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at Brighton & Hove City Council

City Plan Part Two Sustainability Appraisal Non-technical summary

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Brighton & Hove
City Council

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Section 1 Introduction

1.1 Purpose of this report

- 1.1.1 This document forms the Non-Technical Summary of the Sustainability Appraisal (SA), incorporating the requirements of the Strategic Environmental Assessment Directive¹ and Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)², of the draft City Plan Part Two (CPP2) Development Plan Document.
- 1.1.2 The requirement for a Non-technical summary is set out in part 10 of Schedule 2 of the Regulations and must include a summary of the following information:
- An outline of the contents and main objectives of the Plan
 - The relevant aspects of the current state of the environment and likely evolution without implementation of the Plan
 - The environmental characteristics of areas likely to be significantly affected
 - Any existing environmental problems including those relating to areas of particular importance
 - The environmental protection objectives which are relevant to the Plan
 - The likely significant effects on the environment
 - The measures envisaged to prevent, reduce and offset significant effects
 - An outline of why the alternatives were selected and a description of how the assessment was undertaken
 - A description of the measures to monitor implementation of the Plan

1.2 Requirement for Sustainability Appraisal and Strategic Environmental Assessment

- 1.2.1 The Planning & Compulsory Purchase Act 2004 requires that a Sustainability Appraisal (SA) is carried out for all Development Plan Documents (DPD). As the City Plan Part 2 sets a framework for development consent of projects that are likely to have significant environmental effects, a Strategic Environmental Assessment (SEA), as required by the EU Directive and the relevant Regulations, is also necessary. The National Planning Policy Framework (NPPF) also states that an SA, incorporating the requirements of the SEA Directive, is integral to the plan making process.
- 1.2.2 SA is a systematic and iterative process that attempts to predict and assess the economic, environmental and social effects that may arise from a plan, with a view to avoiding and mitigating adverse impacts and maximising positive impacts where appropriate. It plays an important role in demonstrating that a DPD is contributing towards sustainable development through the integration of environmental, social and economic considerations into the DPD.
- 1.2.3 SEA introduces a systematic assessment of the environmental effects of plans or programmes, including land use plans. Its objective is “to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development, by ensuring that, in accordance with the Directive, and environmental assessment is carried out on certain plans which are likely to have significant effects of the environment.” It also requires the consideration of reasonable alternatives, to help demonstrate that the final plan is the most sustainable approach.
- 1.2.4 Although the requirements of SA and SEA are distinct, a single joint appraisal incorporating SA and SEA requirements can be carried out, in accordance with National Planning Practice Guidance, ensuring that all issues are considered. From herein, the main report will be referred to solely as the Sustainability Appraisal (SA).

¹ European Directive EC/2001/42

² [Environmental Assessment of Plans & Programmes Regulations 2004](#)

Section 2 Outline of Contents of CPP2

2.1 City Plan Part 1

2.1.1 Brighton & Hove City Council is the local planning authority responsible for preparing the development plan for the city. The development plan currently consists of the City Plan Part One (adopted March 2016)³ and saved policies from the Local Plan (2005). The City Plan Part One sets the overall strategy for the development and growth of Brighton & Hove up to 2030, sets out strategic objectives, identifies 8 locations for major development and allocates strategic sites. It also identifies the urban fringe as a broad location for development. The City Plan Part One also sets some policies that guide decisions on planning applications.

2.1.2 City Plan Part One underwent its own SA process as part of its preparation which included an assessment of options for growth, assessment of a revised spatial strategy including development on the urban fringe, and assessment of options and policies. The City Plan Part 1, Sustainability Appraisal and all relevant accompanying background information was assessed by an independent planning inspector between the period 2013 to 2016 and was found sound.⁴ The SA at this stage therefore does not re-assess the strategic approach to growth or any policies included with City Plan Part 1.

2.2 City Plan Part 2

2.2.1 The draft City Plan Part Two allocates some additional strategic sites that have become available since the preparation of City Plan Part One, includes an additional special area policy where a co-ordinated approach to development is required, allocates smaller sites for various uses, such as housing and employment, and includes more detailed policies that will be used for the determination of planning applications.

2.2.2 CPP2 contains the following:

- 46 Development Management covering the following topics
 - Housing, Accommodation and Community
 - Employment, Tourism and Retail
 - Design and Heritage
 - Transport and Travel
 - Environment and Energy
- Special Area Policy for Benfield Valley
- 7 Strategic Site Allocations for the following sites:
 - Brighton General Hospital
 - Combined Engineering Depot, New England Road
 - Land at Lyon Close
 - Sackville Trading Estate and Coalyard
 - Madeira Terraces and Drive
 - Former Peter Pan Leisure Site, Madeira Drive
 - Land adjacent to American Express Community Stadium
- 45 Housing and Mixed Use site allocations within the built up area boundary
- 14 Housing site allocations on the urban fringe
- 2 Purpose Built Student Accommodation site allocations
- 1 Opportunity site for new business and warehouse uses

2.2.3 Once adopted, the City Plan Part Two will replace the saved policies from the Local Plan 2005, and together with the City Plan Part One, will form the Development Plan for the city.

³ [City Plan Part 1](#)

⁴ [City Plan examination documents](#)

Section 3 Links to Other Plans and Programmes

3.1 Review of plans, programmes and policies

3.1.1 Plans, programme and policies of relevance to CPP2 were reviewed at Scoping Stage 2016 and published in the SA Scoping Report 2016. These must be taken into account during the preparation of CPP2. This includes European legislation as well as national legislation including the NPPF, regional policy and local strategies.

