel</i></b> <i>Amend paragraph 2.250 to read:</i></p> <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>	Factual update; no SA implications.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
AM18	Policy DM37 page 111	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Add new section heading at start of section on protected sites to read:</i></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.
AM19	Supporting text to Policy DM37 paragraph 2.275 page 113	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend the third sentence in paragraph 2.275 to read:</i></p> <p>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 particular <u>principal</u> importance (formerly known <u>as</u> BAP habitats)...</p>	Editorial amendment. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
AM20	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> <sup>74</sup> <del>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.
AM21	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.
AM22	Policy DM37 Footnote 75 page 113	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Delete repeated text from footnote 75 as follows:</i></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</del></p>	Typographical correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		and focuses on safeguarding endangered chalk grassland, vital for rare and endangered wildlife and the provision of clean drinking water and green space	
AM23	Supporting text to Policy DM37 paragraph 2.280 page 114	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend first sentence of paragraph 2.280 to read:</i></p> <p>Proposals must assess potential impacts on, nature conservation features (which includes geodiversity) (see paragraph 2.282).</p>	Improves clarity. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
AM24	Policy DM37 footnote 76 page 114	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend footnote to read:</i></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.
AM25	Supporting text to Policy DM37 paragraph 2.282 page 115	<p><b>Policy DM37 Green Infrastructure and Nature Conservation</b>  <i>Amend second sentence to supporting text at paragraph 2.282 to read:</i></p> <p>Ecological reports should be produced in line with the British Standard on biodiversity <u>management in planning and development</u> BS42020:2013 and CIEEM Technical Guidance (and subsequent revisions).</p>	Factual correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.
AM26	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.
AM27	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>	Factual correction. No SA implications however Policy DM37 reassessed as whole due to significant changes to the policy text and structure.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		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).	
AM28	Policy DM38, Footnote 81 Page 117	<b>Policy DM38 Local Green Spaces</b> Amend footnote 81 to read: National Planning Policy Framework (NPPF) <del>{2018}</del> paragraphs <del>101 103</del> and <del>143 147 147-151</del> .	Factual update. No SA implications.
AM29	Supporting text to DM40, Paragraph 2.308 Page 124	<b>Policy DM40 Protection of the Environment and Health – Pollution and Nuisance</b> This policy complements the AQAP by ensuring that all new developments adhere to the NPPF guidance that developments should contribute towards national objectives for pollutants (paragraph <del>184 186</del> of the NPPF <u>2021</u> )	Factual update. No SA implications.
AM30	Policy DM40 Footnote 91 Page 125	<b>DM40 Protection of the Environment and Health – Pollution and Nuisance</b> Amend footnote 91 to read: National Planning Policy Framework ( <u>NPPF (2021)</u> ), Paragraph <del>182-186</del> .	Factual update. No SA implications.
AM31	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.
AM32	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 <u>draft Neighbourhood Plan as the Hove Station Quarter</u> ). <u>Once adopted the Neighbourhood Plan, will form part of the Development Plan for the city.</u>	Factual update. No SA implications
AM33	Footnote to SSA7, page 170	<b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b> Amend footnote text and weblink to:	For clarification purposes. No impact on SA. Factual update. No SA implications.

Mod. Number	Submission City Plan Part 2 Reference	Modification Proposed	SA screening
		<sup>154</sup> <a href="https://www.southdowns.gov.uk/planning/planning-advice/landscape/">https://www.southdowns.gov.uk/planning/planning-advice/landscape/</a> South Downs Landscape Character Assessment (LCA) 2020	
AM34	Footnote 152, page 184	<p><b>Policy H2 Housing Sites – Urban Fringe</b>  <i>Amend Footnote 152 to read:</i></p> <p><sup>152</sup> Brighton &amp; Hove City Council Planning Advice Note 06 Food Growing and Development <del>September 2011</del>  <u>Updated September 2020</u></p>	Factual update. No SA implications.
AM35	Footnote 154 page 185	<p><b>Policy H2 Housing Sites – Urban Fringe</b></p> <p>Amend footnote text and weblink to:</p> <p><sup>154</sup> <a href="https://www.southdowns.gov.uk/planning/planning-advice/landscape/">https://www.southdowns.gov.uk/planning/planning-advice/landscape/</a> South Downs Landscape Character Assessment (LCA) 2020</p>	Factual update. No SA implications.
AM36	Appendix 6 pages 221- 223	<p><b>Appendix 6 Proposed Changes to Policies Map – Tables 1 and 2</b>  <i>Delete Appendix 6</i></p>	Editorial change. No SA implications.

## Appendix C Policy Re-Appraisals

### DM10 Public Houses

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	+?	+?	+?	Pubs could be located within a listed building, or within a Conservation Area. Vacant premises can result in heritage assets being at risk of neglect or decay and can erode the character of a Conservation Area. The main aim of the policy is to protect pubs and their associated floorspace, and not allow loss, which could include change of use or redevelopment, unless certain circumstances are met. If the pub was a vacant listed building, this could result in heritage assets being at greater risk of decay or neglect. However, the policy is considered to have flexibility as sets out clear criteria where loss would be allowed. If the site was a vacant listed building, then the policy could have a positive impact on this objective by enabling heritage assets to be brought back into active use. This is also uncertain as depends upon the site and whether it has heritage value.	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	+	+	+	Retention of pubs that are near the community it serves can help to reduce the need to travel. In addition, the policy will only allow loss of a pub where alternative provision is available locally, which also should help to reduce the need to travel. Impacts should be positive.	D	P
13. To make the best use of land available	+	+	+	The main aim of the policy is to protect pubs and not allow loss unless certain circumstances are met. If the pub was a vacant premise, this could result adverse impacts for this objective as would not be making the best use of sites available. However, the policy is considered to have flexibility as sets out clear criteria where loss would be allowed, including floorspace ancillary to the operation of the pub such as outside amenity space or visitor accommodation. If the site being redeveloped was a vacant premise, then the policy could have a positive impact on this objective by enabling an underused/vacant/derelict site to be brought back into active uses.	D	P
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	Although the policy will not increase provision, the policy is considered to have a positive impact on this objective as will lead to the protection of pubs and their associated floorspace, enabling communities to meet their needs to access these facilities locally. In addition, where change of use is permitted, priority is for alternative community uses, which will also enable people to access other community-type services, and only allows loss where alternative provision is available locally, which helps to maintain access. The protection of pubs, or their	D	P

				alternative community use can help bring footfall to an area and help to ensure the ongoing vitality of the retail centres they are located within where relevant. Overall, the policy should have significant positive impacts on this objective.		
16. To improve health and well-being, and reduce inequalities in health	++	++	++	The policy will lead to the protection of pubs and their associated floorspace or will permit change of use to alternative community uses and will only permit loss where it has been demonstrated that a local community no longer needs it. Pubs and community use provide opportunities for social interaction which supports general well-being, and their protection will ensure ongoing access to these types of facilities. The availability of pubs and community uses also helps in the formation of balanced communities. Overall impacts should be significantly positive.	I	P
17. To improve community safety, and reduce crime and fear of crime	+	+	+	The policy will lead to the protection of pubs and their associated floorspace or will permit change of use to alternative community uses. Pubs and community use provide opportunities for social interaction which can have a positive effect on community safety. In addition, the ability to change the use, e.g., in the case of a derelict site where the site is brought back into active use can also help to reduce the fear of crime.	I	P
18. To increase equality and social inclusion	+?	+?	+?	The policy will lead to the protection of pubs and their associated floorspace or will permit change of use to alternative community uses and only where it has been demonstrated that a local community no longer needs the provision. Pubs and community uses can provide opportunities to meet the needs of people with protected characteristics however this is dependent on what service is provided and is therefore also uncertain.	I	T
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	+	+	+	The policy will lead to the protection of pubs and their associated floorspace. Pubs provide employment opportunities and can provide a focal point in local centres, helping to maintain their vitality and footfall, therefore supporting this objective. The flexibility to allow loss should also help with regeneration opportunities, e.g., with vacant/redundant premises and although the policy will prioritise community uses, this does not preclude other non-community uses. Cross reference in supporting text to DM40 and agent of change principle which help ensure existing premises are protected against future noise complaints from any new development located nearby. Overall impacts should be positive.	D	P

### 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 number 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>		
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#### 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 are 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
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### 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>The third part of this policy is considered to set out a strong protection for designated sites, including international, national, and locally designated sites. Although this part of the policy sets the framework against which proposals on sites of nature conservation importance will be considered, 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/MCZ). 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 up-to-date information about the biodiversity/geodiversity which may be affected is provided. Although it is recognised that Part C allows development that may have an adverse effect on local sites which are allocated for development within the development plan or where exceptional circumstances exists, the subsequent criteria still require appropriate mitigation and biodiversity net gains on these sites, either on or off site to be</p>	D	P

				part of a local strategic ecological network; this should result in positive effects overall. In addition, overarching criteria set out within the Nature Conservation section of the policy will also apply. Overall, the policy should have significant positive impacts on this objective.		
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-/+	-/+	-/+	The section of this policy concerned with green infrastructure should result in direct positive results for this objective; it should result in the safeguarding of various elements of the existing green infrastructure network, including open spaces and should result in GI being integrated into schemes. In addition, the policy should lead to enhancements in green infrastructure including the NIA, ancient woodland and trees. However, although the policy is considered to provide a strong protection for designated sites, 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. 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.	I/D	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	+	+	+	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. This policy only applies to those sites that are within the City Plan planning boundary. 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.	I	P
6. To improve air and noise quality	+	+	+	Sites of a natural form, as well as trees and other forms of green infrastructure play an important role in regulating the environment, including absorbing air pollutants and helping reduce noise nuisance. The policy recognises the importance of green infrastructure in relation to providing	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 development on designated sites. 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

#### DM44 Energy Efficiency and Renewables

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-?	-?	-?	<p>Certain types of low/zero energy infrastructure may have adverse impacts on ecology, depending on the type installed, scale and location. E.g. wind turbines could affect bats and birds and this would need to be assessed as part of any application.</p> <p>Solar PV is not considered to have any impacts on this objective.</p> <p>Impacts are also uncertain as would depend on type, scale and location of installation.</p> <p><b>Mitigation:</b> CPP1 Policy CP8 expects development to enhance biodiversity; CP10 requires development to conserve and protect biodiversity. This should ensure a neutral effect is achieved.</p>	I	P
3. To protect, conserve and enhance the South Downs National Park and	-?	-?	-?	The policy supports greater reductions in CO2 emissions, e.g. through fabric efficiency and LZC technologies, in certain areas of the city. This includes on	I	P

its setting, and improve sustainable access to it				urban fringe housing allocations. These sites are all situated within close proximity to the SDNP. Some LZC technologies, e.g. wind turbines, could have an adverse visual impact on landscape. Mitigation: CPP1 policy SA5 should ensure that development does not have an adverse impact on the setting of the SDNP.		
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	-?	-?	-?	The policy supports greater reductions in CO2 emissions, e.g. through fabric efficiency and LZC technologies, in certain areas of the city. This includes within Development Areas, some of which include heritage designations. Some LZC technologies, including solar PV and wind turbines could have an adverse impact on heritage assets and townscape. Mitigation: CPP1 policy CP15 Heritage and emerging CPP2 policies that provide policy on protecting heritage assets and their settings, and policy on design should provide mitigation and ensure either a neutral or positive impact is achieved.	I	P
6. To improve air and noise quality	-	-	-	Some forms of renewables technologies, such as wind turbines, can produce noise which can impact upon occupier amenity. This would be dependent on their location. Provision of this type of technology in industrial estates, as suggested by the policy, would be compatible with surrounding uses. Mitigation: Emerging policy on Protection of Environment and Health should address any potential noise impacts.	I	P
9. To reduce emissions of greenhouse gases that cause climate change	++	++	++	48% of residential development in 2016/17 was through conversions and changes of use which did not have to meet any additional carbon reductions over building regulations. The policy requires conversions and changes of use of existing buildings, including non-residential development, to achieve at least 19% improvement in CO2 reductions required by building regulations. This will help to ensure that these developments, not just new build, will be more energy efficient and ultimately produce less carbon emissions. This is not required for minor residential extensions. However, it should be noted that an interim Future Homes Standards and Future Building Standards come into effect in June 2022 which will be applicable to all development. The	D	P

				<p>policy also requires development to achieve certain standards of energy performance, which again should help to reduce carbon emissions.</p> <p>The policy also supports greater reductions in CO2 emissions in certain areas of the city, e.g. through passive design and fabric efficiency, as well as through renewable technologies, such as Development Areas, urban fringe allocations and industrial areas, as well as encouraged in other areas in support of the carbon neutral ambition. Policy now clearly states aim of becoming a carbon neutral city by 2030 and sets out position in terms of encouraging all development to improve efficiency.</p> <p>Policy should have significant positive impacts on achieving this objective through reducing carbon emissions.</p>		
16. To improve health and well-being, and reduce inequalities in health	++	++	++	<p>Fuel poverty is higher in Brighton &amp; Hove than the regional and national average. Having an energy efficient home has direct health benefits for all future occupiers, and particularly for those who have lower incomes and who may suffer from fuel poverty.</p> <p>The policy would ensure that all types and scales of development achieve a certain standard of energy efficiency/CO2 emissions, rather than just new build homes or other developments over a certain size.</p> <p>This would ensure that all new homes, including those that are delivered through conversions and changes of use, help to address the risks of fuel poverty, reduce health inequalities and support health.</p>	I	P
18. To increase equality and social inclusion	+	+	+	<p>Fuel poverty is higher in Brighton &amp; Hove than the regional and national average. Having an energy efficient home has direct benefits for occupiers, and particularly for those who have lower incomes and who may suffer from fuel poverty. It is recognised that people on lower incomes are not a “group of protected characteristics”, although some people with protected characteristics may have low incomes.</p> <p>The policy would ensure that all types and scales of development achieve a certain standard of energy efficiency/CO2 emissions, rather than just new build homes or other developments over a certain size.</p> <p>This would ensure that all new homes, including those that are delivered through conversions and changes of use, help to address the risks of fuel poverty and reduce health inequalities for future occupants.</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 33) 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 (4 out of 33) 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. I</p> <p>On balance, the policy is more likely to have no impacts or have positive impacts on this objective, particularly in the longer term, as provides the opportunity to improve and increase biodiversity.</p> <p><b>Mitigation:</b> Any potential for adverse impacts on biodiversity would be addressed by other policies within CPP1 and CPP2 including CP10, DM22 and DM37, with all development requiring to provide net gains for biodiversity.</p>	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	0	0	+	<p>The majority (27 out of 33) of the housing and mixed use sites are previously developed sites that do not contain any type of open space designations. The majority of the sites are therefore considered to have no impact on this objective, as will not result in loss of open space and are unlikely to result in an increase in on-site open space due to the size of the sites.</p> <p>Of the 6 sites containing open space; 3 contain publicly accessible open space and 3 contain private areas of designated open space.</p> <p>Some of the approved planning consents include delivery of small areas of open space or include a contribution towards improving a local open space which should result in positive impacts in the longer term.</p> <p><b>Mitigation:</b> Any sites that result in loss of on-site open space or that do not meet their open space requirements on site will be required to make a financial contribution towards improving open space off-site, with the impact therefore becoming more positive in the longer term.</p>	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	0	0	0	<p>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. 1 out of 33 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.</p>	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	<p>11 out of the 33 sites do not contain nor are in proximity to any heritage or archaeological designations and are unlikely to have any adverse impact. 22 of the sites contain a heritage asset, are in the setting of a heritage asset, and/or contain archaeological potential. Of these, 11 do not have a current planning consent or application under consideration and are therefore found to have potential for adverse impact on these assets.</p> <p>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.</p> <p>Overall, impacts are considered to be mixed.</p> <p>Any adverse impacts on heritage or archaeology would be addressed through CPP1 CP15 Heritage and draft CPP2 policies.</p>	I	P
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	++	++	++	<p>The majority of the sites (30 out of 33) are considered to have close access to a bus service providing a frequent service every 10 minutes; some sites also have good access to rail services, both of which may influence sustainable travel choice. The majority of sites are also considered to be within desirable or acceptable walking distance from essential services.</p> <p>Some of the sites promote mixed uses, which can help reduce the need to travel.</p> <p>3 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 1,231 dwellings will result in an increase journey made, some of which are likely to be by car, however this has been considered more broadly under the SA of CPP1.</p>	I	P
6. To improve air and noise quality	-/+	-/+	-/+	<p>9 of the 33 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; 6 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 16 sites have no air quality issues (although 6 of these do have noise issues).</p>	I	T

				<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.</p> <p>Mitigation would be provided by CPP1 CP9 Sustainable Transport policy, draft CPP2 policy on Transport and Travel and Protection of the Environment &amp; Health.</p>		
7. To improve water quality (ecological, chemical and quantity status)	+	+	+	<p>28 of the 33 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 wastewater 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>32 of 33 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 32 sites within floodzone 1, 7 have no risk of any form of flooding.</p> <p>Of the 32 sites within floodzone 1, 7 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 32 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>	I	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 31 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>		
9. To reduce emissions of greenhouse gases that cause climate change	-/+	-/+	-/+	<p>19 of the 33 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 33) consist of previously developed land, comprising existing buildings or cleared ground which does not contain any open space designations. 4 of the 33 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 33 sites may have potential for contamination based on current/former uses or have been investigated as part of a planning</p>	I	P

				<p>application. These sites are therefore considered to have potential for positive impact on this objective as development of the sites for housing would require remediation and improvement in soil quality. The remaining sites which do not have potential for contamination are unlikely to have any impact on this objective. None of the sites contain grade 3 or higher agricultural land, therefore will not result in loss of land with agricultural value.</p> <p>Overall impacts are mixed positive and neutral towards improving soil quality. In addition, new supporting text requirements relating to remediation of contaminated land should impact positively where relevant.</p>		
12. To minimise and sustainably manage waste	-	-	-	<p>5 of the 33 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. 4 of the sites are vacant/cleared sites therefore do not 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>	I	P
13. To make the best use of land available	+	+	+	<p>11 of the 33 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 33 sites to deliver an indicative 1,231 dwellings across the city. The SA notes that although this amount has reduced from Proposed Submission stage, this predominantly 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 sites</p>	D	P

				<p>being delivered by the council including through the New Homes for Neighbourhood scheme, which delivers 100% affordable rented homes, as well as schemes that provide housing for vulnerable people.</p> <p>It is noted that the policy only permits C3 type housing on the allocated sites, however this does include housing where people are living together as a single household and receive care, e.g. older people or people with disabilities, and also includes some housing types for older people, such as sheltered housing. It also includes self-build.</p> <p>The policy is considered to have a significant positive impact on this objective.</p>		
15. To improve the range, quality and accessibility of services and facilities.	++	++	++	<p>All of the housing and mixed-use sites are considered to be within desirable or acceptable walking distance to at least two of the following essential services such as public transport, local shop, health facility, primary school and children's play-space/park. 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>	I	P
16. To improve health and well-being, and reduce inequalities in health	+	+	+	<p>Housing is one of the wider determinants of health and the policy should help to bring forward a significant amount of housing, including affordable housing. The policy could also help to bring forward opportunities for employment, which is also one of the wider determinants of health.</p> <p>As described under objective 15, all of sites have good access to various services which also has a positive impact on health and could facilitate sustainable and active travel.</p> <p>25 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 33 sites are located within the 10-20% most deprived SOA within the crime domain, meaning that crime is high in these locations. This has</p>	I	P

				<p>implications for design stage where measures to design out crime would be particularly essential.</p> <p>The majority of the sites (25 out of 33 sites) are located within areas where crime deprivation is not within the 10 or 20% most deprived SOA, crime domain.</p> <p>Some of the sites provide opportunities for increasing activity through mixed use developments, supporting community safety and reducing the fear of crime through the renovation or development of vacant and derelict sites, and provide opportunities for community interaction which can help increase passive surveillance and also support community safety.</p> <p>Overall impacts are considered to be positive.</p> <p>Mitigation would be provided by CPP1 CP12 which requires all development to incorporate features which deter crime.</p>		
18. To increase equality and social inclusion	+	+	+	<p>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 28 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 5 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.</p> <p>Some of the sites are located in areas with a high level of employment and/or education deprivation, and most are located in fairly close proximity to areas of high employment and/or education deprivation and may therefore provide the 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

<p>19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.</p>	<p>-/+/0</p>	<p>-/+/0</p>	<p>-/+/0</p>	<p>12 of the sites could have a positive impact on this objective as the allocation should result in increase in commercial floorspace or an improvement in the quality and type of commercial floorspace, due to the indicative requirements to provide other uses.</p> <p>9 of the 33 sites have potential for adverse impact on this objective as the site allocated is currently in active commercial use or if vacant, was previously in commercial use, and the housing or mixed use development could result in net loss employment floorspace on these sites.</p> <p>12 of the 33 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>	<p>D</p>	<p>P</p>
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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
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,	0	0	0	++	++	++/-	++	-	+	+	0	+	+	++	+	+	++	++	0	Pos
Old Ship Hotel, (garage), Brighton	0	0	0	-	++	++/-	++	++	+	0	0	--	++	++	++	+	--	++	0	Mixed
Saunders Glassworks, Sussex Place	0	0	0	++	++	-/+	++	-	++	+	+	--	++	++	++	+	+	++	+	Pos
Outpatients Department RSCH	++	0	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>0</b>	<b>0</b>	<b>-/+/0</b>	++	<b>-/+</b>	++	<b>-/+</b>	<b>-/+</b>	+	<b>0/+</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. 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 have 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

<p>3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it</p>	-/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 SNDP and be in accordance with the Landscape Character Assessment.</p> <p>Overall impacts are considered to be mixed adverse/neutral in the short and medium term, reflecting that development on some sites is likely to result in adverse impacts initially whilst mitigation measures are not established (e.g. buffers/screening). In the longer term, impacts are considered to become more 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
<p>4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites</p>	-/0	-/0	-/0	<p>2 of the site allocations are within or contain a designated heritage asset; 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.</p>	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 indicative number of 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 wastewater 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 area 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 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 an indicative 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 housebuilding 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	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	Mixed	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	I	P

				on this objective due to the location. Emerging policy on PBSA also requires development to include measures to promote sustainable transport use, including management arrangements to prevent students from keeping cars, which will also impact positively on this objective.		
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 affected (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 affect 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 locations 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 site 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 349 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
39-47 Hollingdean Road, Brighton	++	0	0	0	++	--/+	--	-	+	+	+	--	+	++	++	++	-	++	0	Mixed
Overall	++	0	0	0	++	--/+	--	-	+	+	+	--	+	++	++	++	-/+	++	0	Mixed