3.1.2 Key messages and objectives that CPP2 must support include:

- Protect, conserve and enhance the **natural environment**
- Conserve and enhance locally and nationally **designated sites of nature conservation** importance
- Protect and improve **water quality**
- Reduce pressure on **water resources**
- Reduce the risk of **flooding** from all sources
- Encourage the **effective use of land** through the reuse of land which has been previously developed
- Promote the **remediation of contaminated** sites
- Reduce the amount of **waste** created
- Maintain ambient **air quality** where it is good and improve ambient air quality where pollutants exceeds air quality objectives
- Avoid, prevent or **reduce harmful effects of air and noise pollution** on human health and the environment
- Promote **accessibility** to jobs, education, health, shopping, leisure facilities and services by public transport, walking and cycling and reduce the need to travel, especially by car
- Reduce transport based **greenhouse gas emissions**
- **Reduce energy use**, increase energy efficiency and increase renewable and low carbon energy generation
- Increase resilience to future **climate change impacts**
- Conserve and manage **heritage assets** in accordance with their significance
- Respect the **special character of all landscapes**, townscapes and streetscapes
- Protect and enhance **valued landscapes**
- Recognise the contribution that **open space**, sports and recreation make to health and well-being
- Increase opportunities to **facilitate active lifestyles**
- Avoid, prevent or reduce harmful effects of development on **human health**
- Reduce **health inequalities**
- Promote and provide opportunities for **social interaction** and **foster good relations** between communities
- Advance **equality of opportunity**, particularly for those with protected characteristics⁵
- Provide adequate community, health and social **infrastructure** to support growth and development
- **Reduce crime** and the fear of crime
- Increase **housing supply** and deliver a mix of housing to meet local housing needs
- Improve **housing quality**
- Consider the **housing needs** of different communities
- Support **sustainable economic growth** across a wide range of sectors
- Ensure vitality and viability of town and other **retail centres**
- Reduce **unemployment** and encourage higher value jobs
- Improve **education and skills**

⁵ As defined by the Equalities Act 2010

Section 4 Environmental, Social and Economic Characteristics

The SA Scoping Report 2016 and analysis of baseline data identified the following sustainability challenges and issues for area.

4.1 Environmental Characteristics

- 4.1.1 1339ha of land within the city is subject to a nature conservation designation including 1 Special Area of Conservation (SAC), 2 Sites of Special Scientific Interest (SSSI), 8 Local Nature Reserves (LNR), and 62 Sites of Nature Conservation Importance (SNCI)⁶. Monitoring suggests that there has been a long-term improvement in condition of the SSSIs, which includes the SAC, although some are still in unfavourable/recovering condition. Some of the LNRs have management plans which should help to maintain the special qualities of the sites. The Local Biodiversity Action Plan and Biosphere programme have the potential to benefit other designated sites as well as biodiversity in non-designated sites, however this depends on implementation and there is a significant pressure from development which could impact upon habitats and species unless correctly managed.
- 4.1.2 The city overlies the Brighton Chalk Aquifer, a principal aquifer and a major source of public water supply. The amount of water abstracted exceeds the rate at which the aquifer recharges and the aquifer is at risk of contamination from nitrates and pesticides and is at risk of saline intrusion. The overall status of the aquifer is currently “poor” and the south east is defined as being an area of high water stress. Groundwater Source Protection Zones cover a large area of the city. Household water consumption appears to be showing a downward trend which could be a result of universal metering, however any increase in population will result in greater stress on water resources.
- 4.1.3 The sea supports varied and mixed ecosystems and is a significant recreational asset. The quality of the seawater is currently Excellent and long term monitoring indicates that the seawater quality has improved. This is likely to be in part due to changes in sewage treatment and wastewater discharge. A Marine Conservation Zone covers an area of the sea within the city from the Marina to Saltdean.
- 4.1.4 The city covers an area of 8267ha, 40% of which lies within the SDNP. The vast majority of land that falls within the Brighton & Hove Local Planning Area is classified as non-agricultural. Much of the land within the city is defined as previously developed, e.g. is or was occupied by a permanent structure, but also includes areas of designated open spaces and Greenfield sites on the urban fringe. Monitoring over time indicates a high proportion (over 90%) of housing development has taken place on PDL.
- 4.1.5 Through the submission of planning applications and desk-top study, over 2,800 sites have been identified as having potential for contamination or being contaminated. These will require careful remediation to ensure that the groundwater resource is protected and that there are no harmful effects on other sensitive receptors, including human health.
- 4.1.6 The city is well-linked to the strategic road network, with the A23 and A27 linking the city to London as well as other areas along the south coast, as well as via the A259. The highway network experiences congestion particularly during peak hours, weekends and the summer months. Car ownership and travel to work by car is lower than the England average.
- 4.1.7 The city has rail links to London as well as the south coast. The city is also covered by a bus network, with monitoring showing an overall increase in bus passenger journeys over the long-term, however bus congestion and capacity constraints exist, particularly in key interchange areas.
- 4.1.8 The city contains 2 National Cycle routes as well as numerous local cycle routes and on-street cycles lanes, although there is not cross-city coverage. There has been much investment in cycling

⁶ SNCIs have been reviewed as part of the CPP2 process and are proposed to be re-named Local Wildlife Sites where designated.

infrastructure over the last 10 years and cycle counters indicate that the daily cycle count has increased over time.

- 4.1.9 An AQMA, designated in 2013 for exceedance of nitrogen dioxide in certain areas, exists across the city, covering areas within Brighton, Portslade and Rottingdean. The AQMA now covers a smaller area than the previous AQMA designated on 2008 however there are still many areas of the city where air quality continues to exceed the air quality objective.
- 4.1.20 In the city, carbon emissions generated by energy consumption from domestic buildings make up the greatest proportion of total carbon emissions and is higher than the England average. This is in part due to the large proportion of historic buildings and older building stock in the city. Overall, monitoring of total carbon emissions from all sources per capita shows an overall downward trend over the long term, however there is still a significant reduction to be achieved if the Climate Change Act targets are to be met, making it imperative that new buildings are highly energy efficient.
- 4.1.21 Parts of the city are at risk of flooding from tidal, groundwater and surface water flooding, with the extent increasing when climate change is taken into account. Some areas along the coast are at high probability of tidal flooding and although much of this area is protected by coastal defences, there still remains a residual risk that defences could be over-topped during a flood event. The effects of climate change means the standard of protection may reduce over time.
- 4.1.22 The city possesses a highly valued built environment and includes over 3,400 listed buildings and structures including Grade I and Grade II* buildings, 34 conservation areas, 6 Registered Parks and Gardens, and over 400 assets on the Local List. Some of the listed buildings and 1 registered park and garden are on the Historic England at risk register.
- 4.1.23 The city also includes over 80 Archaeological Notification Areas, which contain archaeological remains, and includes 16 Scheduled Monuments.
- 4.1.24 40% of the city lies within the South Downs National Park, designated in 2009 and recognised as a nationally important area with outstanding natural beauty and rich cultural heritage. The SDNP extends into the city and covers areas such as the cliffs east of the Marina, Stanmer Park, Wild Park, Hollingbury Hill and Foredown Ridge. The elevated nature of the Downs provides extensive views over areas beyond the defined National Park boundary and is therefore visually sensitive to development beyond its boundary. The SDNP is also designated as a Dark Skies Reserve and is sensitive to light pollution.
- 4.1.25 The city includes various types of designated open space, including natural/semi-natural, parks & gardens and allotments. The Open Space, Sports & Recreation Study did not identify any surplus open space and found that the city would need to retain and effectively use all existing open space, and create new areas of open space by 2026 in order to meet the needs of the predicted increase in population.

4.2 Social Characteristics

- 4.2.1 The city's population grew over 10% between the Census 2001 and 2011. The 2014 ONS population estimate for the city is 281,076. The city currently has an unusual age distribution compared to national profiles with fewer children and older residents; however the proportion of older people, including very old people is predicted to increase in the future.
- 4.2.2 Inequalities in the social determinants of health, such as education, employment, housing and income exist across the city, which results in health inequalities such as the variation in life expectancy between different areas of the city. Life opportunities can also be seriously affected for people depending on their age, disability, ethnicity, gender, religion or belief, sexual orientation, trans status or other characteristic.
- 4.2.3 Levels of deprivation vary significantly across the different areas of the city, with 17 LSOA within the top 10% most deprived LSOAs in England in 2015. Of these, 15 were also within top 10% most deprived

in 2010 suggesting that relative deprivation is not improving in some areas of the city. 21% of LSOAs are within most 20% deprived areas in England. There is greater proportion of children living in poverty in the deprived areas, which impacts on numerous health determinants, including educational attainment. Fuel poverty is also an issue in the city, with 12% of households in 2013 in fuel poverty, higher than the regional and England averages.

- 4.2.4 At the time of the Census 2011 there were 126,827 household spaces in the city, an increase of 6.6% since the 2001 Census. The 2015 Objectively Assessed Need for Housing concluded that the city would need to build 30,120 new dwellings by 2030 in order to accommodate its full need, including a significant proportion of affordable homes. The City Plan Part 1 housing target of 13,200 dwellings therefore does not meet this need in full, due to the constrained nature of the city and lack of development sites.
- 4.2.5 The cost of private rented or privately-owned housing is high in the city, particularly when compared to average local incomes, with the costs increasingly significantly over the last 15 year period. It is estimated that the city has around 6,500 Houses of Multiple Occupation (HMOs) which provide a lower-cost housing solution for many people in the city including students and young professionals.
- 4.2.6 Increasing housing supply is a key issue for the city, particularly the supply of more affordable housing and housing for those who have specialist needs and there is a need to ensure each site maximises its development potential.

4.3 Economic Characteristics

- 4.3.1 The city's economy proved relatively resilient through the recession and recorded jobs growth over the last 15 years that outperformed regional and national trends. Unemployment levels are similar to the UK average although are lower than the regional average. Average gross weekly pay for people who live in Brighton is less than the regional average but more than the UK average, due to a high proportion of low-value jobs. There is a significant gap between male and female earnings.
- 4.3.2 There are a range of different sectors providing employment opportunities, however the greatest proportion of work is involved in the wholesale and retail sectors, which is generally a lower-value industry. There is a need to diversify the local economy to support growth of high value and highly paid industries, such as those within the CDIT sector whilst recognising the contribution that lower paid service sector jobs make to the local economy, particularly for tourism.
- 4.3.3 The city's Employment Land Study Review indicating that over 112,000sqm of B1 office floorspace and 44,000sqm industrial floorspace would need to be delivered by 2030 in order to meet forecasted economic growth. There have been net losses in employment floorspace in recent monitoring periods, however longer term trends show a small overall increase. Land in employment uses is being lost to residential development through permitted development rights, which will increase the pressure on remaining floorspace. The local economy could become suppressed through lack of workspace which will have implications within the city as well as within the wider sub-region. This increases the need to provide a range of new employment floorspace in the city to help meet forecasted requirements and to unlock the delivery of identified office sites.
- 4.3.4 There is a high proportion of adults with high skills levels but a lack of highly skilled job opportunities. This leads to increased competition in lower skilled jobs, people taking jobs for which they are overqualified and excluding less skilled people out of the jobs market. There are also areas in the city suffering from high levels of education and employment deprivation and large gaps in attainment between those living in the most deprived areas compared with the rest of the city.