### E1 Opportunity sites for business and warehouse uses

SA Objective	Short-term	Med-term	Long-term	Summary of Effects	Dir/Ind (D/I)	Temp/Perm (T/P)
1. To protect, conserve and achieve a net gain in biodiversity	-/+	-/+	+	The site is partially greenfield in nature consisting of green open space, could have some biodiversity interest and therefore impacts could be adverse. The policy text does not contain any additional requirements relating to biodiversity; however the supporting text includes a reference to the proximate LWS and the need to conserve and enhance biodiversity which should result in positive impacts. Impacts therefore considered to be mixed. CPP1 CP10 and DM37 should provide mitigation and ensure any development results in net gains in biodiversity.	I	P
2. To protect and improve open space and green infrastructure and improve sustainable access to it	-	-	-	The site consists of areas of non-designated open space and small area of designated open space of the natural/semi-natural typology. Development of the site could result in loss of designated open space. Impacts could be adverse. CP16 allows for loss of open space when a site is allocated within a DPD although requires some on-site retention.	I	P
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it	-/+	-/+	+	The policy does not contain any additional requirements relating to landscape sensitivities. Site is located adjacent to the SDNP and is therefore within the setting and could result in adverse impacts. However, supporting text includes a reference to the need for design and materials used in development to reflect the natural beauty of the SDNP and reflect the SDNP Landscape Management & Development Considerations assessment. Impact therefore considered to be mixed. Mitigation provided by CPP1 SA5 which requires development to be consistent with the purposes of the National Park and avoid significant harm. CP12 Urban Design requires development to have regard to impacts on the SDNP.	I	P
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites	0	0	0	There are no additional policy requirements relating to heritage assets or townscape. The site does not contain any heritage assets and is not adjacent or in close proximity to any. Therefore, there are no direct impacts on this objective by the policy itself.		

5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice	-	-	-	<p>The policy does not indicate the amount of floorspace that it would like delivered on the site and it is therefore difficult to predict the transport impacts that a development would have in this location. However as there is no development on the site currently, any new development would increase transport movements in the vicinity of the site.</p> <p>Although the site has reasonable access to a bus service, there is no bus service that directly serves the site, and the site is located in very close proximity to the SRN which could influence travel choice. Development could therefore have adverse impacts on this objective.</p> <p>Mitigation: CPP1 CP9 Sustainable Transport should help to mitigate any transport impacts and emerging policy on transport should help to facilitate sustainable travel.</p>	I	P
6. To improve air and noise quality	-/+?	-/+?	-/+?	<p>The policy does not indicate the amount of floorspace that it would like to be delivered on the site, and it is therefore difficult to predict the transport impacts, including impacts on air quality, that employment development would have in this location. However, it is acknowledged that the site is outside the AQMA and therefore would need to produce an average of 500 additional daily vehicle movements to have an adverse effect on air quality. The site is adjacent to the A27 and suffers from high levels of road noise. However, some business uses can often generate significant noise, and therefore this location, which is located away from major residential areas and already suffers from high levels of noise, could be suitable for these purposes. Overall, impacts are mixed and uncertain.</p>	I	T/P
7. To improve water quality (ecological, chemical and quantity status)	0	0	0	<p>The site is not within a GSPZ.</p> <p>There are no additional specific policy requirements relating to water quality or resources within the policy.</p> <p>CPP1 CP8 sets the standards relating to water quality and consumption for both new build residential and non-residential development which would be applied, and conversions would need to demonstrate how water resources are conserved.</p> <p>Overall, the policy is considered unlikely to have any additional impacts on this objective.</p>		

8. To reduce the risk from all sources of flooding to and from development	-	-	-	<p>The site comprises open spaces which will have a natural role in absorbing water.</p> <p>The site is in floodzone 1 and has no risk of surface water flooding. The site has groundwater at levels between 0.5m and 5m which poses some risk of groundwater emergence, however, is not within the two highest risk categories of groundwater flooding. It is noted that the SFRA considered the overall flood risk to be low and did not require it to be considered further by the sequential/exception tests.</p> <p>There are no additional specific policy requirements relating to flood risk. CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this.</p>		
9. To reduce emissions of greenhouse gases that cause climate change	0	0	0	<p>There are no additional specific policy requirements relating to energy consumption within the policy. The site is not within a heat network cluster opportunity area.</p> <p>CPP1 CP8 sets the standards relating to energy consumption for non-residential development which would be applied.</p> <p>Overall, the policy is considered unlikely to have any additional impacts on this objective.</p>		
10. To increase the city's resilience and ability to adapt to climate change	-	-	-	<p>The site currently comprises areas of open space which perform natural functions in terms of temperature regulation and absorption of water. Development of the site therefore may reduce the city's ability to adapt to climate change through change in form from a natural to urbanised form.</p> <p>Mitigation: CPP1 C8 requires all development to reduce surface water run-off and the emerging CPP2 policy on SUDS includes more specific details on implementing this. CPP1 CP10 requires net gains in biodiversity to be delivered, which could include green infrastructure.</p>	I	P
11. To improve soil quality	0	0	0	<p>The site is not known to be contaminated.</p> <p>There are no additional specific policy requirements relating to remediation of contaminated land within the policy and overall, the policy itself is considered unlikely to have any additional impacts on this objective.</p> <p>Emerging CPP2 policy on Polluted Sites should ensure that any necessary remediation takes place if required.</p>		

12. To minimise and sustainably manage waste	+	+	+	As the site has no existing buildings on site, development will not be able to re-use any existing buildings or resources on site. The policy refers to the fact that the site is allocated for waste uses within the Waste & Minerals Local Plan and that development will only be permitted provided that the waste allocation is not prejudiced. This is considered to have positive effects for this objective.	D	P
13. To make the best use of land available	+	+	+	The site has been allocated for waste uses for some time however currently remains undeveloped. Delivery of employment uses on the site could help to make good use of an undeveloped site having positive impacts for this objective.	I	P
14. To provide housing, including affordable housing, to contribute towards meeting local needs	0	0	0	The site is allocated for employment uses. There will be no impacts on this objective.		
15. To improve the range, quality and accessibility of services and facilities.	0	0	0	The site is allocated for employment uses and will not deliver any other types of uses or facilities. There will be no impacts on this objective.		
16. To improve health and well-being, and reduce inequalities in health	+	+	+	Access to meaningful employment is one of the wider determinants of health. It is recognised that the site may be used for informal recreation currently, and that this may be lost, however as the site is adjacent to the SDNP, which can also be used for recreational purposes and activity, development of this site is not considered to reduce the ability to access open space or take part in physical activity. The policy should therefore have positive impacts on this objective.	I	P
17. To improve community safety, and reduce crime and fear of crime	0	0	0	Development of the site would introduce active uses in a location where there are currently none, which can help support community safety. However, it is recognised that the site is within a SOA which does not suffer from high levels of crime deprivation and therefore it is unlikely that development in this location will have any effect on crime levels, or crime-based deprivation or community safety. Impacts are negligible.		
18. To increase equality and social inclusion	+?	+?	+?	Provision of employment opportunities can help reduce employment and skills-based deprivation, which is relatively high around the site. The policy does not require development to enter in training place agreements, as it is not strategic in nature. However, despite this, employment uses on site could help facilitate access to employment and could help reduce employment	I	P

				deprivation. Impacts could be positive depending on take up by deprived communities.		
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.	++	++	++	Policy could lead to an unspecified amount of new employment floorspace of B1 or B8 types. This would increase employment land supply and would contribute towards meeting the development needs of various employment sectors. It could also help support people access meaningful employment. Impacts should be positive.	D	P

## Appendix D The Selection and Rejection of Alternatives

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

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

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

This Appendix includes an individual table for each policy and provides information on the most recent two stages of plan preparation only: the Proposed Submission stage and Proposed Modifications stage. For all other stages of plan preparation, the SA of the Proposed Submission CPP2 should be referred to.

### Key to stages of preparation

Proposed Submission City Plan Part Two April 2020	PROPSUB20
Proposed Modifications City Plan Part Two February 2022	PROPMOD22

<b>DM1 Housing Quality Choice and Mix</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: Table 2 in policy replaced with government’s updated published version; clarification to supporting text - custom build/ self-build and reference to ecological and green infrastructure networks	PROPSUB20	Policy should have significant positive impacts for housing and health, positive impacts for equalities, economic development and biodiversity. Recognised that the policy could have adverse impacts for objective concerned with making the best use of land as could result in larger units.
Modification to part (e) to reflect building regulations and PPG relating to wheelchair accessible and adaptable housing.	PROPMOD22	Modification proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM3 Residential conversions and the retention of smaller dwellings</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - amendments include: Change which reduces the minimum floorspace needed, from 124sqm to 120sqm, to allow conversion into 2 or more units.	PROPSUB20	Policy should have significant positive impacts for housing and making the best use of land and positive impacts for health, equalities, and heritage.
Factual amendments to footnotes to clarify size of 2-bedroom unit and date at which the original floor area is calculated.	PROPMOD22	Modification proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM4 Housing and Accommodation for Older People</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – policy amended to reflect the identified need; requirement to provide internal and external communal space as appropriate; deletion of text requiring outdoor landscaped space; deletion of text allowing reduced housing standards where agreed; requirement for development to have regard to good design principles.	PROPSUB20	Policy should have significant positive impacts for housing, health and equalities and positive impacts for open space, transport, air quality, access and community safety.
Modifications made to improve clarity and effectiveness and to show support for inter-generational communities.	PROPMOD22	Modification proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM5 Supported Accommodation (Specialist and Vulnerable Needs)</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - – amendments include:  Policy still resists loss however sets out criteria whereby loss will be permitted, including surplus or the improvement of sub-standard accommodation.	PROPSUB20	Policy should have significant positive impacts for housing, health and equalities and positive impacts for open space, transport, air quality, access and community safety.

Modifications made to improve clarity and effectiveness of policy.	PROPMOD22	Modification proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
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<b>DM8 Purpose Built Student Accommodation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: additional criterion clarification of communal space requirements; replacing requirement for ‘on-site’ security presence with effective and ‘appropriate’ provision; removal of requirement for tenancy agreements to last full academic year.	PROPSUB20	Policy should have potential for significant positive impacts for transport, air/noise quality, and housing, positive impacts for best use of land, access, health, safety, and economic development. Policy could have adverse impacts on some site based objectives due to the preferred locations for PBSA.
Modifications made to clarify meaning of policy requirement for cluster units and to reflect the council’s position reacting to restriction of parking permits.	PROPMOD22	Modification proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM9 Community Facilities</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>

Preferred Approach – – amendments include: removal of ‘improved’ from policy as improvements would not be required to address policy; further clarification regarding when partial loss would be allowed.	PROPSUB20	Policy should have significant positive impacts for transport, access and health and positive impacts for heritage, air quality, best use of land, community safety, equalities and economic development.
Modifications reflect changes to the use class order and to clarify that certain change of use is permitted development.	PROPMOD22	Modification proposed to reflect changes to the Use class order and through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM10 Public Houses</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - no significant change to policy text from DRAFT18 stage; minor amendments to supporting text regarding viability and agent of change principle.	PROPSUB20	Policy should have significantly positive impacts for access and health, positive impacts for heritage, transport, best use of land, community safety, equalities and economic development.
Modification include new policy criteria relating to losses of floorspace and ancillary facilities.	PROPMOD22	Modification proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM11 New Employment Floorspace</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>

Preferred Approach – amendments include: clarification that part of policy also applies to B2 and B8 premises; simplification of policy wording around redevelopment for clarity, reference to zero-exhaust emissions infrastructure.	PROPSUB20	Policy should have significantly positive impacts for making the best use of land and economic development, positive impacts for health, equalities and waste, and mixed impacts for SDNP, transport and air/noise quality.
Modifications reflect changes to the use class order.	PROPMOD22	Modification proposed to reflect changes to the Use class order. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM12 Changes of Use within Regional, Town, District and Local Shopping Centres</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – – amendments include: widening the range of possible changes of use; removal of the criteria seeking to avoid 3 or more non A1 uses other than in Lanes and North Laines; marketing requirement reduced to 6 months; allowing temporary/meanwhile uses.  Clarification that residential uses would be permitted in some circumstances.	PROPSUB20	Policy should have significant positive impacts for access and economic development, and positive impacts for heritage, transport, air quality, making the best use of land, housing, health, community safety and equalities.
Modifications predominantly made to reflect changes to the use class order.	PROPMOD22	Modification proposed to reflect changes to the Use class order and through examination process. No alternative option considered.