4.4 Likely evolution without implementation of the Plan

4.4.1 The no plan scenario is more likely to result in:

- Lower levels of housing and employment coming forward due to no sites being allocated, particularly those providing larger schemes, increasing the risk of greater housing in-affordability and a constrained local economy, although potentially resulting in less environmental impacts related to an increased population
- Greater speculative development proposals on less suitable, more sensitive sites, or higher amounts of development being proposed on sites that are only considered suitable for a small amount
- Less opportunities to increase land use efficiency
- Less purpose built student accommodation, greater reliance on HMOs and an increase in concentration of HMOS in certain areas
- Lower quality of housing being delivered
- Loss of housing to other uses
- Less affordable rented housing
- Loss of community facilities and pubs to other uses
- Un-balanced mix of uses within retail centres
- Greater risk of having to travel further to access basic services, which could impact more significantly on those who cannot travel further, including older and younger people
- Lack of new hotels coming forward, impacting on the city's ability to meet tourist needs and attract new markets
- Less consideration of the relative importance of individual heritage assets and archaeology
- Less co-ordinated approach to sustainable transport infrastructure and improvements to access
- Less protection for nature conservation designated sites, particularly sites of local importance
- No Local Green Spaces designated
- No coordinated approach to development on special areas such as Madeira Terraces and Benfield Valley
- Less consideration of the potential for adverse impacts arising from development, including air and noise pollution, light pollution and other forms of pollution and nuisance
- Lower levels of energy efficiency and greater amounts of carbon emissions resulting from domestic properties sourced from conversions or changes of use

Section 5 Characteristics of Areas Likely to be Significantly Affected

5.1 Effects arising from site allocations

- 5.1.1 The Plan allocates 7 sites for strategic mixed use allocations; 45 sites for housing and mixed uses within the built up area, predominantly on previously developed land; 14 sites for housing within the urban fringe; 2 sites for purpose built student accommodation; and one site for new business uses.
- 5.1.2 The sites are located across the city and are not particularly clumped in any one area, which should mean that there is less risk of significant cumulative effect in any one area.
- 5.1.3 The sustainability characteristics of each site and their relative sensitivity are set out in detail in Appendix F in the main SA report.
- 5.1.4 To broadly summarise, development within the built up area, including strategic mixed use sites, housing and smaller mixed use sites, PBSA and employment allocations are unlikely to have significant ecological, landscape, or water quality impacts, however there is a risk that some sites could have heritage impacts, some sites could be at risk of flooding, and some sites and are located within areas with existing air or noise issues.
- 5.1.5 To broadly summarise, development within the urban fringe could have ecological impacts, landscape impacts, and archaeological impacts and some sites are located within areas with existing noise issues or could effect air quality in that location.
- 5.1.6 Although the risk of adverse impacts remains on certain sites which have greater sensitivities as described above, higher level assessments⁷ which have ruled out development on certain sites, in particular those within the urban fringe, should mean that the sites allocated are those on which it is considered that mitigation can reduce the risk of significant adverse impact. In addition, the policy framework established in CPP1 and draft CPP2 should ensure that any potential adverse impacts are mitigated and are not significant in nature.
- 5.1.7 Due to the high amount and need for development and the constrained nature of the city, it has not been possible to only allocate sites which have no or few sensitivities. Therefore although some sites do have surrounding or on-site sensitivities, the sites that have been allocated are those where the potential for adverse impacts are not considered to be insurmountable and should be able to be overcome through mitigation measures and sensitive design.

5.2 Areas of Particular Environmental Importance

- 5.2.1 Schedule 4 (4) of the SEA Regulations requires any existing environmental problems which are relevant to the plan to be described, including in particular those designated in relation to the Birds Directive⁸ and the Habitats Directive⁹.
- 5.2.2 Castle Hill, designated as a Special Area of Conservation (SAC) is located partially within the administrative boundary of Brighton & Hove, and partially within Lewes District Council administrative area. There are no other SACs or Special Protected Areas (SPAs) within Brighton & Hove. The following table sets out those that are located within the local and wider area.

Table of designated SACs and SPAs within 20km of city boundary

Site	Approximate distance from BH	Reason for designation	Issues and problems
Castle Hill SAC	Within	Calcareous grassland	Undergrazing

⁷ Urban Fringe Assessments 2014 and 2015

⁸ EC Directive 79/409/EEC

⁹ EC Directive 92/43/EEC

	boundary	and nationally scarce species	Fertiliser Use Air pollution – atmospheric nitrogen deposition
Lewes Downs SAC	7km	Calcareous grassland and important assemblage of rare and scarce orchids	Game management: pheasant rearing Undergrazing Public access/disturbance Air pollution – atmospheric nitrogen deposition
Arun Valley SAC SPA and Ramsar site	c.19.8km	Ramshorn snail Bewick's swan Waterfowl	Inappropriate water levels Invasive species Inappropriate ditch management Water pollution
Ashdown Forest SAC and SPA	c.19.5km	Wet heathland Dry heathland Great Crested Newt European nightjar Dartford warbler	Change in land management Air pollution: atmospheric nitrogen deposition Public Access/Disturbance Hydrological changes
Pevensey Levels SCA & Ramsar site	c.20km	Ramshorn snail Wetland plants and invertebrates	Inappropriate water levels Invasive species Water pollution

5.2.3 The Habitats Regulations Assessment screening (June 2018) has screened out the likelihood of any significant effects arising from the City Plan Part Two, alone or in-combination with other plans on the followings sites:

- Castle Hill SAC
- Lewes Downs SAC
- Arun Valley SAC, SPA & Ramsar
- Pevensey Levels SAC & Ramsar

5.2.4 The screening concluded that it could not screen out the likelihood of significant effects on Ashdown Forest SAC/SPA relating to air quality/transport, although it screened out the likelihood of significant effects as a result of increased recreational pressure.

5.2.5 A full Appropriate Assessment will now be undertaken with regards to the potential for air quality impacts on Ashdown Forest and this will be considered and reported in the future SA.

Section 6 How the Assessment was Undertaken

6.1 Sustainability Appraisal Framework

6.1.1 A review was undertaken of the plans, policies and strategies that are of relevance to the Plan and for the management of development coming forward which helped to set the policy context for CPP2. The review identified the key sustainable development policy objectives, and along with the analysis of baseline information, fed into the development of sustainable appraisal objectives against which the CPP2 was assessed. This review also helped to refine the SA objectives that were developed for CPP1 that were used as a basis for the SA Framework.

6.1.2 The SA objectives for the appraisal of CPP2 are:

1. To protect, conserve and achieve a net gain in biodiversity
2. To protect and improve open space and green infrastructure and improve sustainable access to it
3. To protect, conserve and enhance the South Downs National Park and its setting, and improve sustainable access to it
4. To protect and conserve the city's historic built environment, heritage assets and their settings, townscapes, buildings and archaeological sites
5. To reduce the need to travel by car, encourage travel by sustainable forms of transport and improve travel choice
6. To improve air and noise quality
7. To improve water quality (ecological, chemical and quantity status)
8. To reduce the risk from all sources of flooding to and from development
9. To reduce emissions of greenhouse gases that cause climate change
10. To increase the city's resilience and ability to adapt to climate change
11. To improve soil quality
12. To minimise and sustainably manage waste
13. To make the best use of land available
14. To provide housing, including affordable housing, to contribute towards meeting local needs
15. To improve the range, quality and accessibility of services and facilities.
16. To improve health and well-being, and reduce inequalities in health
17. To improve community safety, and reduce crime and fear of crime
18. To increase equality and social inclusion
19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.

6.1.3 These objectives have been further developed by including decision-making criteria to define the SA objectives in greater detail and to help guide the assessment. Two sets of decision-making criteria were developed; one for appraising the options and policies of CPP2; and one for carrying out the site appraisals. The assessment against this framework helps to determine the contribution of CPP2 to achieving or supporting the various sustainable development objectives.

6.2 Methodology

6.2.1 The SA tested the draft CPP2 against the SA objectives as outlined in section 6.1. The appraisal helps to determine the likely effects arising from CPP2 and was applied to the strategic objectives set out in CPP1, the different options for developing the policies including the option of "no policy", the draft policies themselves, and the sites being allocated including some sites which were then later rejected.

6.2.2 The appraisal was done by assessing each element of the CPP2 against the appraisal objectives and making a qualitative assessment, with reference to the baseline data and local issues as identified in the Scoping Report.

6.2.3 The following symbols were used to indicate the likely nature of the effects of the options and policies:

Strong positive impact: ++

Positive impact:	+
No impact:	0
Negative impact:	-
Strong negative impacts:	--
Impact uncertain:	?
Mixed impacts:	-/+

- 6.2.4 The multiple symbols were also used to indicate significance, or where the impact of an option was substantially better or worse than others. Significance was also rated on
- the importance of the option/policy for achieving each of the appraisal objectives
 - the certainty or probability that the effect is likely to be a direct consequence of the option/policy
 - whether the effects would be permanent or not

6.2.5 The assessments also made a judgement of effects over short, medium or long term timeframes, although in general this is very difficult to predict.

6.2.6 As described under 6.1, a separate SA Framework, using the same objectives but different decision making criteria was developed for the site assessments. This awarded a score (from positive, through neutral, to negative) depending on the relative constraints and issues on site. This helped to identify the types of issues that would need to be addressed on site and was not used to discount as such due to the development pressures that exist in the city.

6.2.7 The SA has also made an assessment of the likely significant cumulative effects of the CPP2 in its entirety, which included a cumulative assessment of the Development Management policies, a cumulative assessment of the Site Allocations policies, and a cumulative assessment of all the policies together.

6.3 Difficulties encountered

6.3.1 A number of difficulties were encountered when undertaking the appraisals:

6.3.2 Data Limitations

Lack of available data or reliable data is a common problem affecting Sustainability Appraisal. Data limitations for each of the topic areas were set out in the Scoping Report. Certain datasets are out of date and in some cases there is no data available. This results in it being difficult to quantify with any certainty the likely effects of policies.

6.3.3 Uncertainty

At options stage there is a great deal of uncertainty with regards to the final contents of a policy which makes predictions and appraisals difficult. Also, at options stage, options for sites to be allocated were also unknown, making it difficult to predict whether options would have site-based impacts or not.

6.3.4 Significance

There are only few agreed sustainability thresholds over which significant impacts are considered likely. This results in it being difficult to assess the significance of any impacts with any certainty. In some cases thresholds are set by legislation, and there is adopted guidance for where there could be significant effects, for example air and water quality, which has been referred to where relevant.

Section 7 Consideration of Alternative Options

7.1 Options stage

- 7.1.2 The SA is required to assess the impacts of the City Plan Part 2 and of reasonable alternatives to it. A number of alternative options were developed and considered for each policy issue and each appraised against the SA framework to help guide the most sustainable approach.

7.2 Development Management policies

- 7.2.1 For each policy issue, the options always included the “no policy approach”. This would mean solely relying on the NPPF and any existing adopted policy and helps determine the evolution without implementation of the Plan.
- 7.2.2 In some policy areas, the only other option considered was that of developing a policy to address that particular issue. In other policy areas, several options were considered, for example tackling the issue in an SPD or other type of guidance, or tackling an issue alone or in combination with other issues.
- 7.2.3 Through the consideration of options for Development Management policies, the SA found that the option of having a policy to tackle the issue would be the preferred approach when compared with the no policy approach, as this would result in greater beneficial effects, particularly for the relevant issue being addressed. However the results differed in terms of whether issues should be addressed individually or in combination with other issues, and this is reflected in the final policies drafted in CPP2.
- 7.2.4 Following the appraisal of options, the policy was drafted informed by the SA results.

7.3 Site Allocation policies

- 7.3.1 The options stage considered whether sites for certain uses should be allocated, or should not be allocated and therefore allow the market to decide what types and where development comes forward.
- 7.3.2 The approach considered for housing and small mixed use within the built up area, and housing within the urban fringe also included consideration of the potential yield for each site. The approach considered for urban fringe allocations also included whether each site should have an individual policy, or whether one policy with a schedule of sites and specific requirements should only be considered.
- 7.3.3 Different approaches were considered for strategic mixed uses sites, including whether there should be individual policies for each site setting out the different types and amounts of development required, or whether there should be one policy covering all strategic mixed use sites with a combined total amount of development expected.
- 7.3.4 Through the consideration of options for Site Allocation policies, the SA found that the option of allocating sites would be the preferred approach in most cases as this would provide greater certainty to developers and may help to bring the different types development forward.
- 7.3.5 The SA found that allocating housing sites, including urban fringe sites, that could provide a greater yield of 10 dwellings would be the preferred approach as this allowed for greater flexibility on smaller sites, still allowing them to come forward as windfall sites, whilst providing more certainty on larger sites. The SA found that both options for urban fringe sites, including having individual policies for larger sites or where a co-ordinated approach would be required, and having one policy for all sites

would result in similar effects, and this is reflected in the Special Area policy for Benfield Valley, and the individual policy for all urban fringe allocations.