		Policy impacts the same as Proposed Submission stage with the exception of impacts on access to services, which was found to be positive but not significantly positive, and impacts on economic development, which was found to be mixed.
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<b>DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - amendments include: clarification that C3 would be allowed in certain circumstances; allowing temporary/meanwhile uses; removal of the word "retail" in relation to A1 units in supporting text; additional of additional local parade: omitted in error.	PROPSUB20	Policy should have significant positive impacts for access and economic development, positive impacts for heritage, transport, air quality, housing, health, making the best use of land, community safety and equalities.
Modifications predominantly made to reflect changes to the use class order.	PROPMOD22	Modification proposed to reflect changes to the Use class order and through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage with the exception of impacts on access to services, which was found to be positive but not significantly positive.

<b>DM14 Commercial and Leisure Uses at Brighton Marina</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: changed name of policy; more flexibility for changes of use to range of commercial and	PROPSUB20	Policy should have significant positive impacts for access and economic development, positive impacts for transport, making the best use of land, housing, health and community safety.

leisure uses to reflect existing range and mix of shopping, commercial and leisure offer; allows change of use to residential on upper floors.		
Modifications predominantly made to reflect changes to the use class order and to ensure policy is in alignment with other related policies.	PROPMOD22	Modification proposed to reflect changes to the Use class order and through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM15 Commercial and Leisure Uses on The Seafront</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – change to policy name only.	PROPSUB20	Policy should have significant positive impacts for economic development, positive impacts for open space, heritage, flood risk, access to services, making the best use of land, health and community safety. There could be adverse impacts on biodiversity, transport and air/noise quality.
Modifications predominantly made to reflect changes to the use class order and to future proof policy.	PROPMOD22	Modification proposed to reflect changes to the Use class order and through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM18 High quality design and places</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>

<p>Preferred Approach - Reference to considering the circular economy principles added to policy.</p> <p>Simplification and reduction of supporting text to reflect further guidance will be provided in UDF, including references to strategic views and tall buildings being within the UDF.</p> <p>Additional supporting text to clarify that choice of materials should be low-maintenance, and that funded maintenance plans may be required.</p>	<p>PROPSUB20</p>	<p>Policy should have significant positive impacts for the heritage and townscape, positive impacts for open space, SDNP, transport, reducing greenhouse gas emissions, reducing waste, health and community safety.</p>
<p>Modifications improve policy clarity, provide for incorporation of artistic element for proposals impacting public realm, and reflect publication of national and local guidance.</p>	<p>PROPMOD22</p>	<p>Modification proposed through examination process. No alternative option considered.</p> <p>Policy impacts the same as Proposed Submission stage.</p>

<p><b>DM20 Protection of Amenity</b></p>		
<p><b>Option/Alternatives Considered</b></p>	<p><b>Stage of preparation</b></p>	<p><b>Reasons for rejecting/selecting</b></p>
<p>Preferred Approach - amendments include: policy clarifies that development should not cause 'unacceptable' loss; supporting text clarifies consultation should reflect SCI.</p>	<p>PROPSUB20</p>	<p>Policy should have significant positive impacts for health, positive impacts for community safety and adverse impacts for making the best use of land.</p>
<p>Modifications reflect adoption of local guidance</p>	<p>PROPMOD22</p>	<p>Modifications proposed through examination process. No alternative option considered.</p>

		Policy impacts the same as Proposed Submission stage.
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<b>DM22 Landscape Design and Trees</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: changes to clarify need to retain, improve and where possible provide landscaping, trees or planting; inclusion of reference to natural capital; reference to planting of wildlife/ pollinator friendly non-native species; requirement for net gains in biodiversity and enhancements to green infrastructure.	PROPSUB20	Policy should have significant positive impacts for biodiversity, flood risk, climate change adaptation and health, and positive impacts for open space, SDNP, heritage, air quality, water quality and making the best use of land.
Modifications improve clarity regarding tree removal and replacement, demonstrate links to climate change resilience, provide clarity regarding multi-functional uses, demonstrate links between landscaping and food growing, provide clarity regarding the definition of nationally important development.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM25 Communications Infrastructure</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>

Preferred Approach – amendments include: remove duplication of policy requirements for satellite antenna; policy wording on digital connectivity amended to ensure policy is implementable; consequential amendments to supporting text, including consulting with those who have a visual interest in the development.	PROPSUB20	Policy should have significant positive impacts for heritage/townscape and positive impacts for biodiversity, SDNP, access and economic development.
Modifications include clarifying description of heritage assets, and reduce ambiguity of wording relating to removal of redundant equipment.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM26 Conservation Areas</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - no changes to policy text, Reference in supporting text supporting contemporary and innovative design approaches and regarding conservation of traditional features on rear elevations.	PROPSUB20	Policy should have significant positive impacts for heritage, positive impacts for biodiversity , opens space, SDNP, making the best use of land and economic development.
Modification includes additional policy requirements regarding harm to heritage assets and reference to requiring Heritage Impact Assessment within supporting text.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM27 Listed Buildings</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – no changes to policy text	PROPSUB20	Policy should have significant positive impacts for heritage and positive impacts for waste, making the best use of land, housing and economic development.
Modification includes additional policy requirements regarding harm to heritage assets and reference to requiring Heritage Impact Assessment within supporting text.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM28 Locally Listed Heritage Assets</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - – amendments include: clarification that the potential for retention and reuse is to be explored in order for an informed and balanced judgement to be made.	PROPSUB20	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, flood risk, climate change adaptation, best use of land, and health.
Modification includes reference to requiring Heritage Impact Assessment within supporting text.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM29 The Setting of Heritage Assets</b>
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Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Preferred Approach – no change to policy text.	PROPSUB20	Policy should have significant positive impacts for heritage, and positive impacts for SDNP and economic development. The policy could also have positive impacts for other site-based objectives including biodiversity, open space, flood risk and climate change adaptation although will depend on the setting.
Modification includes additional policy requirements regarding harm to heritage assets , clarification that height is a consideration for scale, and reference to requiring Heritage Impact Assessment within supporting text.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM30 Registered Parks and Gardens</b>		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
Preferred Approach - amendments include: expectation that alternative, non-registered sites have been considered and assessed. Consequential changes to supporting text.	PROPSUB20	Policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, flood risk, climate change adaptation and health. Policy could also have positive impacts for best use of land and economic development through support for temporary uses.
Modification includes changes to improve clarity, additional policy requirements regarding harm to heritage assets, requirement to provide evidence of unsuitability of alternative sites for temporary events and reference to requiring Heritage Impact Assessment within supporting text.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

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<b>DM31 Archaeological Interest</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach –no changes	PROPSUB20	Policy should have significant positive impacts on heritage, and positive impacts for open space, SDNP, best use of land, and economic development.
Modification includes changes to supporting text regarding harm to heritage assets.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM32 The Royal Pavilion Estate</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - amendments include: clarification that proposals should be informed by adopted Conservation Plan; amendment to criteria to ensure a clutter free environment and net gains in biodiversity; new criterion that regard should be had to the impact of temporary events on planting and biodiversity.	PROPSUB20	The policy should have significant positive impacts for heritage and positive impacts for biodiversity, open space, transport, access, health, community safety, equalities and economic development.
Modifications improve clarity of policy, include reference to previous restoration scheme, and to reflect the garden’s historic significance.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.

		Policy impacts the same as Proposed Submission stage.
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<b>DM33 Safe, Sustainable and Active Travel</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - amendments include: clarification on certain policy provision 1b); 2b) and 3b) apply 'where appropriate'; clarification that cycle parking provision should be universally accessible; additional wording regarding extending existing cycle networks.	PROPSUB20	The policy should have significant positive impacts for transport, air quality, health, equalities and community safety, positive impacts for greenhouse gas emissions, access and economic development, and uncertain impacts for open space and the SDNP.
Modifications include updates to ensure legal compliance with regards to parking standards, amend 2(e) to clarify provision is required where appropriate only, reference to cycles for those with disabilities, and references to newly published guidance.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM34 Transport Interchanges</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: minor wording changes to aid clarity of policy and inclusion of footnote referencing relevant government guidance and supporting text	PROPSUB20	The policy should have positive impacts for biodiversity, open space, SDNP, heritage, air quality, greenhouse gas emissions, access, health, community safety, equalities, and economic development. Policy could have mixed impacts for transport and

reference to evaluating impacts on designated sites, including SDNP, LGS and nature.		adverse uncertain impacts for on a number of site-based objectives and would depend on the site developed.
Modification includes factual update to reflect LTP and national guidance.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM35 Travel Plans and Transport Assessments</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – policy amendments clarifying requirements for Transport Statements/ Transport Assessments in relation to Air Quality Management Areas to include consideration if development is outside AQMA; require proposals that cause significant noise/air quality impacts to submit a Construction and Environmental Management Plan; reference to impact of SRN to be considered in assessments in consultation with Highways England; amendment of wording from “should” to “to be required” relating to policy point 1 (all development which may result in significant movement); amendment of wording form “should” to “is required” relating to policy point 3 (major development in AQMA)	PROPSUB20	The policy should have significant positive impacts for transport, air/noise quality, and health, positive impacts for greenhouse gas emissions, making the best use of land, access, community safety and economic development and positive yet uncertain impacts for equalities.