- 7.3.6 The SA found that having individual policies for strategic mixed use allocations would be the preferred approach as this would allow more specific site requirements in terms of amounts and types of development required to be set out and would also provide the opportunity to address any site specific considerations.
- 7.3.7 Following the appraisal of options, the policies were drafted informed by the SA results, which incorporated consideration of any site based impacts through the site assessments carried out for each site allocated.

Section 8 Likely Significant Effects of CPP2

8.1 How significant effects were determined

8.1.1 The SEA Regulations requires the cumulative and synergistic effects of the Plan to be considered. The SA report carried this out by firstly looking at cumulative effects of all DM policies against the SA objectives; secondly by looking at the cumulative effects of all the Site Allocation policies against the SA objectives; and thirdly by considering the cumulative effects of all the policies within the plan together against each of the SA objectives. The following sections summarise the likely cumulative effects of all the policies within CPP2 against each of the SA objectives.

8.1.2 Biodiversity

Overall, the cumulative impact of CPP2 should be **positive** for local biodiversity, particularly in the longer-term. The DM and Site Allocations policy requirements should combine to ensure that ecology and biodiversity is adequately considered and protected, that any potential adverse effects are mitigated or compensated where appropriate, and should lead to net gains overall, particularly in combination with CPP1. However, at this stage it is not possible to ascertain what the cumulative effects of transport movements and air quality on biodiversity outside the local area would be, particularly on the Ashdown Forest SAC/SPA. This will be confirmed once the full Habitats Regulations Assessment, which will assess the transport and air quality impacts arising from CPP2 alone and in combination with other plans and programmes, has taken place. Therefore, at this stage the cumulative effects on the Ashdown Forest are **uncertain**.

8.1.3 Open Space

Overall, the cumulative impact of CPP2 should be **positive** for open space, particularly in combination with CPP1. The DM and Site Allocations policy requirements should combine and result in provision of new and usable and publically accessible areas of open space.

8.1.4 SDNP

Overall, the cumulative impact of CPP2 should be **positive** for landscape, particularly in the longer-term. The DM and Site Allocations policy requirements should combine to ensure that the surrounding landscape is protected, including through good design, and that any potential adverse effects are mitigated through on-site considerations such as screening.

8.1.5 Heritage

Overall, the cumulative impact of CPP2 should be **positive** for heritage assets. The DM and Site Allocations policy requirements should combine to ensure that heritage and archaeological assets are enhanced and conserved, and should result in developments that are well-designed, that contribute towards improving the streetscape and that can be integrated into the built environment.

8.1.6 Reducing the need to travel, improving accessibility, and improving air quality

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 and seeks to reduce private car use through the delivery of infrastructure to support and encourage sustainable modes of transport, and allocates sites which predominantly have good access to most services as well as public transport provision. However the risk remains that there could be an increase in transport movements resulting from development which could **worsen** congestion and air quality.

8.1.7 Improving water quality

Overall the cumulative impact of CPP2 should be **positive** for water quality. The DM and Site Allocations policy requirements should combine to ensure that sensitive groundwater protection zones are protected, through on-site considerations and that development does not lead to the pollution of

these resources. Any increase in water consumption associated with new development is not addressed in CPP2 as this is addressed through strategic policy CPP1 CP8 Sustainable Buildings.

8.1.8 Reducing flood risk and climate change adaptation

Overall the cumulative impact of CPP2 should be **positive** for reducing flood risk and supporting climate change adaptation. The DM and Site Allocations policy requirements should combine to ensure that the risk of flooding is assessed and that appropriate measures are taken to reduce flood risk on-site as well as elsewhere, which also supports climate change adaptation, as do policy requirements that will result in protection of or increases in green infrastructure.

8.1.9 Reducing greenhouse gas emissions

Overall, the cumulative effect of CPP2 should be **positive** for minimising greenhouse gas emissions, in particular through implementation of the DM policies which build upon strategic policies contained within CPP1 and should ensure higher energy efficiency standards are achieved in conversions and changes of use. However, it is recognised that any increase in development will result in an overall net increase in carbon emissions from energy consumption.

8.1.10 Improving soil quality

Overall, the cumulative effect of CPP2 should be positive for improving soil quality as could help to remediate contaminated sites and should prevent further contamination of land.

8.1.11 Minimise Waste

Overall the cumulative effect of CPP2 policies for waste minimisation, in combination with the policies contained within WMLP, is considered to be **neutral**, as any waste arising from the demolition and construction phases should be minimised in accordance with adopted policy. Any resources saved, e.g. through the preservation of listed buildings associated with site allocations is considered to be minimal overall. It should also be noted that the potential for an overall net increase in waste production associated with new development has not been considered in this assessment, as this was considered within CPP1.

8.1.12 Making the best use of land

Overall, the cumulative effect of CPP2 should be **significantly positive** for making the best use of land in the city. The DM and Site Allocations policy requirements should combine to ensure that each site within the city has its development potential maximised, through the various requirements for types and amounts of development on each site allocated and through various policies that should ensure a balance of uses is maintained.

8.1.13 Providing housing

Overall, the cumulative effect of CPP2 should be **significantly positive** for housing. The allocation of sites for housing, including Purpose Built Student Housing, 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.