Modifications include those to reflect status of locally derived standards and national policy, and improved clarity relating to the requirements for Air Quality Assessment.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
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<b>DM36 Parking and Servicing</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – Amendments to policy regarding requirements for development to be permit-free where overspill parking may be an issue; New policy point in support of car-free residential development, with additional supporting text; Guidance in supporting text regarding parking surveys; Supporting text references changed to zero exhaust emissions vehicles from ultra-low emissions vehicles and supporting infrastructure.	PROPSUB20	The policy should have significant positive impacts for transport and air quality, positive impacts for greenhouse gas emissions, making the best use of land, access, health, community safety, equalities and economic development.
Modifications include updates to ensure legal compliance with regards to parking standards, and to reflect council practice regarding car-free development.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM37 Green Infrastructure and Nature Conservation</b>
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Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
<p>Preferred Approach - Policy sections revised, with new sub-headings for “Green Infrastructure” and “Nature Conservation” to add clarity; GI to be integral to design and layout, and to achieve a variety of sustainability benefits; requirement for development to conserve and enhance, rather than protect and prevent damage to, features; also requires: net gains in biodiversity, protection of priority species/habitats; management secured; control of invasive species. Deletion of text “where possible”.</p> <p>Marine and coastal biodiversity, and geodiversity added to the list of features.</p> <p>Division of a) international, b) national, and c) local sites to aid clarity, with specific criteria which must be met for each including requirement for relevant assessments such as HRA or EIA. Clarity over criteria which does not apply to allocated local sites. All proposals must still ensure integrity of designations maintained, enhancement through management plans; and mitigation to result in net gains.</p>	<p>PROPSUB20</p>	<p>The policy is considered to have significant positive impacts for the biodiversity objective, and positive impacts for air quality, water quality, flood risk, climate change adaptation and mitigation, making good use of land, SDNP, and health. Impacts on the open space objective are mixed. Although this is change from the previous assessment, this does not reflect the change in policy, but reflects greater consideration against the relevant SA objective.</p>

<p>Deletion requirement for greater reductions in CO2 emissions and improvements to public appreciation of the site.</p> <p>Consequential changes to supporting text to reflect policy changes, reference to swift bricks/boxes, further reference to the mitigation hierarchy, clarification of the provision of on-site mitigation where possible, and confirmation of update of Nature Conservation SPD.</p>		
<p>Modifications include new overarching reference to the avoiding adverse impacts and reference to the mitigation hierarchy, clarity that BNG should be additional and measurable, change from priority to protected and notable species, reference to connecting habitats, reference to compliance with the Habitats Regulations in Part A; wording to ensure both the criteria of Part B are required to be met, plus change in wording from “loss” to “impacts and additional wording relating to the mitigation hierarchy and deletion of securing BNG in Part B; additional reference to MCZ assessment; amendments to Part C of policy to improve clarity relating to requirements for allocated sites, removal of wording “integrity” to show that development having any adverse impact will not be permitted, reference to providing off-site BNG as part of a local</p>	<p>PROPMOD22</p>	<p>Modifications proposed through examination process. No alternative option considered.</p> <p>Policy impacts the same as Proposed Submission stage.</p>

strategic ecological network added. Various amendments to supporting text including those to clarify BNG and exceptional circumstances.		
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<b>DM39 Development on the Seafront</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - amendments include: addition to criterion d) of access routes; reference in policy to Beachy Head West Marine Conservation Zone; additional supporting text referencing council work to improve access onto the beach; simplification of supporting text.	PROPSUB20	The policy should have significant positive impacts for biodiversity and open space, and positive impacts for air quality, water, flood risk and climate change adaptation, greenhouse gas emissions, SDNP and health.
Modifications include those to reflect status of local studies, reference to requirement for a MCZ and added cross reference to other relevant policy.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM40 Protection of the Environment and Health – Pollution and Nuisance</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: Inclusion in criterion e) to prevent biomass combustion and CHP plants being incorporated	PROPSUB20	Policy should have significant positive impacts air quality, and positive impacts for biodiversity, SDNP, water quality, soil quality, health and safety. Although the policy now prevents certain low/zero carbon technologies from being incorporated

<p>in/near to the AQMA or sensitive receptors; and f) to consideration of impact of lighting on biodiversity in particular priority habitat and species; additional supporting text clarifying NPPF guidance regarding air pollutants should be addressed through all developments; schools added as an additional example of a sensitive receptor within supporting text</p>		<p>in certain locations, this is not considered to have an adverse effect on objective concerned with reducing carbon emissions due to the other technologies available.</p>
<p>Modifications include those to reflect status of local guidance, combination of points (e) and (f) and amended wording to reduce ambiguity, deletion of word “outdoor” and additional consideration of health and amenity in policy point (g), consequential amendments to the supporting text, and factual updates to reflect new AQMA designations.</p>	<p>PROPMOD22</p>	<p>Modifications proposed through examination process. No alternative option considered.</p> <p>Policy impacts the same as Proposed Submission stage.</p>

<p><b>DM41 Polluted sites, hazardous substances and land stability</b></p>		
<p><b>Option/Alternatives Considered</b></p>	<p><b>Stage of preparation</b></p>	<p><b>Reasons for rejecting/selecting</b></p>
<p>Preferred Approach – amendments include: clarification that policy is seeking to protect natural capital and the quality of the environment.</p>	<p>PROPSUB20</p>	<p>Policy should have significant positive impacts for making the best use of land, positive impacts for water quality, soil quality, biodiversity, health and housing and economic development.</p>

Modifications to improve clarity of policy.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
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<b>DM43 Sustainable Drainage</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - Amendment to policy to: clarify that subterranean development if not permitted where other sources (in addition to groundwater) of flooding have occurred; clarify proposals should provide where possible improved biodiversity. Changes to supporting text to clarify certain types of SUDs more appropriate than others given aquifer.	PROPSUB20	This policy should have significant positive impacts on water quality, flood risk and climate change adaptation and positive impacts for biodiversity, open space, SDNP, heritage, soil quality, best use of land and health.
Modifications include those to reflect status of local guidance, and reference in supporting text regarding landscape-led approaches to sustainable drainage.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>DM44 Energy Efficiency and Renewables</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach - Policy amended to add flexibility for any future changes in building	PROPSUB20	This policy should have significant positive impacts for reducing greenhouse gas emissions and health, positive impacts for equalities and adverse but uncertain

<p>regulations. Inclusion of footnote; Additional policy paragraph to reflect council’s ambition to become carbon neutral by 2030 and to encourage all to improve energy efficiency; Confirmation that technical guidance will be prepared to clarify expectation regarding Energy Statements; Clarifications in supporting text to some aspects of implementation; Supporting text wording amended to confirm council will reduce rather than mitigate carbon emissions; Further detail added regarding spending of funds gathered through carbon offset scheme; Additional supporting text reflecting policy wording and council ambition to become carbon neutral.</p>		<p>impacts on some objectives due to the potential impacts that certain renewable technologies can have, including biodiversity, noise quality, heritage and SDNP.</p>
<p>Modifications include deletion of introductory sentence and replacement to show links to CP8, deletion of “all development”, addition of new residential dwellings and reference to Future Homes Standard in point (1); new policy point 2 relating to requirements for non-residential development with reference to Future Building Standards; amendments to points (3) and (4) for clarity, changes to supporting text relating to requirements for submission of an energy statements, explanatory text regarding FHS and FBS, explanatory text regarding demonstrating achievement of standards.</p>	<p>PROPMOD22</p>	<p>Modifications proposed through examination process. No alternative option considered.</p> <p>Policy impacts the same as Proposed Submission stage.</p>

<b>DM46 Heating and cooling network infrastructure</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – Amend policy to require that proposals ‘must’ meet CHP Quality Assurance standards, and demonstrate suitability to a future connection and reference to low-carbon heat networks for clarification.	PROPSUB20	This policy should have significant positive impacts on greenhouse gas emissions and positive impacts for heritage, waste and health. Impacts on air quality were adverse uncertain based on the potential for some CHP to have localised impacts.
Modifications include those to reflect status of guidance.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>SA7 Benfield Valley</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach: policy amended to include reference to enhancing wildlife connectivity and buffer zones; policy amended to encourage inclusion of older people’s housing; paragraph added to supporting text to reflect ANA designation and potential for archaeology; and additional text to ensure PROW are protected.	PROPSUB20	This policy should have significant positive impacts for housing, positive impacts for biodiversity, open space, heritage, waste, best use of land, access, health, community safety, equalities and economic development. Policy could have significant adverse impacts for landscape in the short term, significant adverse impacts for air/noise quality and mixed impacts for transport and climate change adaptation.

Modifications clarify the site areas and requirement for LVIA.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
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### Strategic Mixed Use Site Allocations – SSA1-SSA4 and SSA7

Strategic Mixed Use Site Allocations SSA1-SSA4 and SSA7		
SSA1 Brighton General Hospital site, Elm Grove, Brighton		
Preferred Approach - – amendments include: requirement for Heritage Impact Assessment added; amendments to criterion a) regarding enhancing the most significant non-designated heritage assets; amendment to criterion b) regarding creation of openings in the wall, for clarification; amendments to criterion c) regarding improving publicly accessible open space; f) and g) added to address waste water infrastructure requirements; criteria h) added to address site specific biodiversity and green infrastructure requirements (including swift colony). Consequential changes to supporting text.	PROPSUB20	Policy has potential for significant positive impacts for housing and health, positive impacts for biodiversity, open space, heritage, flood risk, climate change adaptation, water quality, soil quality, waste, best use of land, access, community safety, equalities and employment. Policy could have mixed impacts for transport and air quality.
Modifications includes those to reflect changes to use class order, provides clarity and further details with regards to heritage assets, provides additional details regarding safeguarding the swift colony.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>SSA2 Combined Engineering Depot, New England Road, Brighton</b>		
Preferred Approach - – amendments include: clarification of criterion g) to enhance setting of nearby heritage assets; inclusion of criteria i) in relation to waste water infrastructure requirements; Inclusion in supporting text to potential for contaminated land.	PROPSUB20	The policy was found to have potential for significant positive effects for the housing and employment objectives, positive effects for the biodiversity, open space, heritage, climate change adaptation, water quality, soil quality, best use of land, access, health, community safety and equalities objectives and could have mixed adverse/positive impacts for the objectives for transport and air/noise quality and adverse impacts for waste.
Modifications includes those to reflect changes to use class order, provides clarity and further details with regards to heritage assets, and sets out requirement for Heritage Impact Assessment.	PROPMOD22	Modifications proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
<b>SSA3 Land at Lyon Close, Hove</b>		
Preferred Approach – amendments include: addition to criterion d) in relation to biodiversity and green infrastructure requirements; Including of criterion h) and i) in relation to waste water infrastructure requirements; Inclusion in supporting text seeking SUDS and to potential for contaminated land and further guidance on design principles and nearby heritage assets.	PROPSUB20	The policy was found to have potential for significant positive effects for the housing, health and access objectives, positive impacts for the biodiversity, open space, heritage (streetscape), water quality, soil quality, flood risk, climate change adaptation, community safety, best use of land, equalities and economic development objectives. Policy could have mixed adverse and positive impacts for the objectives for transport and air/noise quality and adverse impacts on and waste.
Modifications reflect changes to the use class order.	PROPMOD22	Modifications reflect changes to the use class order and those proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>SSA4 Sackville Trading Estate, Hove</b>		
Preferred Approach — amendments include: amendment to criteria on air quality to strengthen requirements; Inclusion of criterion h) in relation to biodiversity and green infrastructure requirements; Including of criterion i) and j) in relation to waste water infrastructure requirements; Consequential amendments to supporting text and inclusion in supporting text to opportunities for SUDS and potential for contaminated land.	PROPSUB20	The policy was found to have potential for significant positive effects for the housing, employment, best use of land and access objectives, positive impacts for the biodiversity, open space, water quality, soil quality, flood risk, health, community safety and equalities and climate change adaptation objectives. The policy was found to have mixed adverse/positive impacts for the objectives for transport and air/noise quality and adverse impacts on waste.
Modifications reflect changes to the use class order, include new requirement relating to protection of groundwater, and factual updates relating to AQMA and adopted guidance.	PROPMOD22	Modifications reflect changes to the use class order and those proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
<b>SSA7 Land Adjacent to American Express Community Stadium, Village Way</b>		
Preferred Approach — — amendments include: inclusion of ancillary uses within mix of uses allowed; clarification that proposals should enhance heritage assets and provide visual connectivity to the South Downs National Park; removal from criteria e) of specific examples of creative landscape solutions; Consequential amendment to supporting text to address the setting of the National Park, provide information on the sites location within a Groundwater Source Protection Zone, inclusion	PROPSUB20	The policy was found to have potential for significant positive impacts for the economic development objective, positive impacts for the objectives for biodiversity, climate change adaptation, SDNP, heritage, sustainable transport, air quality, water quality, flood risk, making the best use of land, access to services, health and equalities.

of SUDS and reference to ensuring performance of Falmer interchange.		
Modifications include those to reflect the changes to the use class order, and reference to considering impacts through a Heritage Impact Assessment.	PROPMOD22	Modifications reflect changes to the use class order and those proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

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

Strategic Mixed Use Sites – Seafront Sites –SSA5 and SSA6		
Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
<b>SSA5 Madeira Terrace and Madeira Drive, Brighton</b>		
Preferred Approach – amendments include: Policy reference to refurbishment, restoration and revitalisation of terraces being a key council priority added; clarification on small/ boutique hotels; reference to cycling infrastructure added; Reference to event and shared space improvements; greater detail on biodiversity/ landscaping improvements, including reference to the Green Wall LWS; Consequential amendments to supporting text, including paragraph seeking SUDS; additional text clarifying funding available from the council for restoration.	PROPSUB20	The policy was found to have significant positive effects for the biodiversity, heritage, access and economic development objectives, positive effects across all other relevant objectives including access to open space, transport, air/noise quality, flood risk, waste, best use of land, health, climate change adaptation, community safety and equalities.