8.1.14 Improving health

Overall, the cumulative effect of CPP2 should be **significantly positive** for health and well-being. The DM and Site Allocations policy requirements combine to help deliver numerous health determinants in particular housing and employment opportunities, should help to facilitate active lifestyles and opportunities for social interaction, should help to provide a healthy urban environment, should help to facilitate access to various services and are considered to provide a framework which addresses and reduces the likelihood of site based impacts that could impact upon health, such as environmental pollution.

8.1.15 Improving community safety

Overall, the cumulative effect of CPP2 should be **positive** for community safety. The allocation of sites for mixed uses in particular can help increase passive surveillance, the allocation of sites that are currently vacant or derelict can help to increase footfall and reduce the fear of crime, and the various DM policies should contribute towards community safety in various ways such as helping to minimise vacancy in retail centres, by providing opportunities for community interaction within local areas, and by ensuring developments contribute towards improving road safety.

8.1.16 Increasing equalities and social inclusion

Overall, the cumulative effect of CPP2 should be **positive** for equalities and social inclusion. The DM and Site Allocations policy requirements should combine and are considered to be inclusive for all communities, but will particularly benefit individuals who are older, younger and disabled through various improvements to access to public realm, shops, certain heritage assets and the seafront and through the protection of certain uses within retail centres; will benefit older, disabled and people with specialist housing needs through the provision of specialist housing types; and will benefit the socio-economic deprived through opportunities for training and employment.

8.1.17 Contributing towards economic development

Overall, the cumulative effect of CPP2 should be **significantly positive** for economic development. The allocation of sites for employment uses provides a clear and direct indication that employment uses will be supported on these sites and could help to bring development forward; and the DM policies should ensure that any new floorspace delivered is flexible and can respond to future market changes, should ensure that retail centres remain attractive, vibrant and viable, and should ensure that the city remains an attractive place to visit for business or leisure purposes.

8.2 Overall Summary

8.2.1 The cumulative impacts of the DM policies are considered to be positive overall.

8.2.2 Some of the cumulative impacts of the Site Allocations policies when looked at alone are more mixed overall particularly for some of the environmental objectives. Some sites have the potential to have multiple site-based 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

8.2.3 When the DM and Site Allocation policies are considered together, the DM policies are considered to provide a policy framework which addresses and reduces the likelihood of potential adverse effects arising from development on individual sites allocated across the site allocation policies, having a combined cumulative positive or neutral effect overall. Any effects arising from CPP2 on the Ashdown Forest SAC/SPA will be considered following completion of the Habitats Regulations Assessment.

Section 9 Mitigation

9.1 Identification of mitigation measures

9.1.1 Mitigation helps to reduce the likelihood and the significance of an adverse effect. As part of the appraisals of policies, recommendations for mitigation were made whenever a policy was likely to result in an adverse impact against an SA objective and these were documented within each appraisal. In addition, the SA report summarises the different types of mitigation that would be required across all policies including cross referencing to policies contained either within CPP1 or CPP2 if they were found to mitigate impacts. The following table identifies the types of impact and how they are mitigated.

Table of Mitigation

SA Objectives	Impact	Mitigation
Biodiversity	Development could increase recreational pressure on nearby sites of nature conservation importance.	<ul style="list-style-type: none"> • CPP1 CP10 provides for protection of biodiversity. • CPP2 DM37 seeks to protect and prevent damage to designated sites. • CPP2 DM37 should ensure that development retains ecosystem services and contribute to the wider green network. • CPP1 DM37 requires development to protect protected species, habitats and trees
	Development within the seafront could impact on nearby sites of nature conservation importance.	
	Hotel development within certain Development Areas could impact upon nearby sites of nature conservation importance.	
	Maximising development on site to make the most efficient use of land could result in greater ecological losses on site.	
	Certain types of renewable energy technologies can have adverse impacts on ecology.	
	Development on some urban fringe sites could have adverse ecological impacts.	
Open Space	Development on some sites could result in loss of open space	<ul style="list-style-type: none"> • CPP1 CP16 requires some open space is retained on site if losses occur. • CP16 also requires development to provide and improve open space.
SDNP	PBSA within university campuses could have landscape impacts.	<ul style="list-style-type: none"> • CPP1 SA5 should ensure that development within the setting of the SDNP contributes towards protecting the special qualities of the landscape. • CPP1 CP15 and DM18 should ensure design is of a high quality. • CPP2 DM37 should ensure that development retains ecosystem services and contribute to the wider green network. • CPP2 SA7 and H2 require LVIA to inform
	New employment floorspace, particularly within existing industrial estates could have landscape impacts.	
	Maximising development on site to make the most efficient use of land could result in landscape impacts.	
	Certain types of renewable	

	energy technologies can have adverse impacts on landscape.	development.
	Development on some urban fringe sites could have adverse landscape impacts.	
Heritage	Possible impacts on listed buildings through conversion of C3 house into HMO.	<ul style="list-style-type: none"> • CPP2 DM27 should ensure that change of use does not harm special interest of the building. • CPP2 DM26 and DM29 should ensure that development within conservation areas or the setting of heritage assets preserve or enhance the character of the heritage asset or its setting. • CPP1 CP12 and CP13 should also ensure development conserves the city's built heritage. • CPP2 DM31 should ensure that archaeological interest is not harmed.
	Possible impacts on Conservation Areas through market development within retail areas and through development on the seafront, and through housing development on some sites.	
	Hotel development within Development Areas could impact upon adjacent heritage designations.	
	Maximising development on site to make the most efficient use of land could result in landscape impacts.	
	Certain types of renewable energy technologies can have adverse impacts on heritage.	
	Development in some locations could have adverse impacts on archaeology.	
Travel by car / transport	New employment floorspace could increase transport movements.	<ul style="list-style-type: none"> • CPP1 Spatial Strategy directs the majority of development to areas within the city which benefit from existing sustainable transport provision. • CPP1 CP9 Sustainable Transport sets the strategy relating to promoting sustainable travel. • CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised. • 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. • CPP2 DM34 requires consideration of impacts on traffic flows and city centre parking provision. • Strategic site allocation policies all require sustainable transport infrastructure improvements.
	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.	
Air/noise quality	New employment floorspace	<ul style="list-style-type: none"> • CPP1 Spatial Strategy directs the majority