Modifications include those relating to changes to the use class order, additional wording to reflect heritage status of assets, provide additional context to uses that would be supported, and additional options regarding improving access.	PROPMOD22	Modifications reflect changes to the use class order and those proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.
<b>SSA6 Former Peter Pan leisure site (adjacent Yellow Wave), Madeira Drive</b>		
Preferred Approach - policy amended to clarify the main and ancillary uses permitted; additional criterion c) relating to density of development respecting the open character and allowing for sea views to be maintained; further detail on biodiversity improvements, including reference to the Volks Railway LWS. Consequential supporting text improvements. Supporting text added to clarify temporary consent granted for outdoor swimming pool on site	PROPSUB20	The policy was found to have significant positive impacts on biodiversity and economic development. The policy was found to have positive impacts across all other relevant objectives including open space, heritage, transport, noise quality, making the best use of land, access to services, health, and community safety.
Modifications include those to reflect the changes to the use class order, and factual updates regarding the heritage status.	PROPMOD22	Modifications reflect changes to the use class order and those proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>H1 Housing Sites and Mixed Use Sites (within BUA)</b>
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Option/Alternatives Considered	Stage of preparation	Reasons for rejecting/selecting
<p>Preferred Approach – amendments include:</p> <p>Requirement for development on some sites to align with sewerage network reinforcement and/or for layout to allow future access to water infrastructure.</p> <p>Additional supporting text highlighting the potential for contamination on some brownfield sites, and the need to protect groundwater resources when located within a GSPZ.</p> <p>Table 5: Residential Site Allocations, and Table 6: Mixed Use Allocations: quantum updated for some sites to reflect recent planning consents or other evidence. 5 sites removed as now commenced; 2 sites removed due to availability; 2 new sites added.</p> <p>Overall quantum total amended to 1,057 (residential) and 519 (mixed use) = total 1,576 (previously 1,609)</p>	<p>PROPSUB20</p>	<p>The policy was found to have potential for significant positive impacts for the housing, travel and access objectives, and positive impacts for the water quality, making best use of land, community safety, health, equalities and climate change adaptation objectives.</p> <p>Policy was found to have mixed impacts for economic development, biodiversity, heritage, flood risk, air quality, greenhouse gas emissions and soil quality.</p> <p>Impacts on waste were found to be adverse. Impacts on open space and the SDNP were found to be neutral.</p>
<p>Modifications include deletion of the word “minimum”, deletion of 8 sites, addition of 2 sites, amendment to quantum for 2 sites.</p> <p>Overall quantum amended to 752 (residential) and 479 (mixed use). Other modifications to reflect changes to use class order.</p>	<p>PROPMOD22</p>	<p>Modifications reflect changes to the use class order, availability or development progress on sites, and those proposed through examination process. No alternative option considered.</p> <p>Policy impacts the same as Proposed Submission stage with the exception of air quality, which although still found to have mixed impacts, were found to have reduced adverse impacts due the reduced number of sites having air quality issues.</p>

<b>H2 Housing sites – urban fringe</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
<p>Clarification that the developable areas of the sites are allocated for housing. Cross references to SA4 and SA5 within policy text. Clarification that percentages for family housing are indicative.</p> <p>New criteria d) requires adverse biodiversity impacts to be mitigated and net gains provided.</p> <p>New criteria e) requirements for sustainable transport infrastructure added; Criteria h) amended to reflect carbon neutral ambition encouraging development to achieve greater CP2 reductions; New criteria i) requiring self/custom built plots unless unviable;</p> <p>Explanation of additional criteria relating to phasing of development with sewerage network reinforcement and planning layout to ensure future access to water infrastructure.</p> <p>Table updated: some quantums amended; some clusters of sites split into two sites to reflect recent planning consents with consequential amendments to site area and quantum; key site consideration amended to reflect updated evidence.</p>	<p>PROPSUB20</p>	<p>Policy should have significant positive impacts for housing; positive impacts for water quality, reducing greenhouse gas emissions, making the best use of land, community safety and equalities; mixed impacts for transport/travel, access and health, biodiversity, open space, SDNP, heritage, air/noise quality, flood risk and climate change adaptation. Many of the mixed impacts reflect the positive aspirations of the policy, but the on-site risks associated with development. Policy was found to have neutral impacts for soil quality, waste and economic development.</p>

Supporting text amended to include further justification on the proportion of family housing to be sought; reference to seeking biodiversity net gains in site allocations; further explanation regarding energy efficiency; reference to design and materials reflecting the Integrated Landscape Character Assessment; reference to ecological survey requirements relating to designated biodiversity sites; reference to some sites being within GSPZ; reference to the potential for contamination on some sites; protect and enhance PROW		
Modifications include deletion of reference to “potential” and replacement with “indicative”; deletion of 1 site; amendment to quantum for 1 sites. Reference to expectation for all sites to include plots for self-build housing.	PROPMOD22	Modifications reflect deliverability of site and changes proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage.

<b>H3 Purpose Built Student Accommodation</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach – amendments include: clarification of indicative numbers of bedspaces in policy wording and table; additional PBSA site allocated.	PROPSUB20	This policy should have significant positive impacts for housing and transport, positive impacts for air quality, greenhouse gas emissions, best use of land, and access, mixed impacts for health, climate change adaptation and soil quality, and adverse impacts for water quality, flood risk and waste.

Modifications include deletion of 1 site, change of quantum for 1 site, additional reference to protection of groundwater resources.	PROPMOD22	Modifications reflect deliverability of site and changes proposed through examination process. No alternative option considered.  Policy impacts the same as proposed submission stage with the exception of water quality, which is now considered to be positive.
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<b>E1 Opportunity site for business and warehouse uses</b>		
<b>Option/Alternatives Considered</b>	<b>Stage of preparation</b>	<b>Reasons for rejecting/selecting</b>
Preferred Approach –no change to policy; changes to supporting text recognising the LWS designated sites on part and adjacent to the site.	PROPSUB20	The policy should have significant positive impacts for economic development, positive impacts for waste, making the best use of land, health and equalities, adverse impacts for open space, SDNP, transport, flood risk and climate change adaptation, and mixed impacts for biodiversity and air/noise quality.
Modifications including those to reflect changes to the use class order, amended reference to ensure consistency with DM37 regarding mitigation and BNG, and additional reference to design and the SDNP.	PROPMOD22	Modifications reflect changes to the use class order and those proposed through examination process. No alternative option considered.  Policy impacts the same as Proposed Submission stage with the exception of impacts on landscape which are now considered to be mixed, progressing to positive in the longer term.

## Appendix E 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

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site. Does not contain and is not adjacent to any nature conservation designations, nor does it contain any BAP priority habitats/species, nor sites with potential for nature conservation interest. Site could offer potential for nature conservation enhancement through redevelopment of the site.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	No open space on site. Site will not result in loss of open space and unlikely to result in increase in open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city’s historic built environment, heritage assets and their settings,	--	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 dcbels 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>
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**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.

<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 loss 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>
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**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 carpark 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 loss 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 exiting adjacent uses and enable them to operate.</p>
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	++	Site is PDL. Site is situated entirely within Flood Zone 1. None of site has any risk of surface water flooding. No risk of groundwater flooding.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site not within or proximity to a potential heat network cluster. Approved scheme includes solar PV.
10. To increase the city's resilience and ability to adapt to climate change.	0	PDL site with no flood risk. Approved scheme does not include any measures that would support climate change adaptation.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former/current uses.
12. To minimise and sustainably manage waste	--	Part of site currently vacant. Approved scheme would involve production of demolition waste and would not provide the opportunity to re-use existing resources.
13. To make the best use of land available.	++	Development of site provides opportunity to redevelop a partly vacant site (staff accommodation block) and make better use of the site. Approved scheme would provide a site density of 450dph which exceeds CPP1 density targets.

14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Development would provide 18 dwellings, including 7 affordable units and 1 wheelchair accessible unit.
15. To improve the range, quality and accessibility to services and 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>
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**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>
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**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 loss 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>
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**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 loss 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 soundproofing.
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 cold 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>
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**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 loss 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>
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**SA site assessment: Land at corner of Fox Way and Foredown Road, Mile Oak (updated to reflect change in quantum)**

<b>Site Description</b>	A privately owned greenfield site consisting of designated open space of the amenity greenspace typology within the built-up area boundary.
<b>Site Area</b>	0.2ha
<b>Current Use</b>	Amenity greenspace with no public access.
<b>Potential Use</b>	Potential to deliver 14 dwellings (increased from 10)

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site does not contain nor is adjacent to any ecological designations. Site is greenfield and could have some potential for ecological interest.

2. To protect and improve open space and green infrastructure and improve sustainable access to it.	-	Site is privately owned designated open space (amenity grassland) which would be lost through development.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site in close proximity to SDNP; separated from the SDNP by Fox Way road. Site therefore in a prominent position in relation to the SDNP however is within an existing established residential setting.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to any designated heritage assets and has no known archaeological potential.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-	Close access to a bus stop, with regular services. Some services within acceptable walking distance. However, site situated in location where private car could be the preferred mode of transport.
6. To reduce air and noise pollution.	++	Site not within AQMA and does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	-	Site has small area (5%) at low risk of surface water flooding. Groundwater levels at least 5m below surface. SFRA considered site to be of low flood risk overall. Site is greenfield and development of the site would result in an increase in urbanised form.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	--	Site is greenfield in nature and will provide ecosystem services such as temperature regulation and water absorption. Development of the site would result in an increase in urbanised form. Site size may mean that no greenfield functions / ecosystem services can be retained on site.
11. To improve soil quality	0	Site presumed not to be contaminated.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.

13. To make the best use of land available.	+	A site density of 70dph would be achieved if 14 dwellings are provided. It is unknown whether this would enable any ecosystem services to be retained on site, however, would meet CPP1 minimum density targets.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Site has outline consent to deliver 14 dwellings. This should include 30% affordable.
15. To improve the range, quality and accessibility to services and facilities.	+	Site has good access to public transport. Some services located within desirable walking distance including playground (150m), primary school (560m) and secondary school (970m). Local centre/shops (600m) and health facilities (1,200m) both located at preferred maximum.
16. To improve health and well-being, and reduce inequalities in health.	+	Site has good access to public transport. Some services located within desirable walking distance including playground (150m), primary school (560m) and secondary school (970m). Local centre/shops (600m) and health facilities (1,200m) both located at preferred maximum. Development of site would result in loss of open space, however this is privately owned with no access and therefore should not impact physical activity. Site has good air and noise quality.
17. To improve community safety, and reduce crime and fear of crime.	++	Site located within 50% most deprived SOA (crime domain). Site has good access to public transport.
18. To increase equality and social inclusion	+	Site capable of delivering 30% affordable housing. Site not located within an area of employment (10% least) and education (50% least) deprivation however is adjacent to some areas with higher deprivation.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site to deliver housing only. Development of site will not result in loss of any land in employment uses.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Mixed</p>	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: designated heritage assets and archaeology as does not contain any; air quality as not within a AQMA; noise quality as site does not suffer from high levels of road noise; groundwater quality as not within a GSPZ; soil quality as site unlikely to be contaminated; community safety as site not within an area that has high crime deprivation; access and health due to proximity to most services; development of the site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site; economy as development would not result in any loss of employment land</p> <p>Potential adverse effects: Redevelopment of site would involve loss of open space of the amenity grassland typology, although it is noted that this is privately owned with no public access. Loss of open space on the site would increase the amount of urbanised land on site, which can impact upon climate change adaptation. Small part of the site has a low risk of surface water flooding however the SFRA considered site to be of low flood risk overall. Site could have some ecological interest due to the greenfield nature of the site. Site is in close proximity to the SDNP and could have landscape sensitivities, although it is adjacent to an existing residential area. Although site has good access to public transport and some services, its location on the edge of the city could impact upon car ownership and mode of travel. Site not located within a heat network opportunity area.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing and could provide 14 dwellings, 30% of which would be affordable. Delivery of 14 dwellings would provide a site density of 70dph which meets minimum requirements helping to make good use of sites in the city. Development of the site may also provide employment/training opportunities for adjacent employment and education deprived communities.</p>
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**SA site assessment: 71-76 Church Street, Brighton (updated to reflect change in quantum)**

<p><b>Site Description</b></p>	<p>A brownfield site consisting of 4-storey Grade II listed building with rear warehouse and car-parking area, occupying a corner position within central Brighton.</p>
<p><b>Site Area</b></p>	<p>0.21ha</p>
<p><b>Current Use</b></p>	<p>Currently occupied by Patrick Moorhead Antiques (trade premises for antiques storage/showroom)</p>

<b>Potential Use</b>	Potential to deliver 10 dwellings (reduced from 50) with some employment floorspace in the northern part of the site
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<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 loss and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	--	The building, including the rear warehouse is Grade II listed and is within the North Laine Conservation Area. Adjacent to Brighton historic core ANA. It is noted that the reduction in the number of units proposed, from 50 to 10 units is a response to the heritage status of the building.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Site has very good access to both bus and rail services. Some services within walking distance from the site. Central location could mean the suite has potential to deliver car-free housing.
6. To reduce air and noise pollution.	--/+	Site within AQMA. Delivery of 10 dwellings and employment floorspace could increase the amount of daily light vehicle movements that could have an effect on air quality in this location. Site does not suffer from high levels of road noise.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within zones 1, 2 or 3 of a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	Entire site is PDL. There is no risk of flooding from surface water on the site. Groundwater levels at least 5m below surface.

9. To reduce emissions of greenhouse gases that cause climate change	+	Site is within the Brighton Centre Heat Network Opportunity Area. Heritage assets may impact on the ability to incorporate some LZC technologies.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanised area of the city.
11. To improve soil quality	0	Site presumed not to be contaminated, based on former uses.
12. To minimise and sustainably manage waste	+	Site currently in use. Redevelopment would facilitate the adaptive re-use of the building and therefore preserve resources and reduce production of waste.
13. To make the best use of land available.	+	Redevelopment will help to facilitate adaptive re-use of existing buildings and make good use of land resources. Delivery of 10 dwellings would equate to a site density of 48dph. Although this does not meet density targets, this reflects the building's heritage status.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	Potential to deliver 10 dwellings. This should incorporate affordable dwellings at a rate of 30%
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (350m). Health services (580m) and secondary schools (2,500m) within acceptable walking distance.
16. To improve health and well-being, and reduce inequalities in health.	+	Good access to majority of services. Most services within desirable walking distance including primary school (450m), shops (<100m), playground (350m). Health services (580m) and secondary schools (2,500m) within acceptable walking distance. Development of site will not result in loss of open space, however site is within the AQMA which could impact upon amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	-	Site situated within 10% most deprived SOA (crime domain). Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.
18. To increase equality and social inclusion	++	Site capable of delivery 40% affordable housing. Site within 30% most deprived SOA (employment domain) and 30% least deprived SOA (education domain). Site could provide training opportunities for locally deprived individuals.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	++	Site currently used as antiques trade centre. Site is not currently in employment use. Delivery of some commercial floorspace (E(g)) would provide new land for employment uses within a central accessible location.

<p><b>Overall Summary and Policy Considerations</b></p>	<p>Largely positive /no impacts</p>	<p>No issues: Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; SDNP due to situation within existing urban context; road noise as does not suffer from high levels of road noise; transport due to proximity to sustainable transport and services; water quality as site not within GSPZ; soil quality, as unlikely to be contaminated based on current use; flood risk as site not at risk of tidal, fluvial or surface water flooding and groundwater levels more than 5m below surface; climate change adaptation as site entirely PDL and will not result in an increase in urbanised form; access and health due to proximity to services.</p> <p>Potential adverse effects: Development of the site could raise issues with heritage as the site is a Grade II listed building within a conservation area. Site also adjacent to an ANA. Site is within the AQMA and any traffic to and from the site would need to travel through the AQMA and the amount of development could result in an increase in vehicle movements that would have a significant effect on air quality. The site is situated within a SOA that has high crime deprivation which would require consideration e.g. through opportunities to design out crime.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 10 dwellings are provided this should include 30% affordable units. Redevelopment of the existing building would facilitate adaptive re-use, help to preserve resources and reduce waste. Delivery of 10 units on site would achieve a site density of 48dph, therefore not meeting minimum density targets; this is in recognition of the building's heritage status, however, would still facilitate adaptive re-use. A scheme in this location has potential to be car-free. The site is situated within a heat network cluster area and could and could incorporate energy saving technologies subject to heritage constraints. Development could include green infrastructure which would support climate change adaptation and provide opportunities for nature conservation enhancement. Delivery of employment floorspace would increase employment land in a sustainable location and may also provide employment/training opportunities for locally deprived communities. Having more active mix of uses on this site (e.g. employment at ground floor could increase passive surveillance and support community safety.</p>
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## 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>
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**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>
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## 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
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**SA site assessment: Site 46A Land at former nursery site, west of Saltdean Vale, Saltdean**

<b>Site Description</b>	A privately owned urban fringe site, previously used as a nursery and comprised of green houses, grassland areas and scrub.
<b>Site Area</b>	0.83ha
<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 party of managed grassed areas and dense scrub, which UFA 2015 found to be of relatively low ecological value. No biological records of protected or notable species on the site although habitats on site could provide potential for such species. Site is adjacent to Looes Barn Woodland LWS which could be impacted through increased recreational pressure. UFA 2015 found that ecological value of site could be enhanced through green infrastructure.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Site does not contain any designated open space.
3. To protect, conserve and enhance the South Downs National Park and	-	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>

### H3 Updated Site Assessments

#### SA site assessment: 39-47 Hollingdean Road, Brighton (updated to reflect change in quantum)

<b>Site Description</b>	The site incorporates a vacant building fronting Hollingdean Road and the rear of the site which includes a separate building currently used as vehicle repairs and an area of hard standing.
<b>Site Area</b>	0.09ha
<b>Current Use</b>	Vacant retail unit; vehicle repair workshop and storage yard (sui generis)
<b>Potential Use</b>	Purpose Built Student Accommodation – 99 bedspaces (increased from 40).

<b>SA Objective</b>	<b>Score</b>	<b>Commentary</b>
1. To protect, conserve and achieve a net gain in biodiversity.	++	PDL site which does not contain and is not adjacent to any nature conservation designated sites. Nearest designated site (LWS) c.150m (across Lewes Road) and unlikely to be affected by development. Does not contain BAP habitat nor sites with potential for nature conservation interest. Site may have potential for nature conservation enhancement.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	0	Development of this site will not result in either loss and is unlikely to result in on site gains in public open space.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	0	Site is within core urban area and is not visually prominent from the SDNP.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	0	Site is not within or adjacent to any designated heritage assets. Site has no potential for archaeology. Round Hill Conservation Area is c.70m from the south of the site, however, is beyond the existing Sainsbury's access ramp. The ground level of the site is lower than the heritage assets and therefore development in this location is unlikely to be visible and effect the setting, unless a significantly tall building is proposed. A development providing a 40 bedspaces is unlikely to be significantly tall.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	++	Very good access to regular bus services and good access to train station. Shops within less than 100m and health facilities less than 400m and considered to be within walking distance.

6. To reduce air and noise pollution.	--/+	Site located entirely within AQMA. Any traffic travelling to the site would need travel through the AQMA. However, development of site for PBSA is unlikely to generate change in vehicle flow which would significantly impact upon air quality in this location. Road noise levels less than 55dcbLs therefore no impact. Proposed use of site is for PBSA which could result in noise amenity impacts for adjacent residents although it is recognised the site is in a predominantly mixed use area.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site located within GSPZ 1.
8. To reduce the risk from all sources of flooding to and from development	-	PDL site. Parts of site have a risk of surface water flooding, including 7% at high risk, 52% at medium risk and 70% of low risk. GW levels between 0.5 to 5m below surface. Although the site does have flood risks, the SFRA did not consider the site to require further consideration by the sequential/exception tests due to a locally set threshold of the area at risk being less than 1,000m <sup>2</sup> .
9. To reduce emissions of greenhouse gases that cause climate change	+	Site located in fairly close proximity to Brighton University Heat Network Opportunity Area although may not be able to connect. Development of PBSA provides good opportunity to incorporate communal heating.
10. To increase the city's resilience and ability to adapt to climate change.	+	Site is PDL and of an urbanised form. Redevelopment will not result in loss of green infrastructure, or further increase urbanisation of the city.
11. To improve soil quality	+	Geo-environment report undertaken for recent planning application indicates site has potential for contamination based on current use. This therefore provides an opportunity for remediation.
12. To minimise and sustainably manage waste	--	Unlikely to make use of existing resources on site through redevelopment.
13. To make the best use of land available.	+	Although redevelopment is unlikely to facilitate adaptive re-use of existing buildings, redevelopment would make good use of the site, some of which is currently vacant.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	++	Site could provide 99 student bedspaces and would contribute towards meeting the need for purpose built student accommodation. Could also help to free up family-sized housing.
15. To improve the range, quality and accessibility to services and facilities.	++	Good access to services. Services within desirable walking distance including shops (c.100m), health (c.350m) and open space (c.190m). Access to schools would not be a consideration for this type of development. Site also has good access to public transport.

16. To improve health and well-being, and reduce inequalities in health.	++	Good access to services. Services within desirable walking distance including shops (c.100m), health (c.350m) and open space (c190m). Access to schools would not be a consideration for this type of development. Site also has good access to public transport. Site will not result in loss of open space. Site is located within AQMA which would need careful design.
17. To improve community safety, and reduce crime and fear of crime.	-	Site can be safely and easily accessed. Site located within 20% most deprived SOA (crime domain). Opportunities to design out crime would need to be incorporated on site.
18. To increase equality and social inclusion	++	Site has potential to deliver housing for particular community (students). Site situated within 10% most deprived SOA education domain and 10% most deprived employment domain and could therefore offer opportunities to provide training-based skills.
19. To contribute towards the growth of a sustainable and diverse economy increase employment opportunities and meet local employment needs.	0	Site identified for PBSA. Redevelopment would result in loss of land currently in sui generis uses.
<b>Overall Summary and Policy Considerations</b>	Mixed	<p>Development of the site is unlikely to raise any issues with the following objectives: biodiversity as the site does not contain nature conservation designations or BAP habitats; open space as site does not include designated open space; road noise, as not subject to high road noise; SDNP due to situation within existing urban context; heritage as the site does not contain and is unlikely to impact on proximate assets; transport due to proximity to sustainable transport and services; climate change adaptation as site currently PDL and development would not result in loss of green infrastructure or increase urbanised nature of the city; access and health due to proximity to services; and economy as development would not result in loss of employment land.</p> <p>Potential adverse effects: Development of the site could raise issues with air quality, as the site is within the AQMA and can only be accessed via the AQMA, however it is recognised that PBSA in this location is unlikely to generate an increase in average daily vehicles which would affect air quality. The site is within a GSPZ1 and construction could pose a risk to water quality. Parts of the site has varying levels of surface water flood risk, and groundwater levels are between 0.5-5m below surface, however the SFRA did not require consideration by sequential/exception test. In addition, development of site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings. Site is within an area of high crime deprivation and should incorporate opportunities to design out crime.</p> <p>Potential positive impacts:</p>

		<p>Development of the site for PBSA would have positive impacts for housing both through the provision of student accommodation but also through relieving pressure on the existing housing market. Development of the site would have positive impacts for making the best use of land, particular as some buildings on site are currently vacant. Development of the site may provide opportunities for nature conservation enhancement. Although not within a Heat Network Cluster Area, PBSA provides the opportunity to use energy more efficiently e.g. through communal heating schemes, supporting climate change mitigation. Redevelopment of the site should result in remediation of contaminated land. Development could provide training/employment opportunities for communities suffering from high levels of education/employment deprivation.</p>
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## 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 loss 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>
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**SA site assessment: Land between Marine Drive and to the rear of 2-18 The Cliff, Brighton (H1 site)**

(Nb: site assessment reflects proposal to deliver 10 units as proposed in the Submission CPP2).

<b>Site Description</b>	A greenfield site designated as open space, within the built-up area boundary, adjoining an area of predominantly residential uses. The site forms part of a green strip that runs alongside the A259 extending from Brighton to Rottingdean. Entire site comprised of the Cliff Road Paddock LWS.
<b>Site Area</b>	0.94ha
<b>Current Use</b>	Designated open space (natural/semi-natural typology)
<b>Potential use</b>	The site was originally allocated as an H1 site for delivery of 10 housing units. Uncertainty was raised during the Examination as to whether this could be delivered due to the site's designation as a Local Wildlife Sites.

SA Objective	Score	Commentary
1. To protect, conserve and achieve a net gain in biodiversity.	-	Site is a recently designated LWS, designated for chalk grassland and reptile population. Some BAP species recorded on site. Site likely to be within Impact Risk Zone for Black Rock to Newhaven SSSI, however as this

		designation is predominantly geological, this is not considered to pose a risk of significant adverse effect for biodiversity. Although the amount of development proposed reduced between draft and Proposed Submission stages 16 to 10 units, there is still uncertainty with regards to the impacts on the wildlife designation due to their having been no ecological assessment undertaken.
2. To protect and improve open space and green infrastructure and improve sustainable access to it.	--	Development of site would result in loss of publicly accessible open space of natural/semi-natural typology.
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it.	-	Site in fairly close proximity to SDNP and development could be visible from SDNP possibly having landscape impacts. However, site situated within an urban context, including being within close proximity to tall buildings which is likely to limit significant visual impacts.
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites.	-	Site is not within or adjacent to any designated heritage assets, however, is within the Roedean ANA and development could have impacts on archaeology.
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice.	-/+	The site has fairly good access to a frequent bus service and to a local centre (c.500m). However, does not have close access to secondary schools or health facilities and is located in an area of the city where the car is likely to be the preferred mode of transport.
6. To reduce air and noise pollution.	-/++	Site not within AQMA and development of site unlikely to generate change in average vehicle flow which would significantly impact upon air quality. However, site adjacent to A259 and subject to road noise exceeding 55 dbcls which could impact on occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	++	Site not within a GSPZ.
8. To reduce the risk from all sources of flooding to and from development	+	Greenfield site. Within flood zone 1. No flooding incidents on site. No risk of surface water flooding on site. Groundwater levels at least 5m below surface. Site is located within surface water conveyance zone.
9. To reduce emissions of greenhouse gases that cause climate change	+	Site within close proximity to Brighton Marina heat network opportunity area and could have potential to connect to a heat network. Site could also have potential to incorporate low/zero carbon infrastructure.
10. To increase the city's resilience and ability to adapt to climate change.	-	Development of greenfield sites into an urbanised form can increase risk of flooding/urban heat island effect. However, this site offers the possibility of retaining some greenfield functions, such as water absorption and temperature regulation i.e. if some open spaces retained on site (e.g. through a low-density scheme).
11. To improve soil quality	0	Site is not known to be contaminated. Site does not contain any agricultural land.

12. To minimise and sustainably manage waste	0	Greenfield site/open space with no building on site.
13. To make the best use of land available.	+	Site is greenfield. If the site delivers 10 units, this will provide a dwelling density of 11dph, less than the 50dph expected through CPP1 CP14. However, a low-density scheme may be required to ensure that any impacts on biodiversity are mitigated appropriately, and may provide the opportunity to retain some greenfield functions as well as open space on site which would have wider benefits.
14. To provide housing, including affordable housing, to contribute towards meeting local needs.	+	SHLAA analysis indicates 10 dwellings could be delivered on site. This should include 30% affordable housing and may be a site which could provide an element of family housing.
15. To improve the range, quality and accessibility to services and facilities.	+	Some services considered to be within acceptable walking distance including shops (c.400m), primary school (c.1,050m) and open spaces (c.350m); however some more than preferred maximum including health (c.1,300m) and secondary schools (c.4,100m). In addition, opportunities to walk/cycle to some facilities could be limited due to topography and/or volume of road traffic.
16. To improve health and well-being, and reduce inequalities in health.	+	Some services considered to be within acceptable walking distance including shops (c.400m), primary school (c.1,050m) and open spaces (c.350m); however some more than preferred maximum including health (c.1,300m) and secondary schools (c.4,100m). In addition, opportunities to walk/cycle to some facilities could be limited due to topography and/or volume of road traffic. Any loss of on-site open space could impact upon health, e.g. through reducing ability for physical activity/impacts on mental well-being although it is recognised the site has good access to other opportunities for recreation. Site could suffer from noise issues which could impact upon occupier amenity and health.
17. To improve community safety, and reduce crime and fear of crime.	+	Site is safely accessible by limited number of transport modes. Site situated within 30% most deprived SOA (crime). Site may provide opportunities for community interaction (e.g. open space?) although is unlikely to support a wider range of uses.
18. To increase equality and social inclusion	++	Site has potential to deliver 40% affordable dwellings. Site located in fairly close proximity to an area of employment and education deprivation and may offer jobs/skills opportunities.
19. To contribute towards the growth of a sustainable and diverse economy .	0	Site is identified for housing only.
<b>Overall Summary and Policy Considerations</b>	Mixed	No issues: Development of the site is unlikely to raise any issues with the following objectives: designated heritage assets as none or near site; air quality as site located outside the AQMA; water quality as site located outside a GSPZ; flood risk as there is no risk of tidal/surface water flooding on site and groundwater levels are more than 5m below surface; soil quality as site unlikely to be contaminated; access as some services are located in walking distance from the site; economy as development would not result in loss of employment land. Development of

	<p>site will not provide the opportunity to minimise waste e.g. through adaptive re-use of buildings, as there are none of site.</p> <p>Potential adverse effects: Development of the site could raise issues with biodiversity due to LWS designation and the greenfield nature of site, loss of open space, landscape due to proximity to SDNP, archaeology as site within ANA, and climate change adaptation as would result in urbanisation of a greenfield site. In addition, road noise is an issue on the site. Site is located in an area where the car may be the preferred mode of transport. Loss of open space could also impact upon health, as could adjacent road noise.</p> <p>Potential positive effects: Development of the site would have positive impacts for housing. If 10 housing units are provided, this should include 30% affordable and the site may be suitable for family-type housing. Although delivery of 10 housing units would provide a site density of 11dph which is less than 50dph expected by CP14, this may be required to ensure that any biodiversity impacts are mitigated, however this is unknown without having had any ecological assessment. This amount may enable some greenfield functions/ecosystem services to be retained on sites, such as open space offering potential for community interaction and thus supporting community safety, SUDS and flood prevention measures having wider environmental benefits. The site may provide opportunities to incorporate low/zero carbon infrastructure and development may provide employment/training for adjacent deprived communities.</p>
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**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).
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<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 dbbls which could impact upon occupier amenity.
7. To improve water quality (ecological, chemical and quantity status)	--	Entire site within GSPZ 2 and therefore development could impact upon water quality.
8. To reduce the risk from all sources of flooding to and from development	--	Site consists of open spaces which provide greenfield functions. Site situated within flood zone 1.  None of allocated site has any risk of surface water flooding, however immediately adjacent there is a high risk (1 in 30-year event) of flooding on part of the area that forms the outdoor sports pitch, with susceptibility to ponding. Development on the allocated site could increase flood risk to this area due to the increase in urbanised form and conveyance.  Groundwater levels between 0.025m and 5m below surface which poses a high risk of groundwater flooding.  SFRA suggests it should be subject to sequential and exceptions test due to the proportion of the site with groundwater levels between the surface and 0.5m below surface.
9. To reduce emissions of greenhouse gases that cause climate change	-	Site not within a heat network opportunity area.
10. To increase the city's resilience and ability to adapt to climate change.	-	Site is entirely open space and therefore some greenfield functions (such as water absorption/temperature regulation) will be lost through development. However undeveloped parts of site (c.82% of site) will retain greenfield functions.
11. To improve soil quality	0	Site not known to be contaminated.
12. To minimise and sustainably manage waste	0	Site is open space with no existing buildings on site.
13. To make the best use of land available.	+	A housing density of 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.
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.

<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: 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 impact 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</p>
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		could increase activity which can provide passive surveillance and support community safety. Development could provide employment/training for nearby employment/skills deprived communities.
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## Appendix E List of sites no longer being allocated

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
Land between Marine Drive and to the rear of 2-18 The Cliff, Brighton	H1	Uncertainty regarding deliverability of site
Site 16 Horsdean Recreation Ground	H2	Not considered suitable for development
118-132 London Road, Brighton	H3	Development underway/complete



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