	could increase transport movements and impact upon air quality.	<p>of development to areas within the city which benefit from existing sustainable transport provision.</p> <ul style="list-style-type: none"> • CPP1 CP9 Sustainable Transport sets the strategy relating to promoting sustainable travel. • CPP2 DM33 requires development to encourage travel by sustainable means and DM35 requires development to ensure journeys by car are minimised. • CPP2 DM40 should ensure that any noise impacts arising from development are acceptable. • CPP2 DM35 requires larger developments or those within the AMQA to submit a transport assessment which also considers cumulative impacts from other developments and requires development to help minimise the use of private car.
	Development within the seafront could increase attractiveness of the area and result in increased traffic and congestions and associated problems.	
	Certain types of renewable energy technologies can have adverse impacts on noise quality.	
	New housing development could increase transport movements having air quality impacts, particularly larger sites or sites within the AQMA.	
Water Quality	Conversion of C3 house into HMO could result in increases in resource consumption compared to individual dwellings	<ul style="list-style-type: none"> • CPP1 CP8 should ensure high standards of water efficiency are achieved. • CPP1 CP8 requires development to safeguard groundwater within sensitive GSPZs. • CPP2 DM42 should ensure that water quality is protected. • Some SSA policies include requirements to protect water quality.
	Development within GSPZ could have adverse impacts upon water quality	
Flood Risk	Development could be at risk of surface water flooding in certain areas, due to risk of flooding in the area or could increase the risk elsewhere.	<ul style="list-style-type: none"> • CPP1 CP11 requires development to consider previous flooding events and incorporate appropriate mitigation. • CPP2 DM43 requires development to incorporate SUDS and ensure that water run-off is not increased elsewhere. • CPP2 H2 requires development to consider various flood risks.
	Transport interchanges could result in urbanisation of land and increase risk of surface water flooding/run-off.	
Greenhouse Gas emissions	Conversion of C3 house into HMO could result in increases in resource consumption compared to individual dwellings	<ul style="list-style-type: none"> • CPP2 DM44 requires conversions and changes of use to achieve certain energy efficiency standards
Climate Change adaptation	Transport interchanges could result in urbanisation of land and increase risk of surface water flooding/run-off.	<ul style="list-style-type: none"> • CPP2 DM43 requires development to incorporate SUDS and ensure that water run-off is not increased elsewhere. • CPP2 DM37 should ensure that development retains ecosystem services and contribute to the wider green network. • H2 requires green infrastructure to be provided on urban fringe sites.
	Development on sites of a natural form could result in an increase in urbanised land, reduction in green infrastructure and increase flood risk.	

Soil Quality	Employment uses could result in an increase in contaminated land.	<ul style="list-style-type: none"> • CPP1 CP8 expects development to reduce land pollution. • CPP2 policies on polluted sites and protection of the environment should minimise this risk.
Waste	Conversion of C3 house into HMO could result in increases in resource consumption and waste compared to individual dwellings.	<ul style="list-style-type: none"> • CPP1 CP8 requires development to minimise waste and facilitate recycling. • WMLP policies should ensure that construction and demolition waste is minimised and disposed of in accordance with the waste hierarchy.
	Redevelopment on certain sites will involve demolition and production waste.	
Best use of land	Local Centre policy could result in temporary vacancies in order to prove change of use required.	<ul style="list-style-type: none"> • Vacancies would be of a temporary nature and is not considered to require mitigation. • CPP1 DA policies indicate locations where higher density development would be acceptable; CP12 Urban Design sets out the 9 areas with potential for taller developments; CP14 Housing Density provides policy guidance on expected densities.
	Protection of amenity could prevent certain types of development from being acceptable including higher density schemes.	
Access	Housing development on some of the urban fringe sites does not have good access to certain services.	<ul style="list-style-type: none"> • H2 requires development to consider the need for community facilities.
Health	Maximising development on site to make the most efficient use of land could result in increased amenity impacts.	<ul style="list-style-type: none"> • CPP2 DM20 should ensure that impacts on amenity are acceptable. • CPP2 DM40 should ensure developments are designed to alleviate any existing problems. • CPP1 CP16 requires some open space is retained on site if losses occur. • CP16 also requires development to provide and improve open space. • H2 may result in improved access to the SDNP which could be used for recreation purposes.
	New development within areas of high road/rail noise could result in occupier amenity impacts.	
	Some urban fringe sites may result in loss of open space which could impact upon physical and mental health and well-being.	
Community safety	Local Centre policy could result in temporary vacancies which may increase fear of crime.	<ul style="list-style-type: none"> • Vacancies would be of a temporary nature and is not considered to require mitigation.
Economic Development	Housing development on some sites could result in loss of employment floorspace	<ul style="list-style-type: none"> • CPP2 SSA policies allocate new land for employment uses. • E1 allocates land for employment uses. • DM11 requires new employment floorspace to be flexible.

Section 10 Monitoring

10.1 Proposals for monitoring

- 10.1.1 A number of monitoring indicators for various sustainability objectives were proposed to monitor the effects of CPP1. As CPP2 builds upon and is intrinsically linked to CPP1, it is not suggested at this stage to add any additional SA monitoring indicators. The monitoring indicators therefore cover the sustainability effects of CPP1 and CPP2. Monitoring indicators will be reviewed at a later stage of plan production if required.
- 10.1.2 In addition, a separate Monitoring & Implementation Framework is being proposed which sets out proposals for monitoring a number of policies.
- 10.1.3 An Annual Monitoring Report will be produced to monitor the implementation of CPP2 which will monitor progress and effects of CPP2.

Section 11 Statement on the Difference the SA Process has made

11.1 Summary

- 11.1.1 The SA has been integral to the plan preparation process and has carried out an iterative assessment where policies have been refined.
- 11.1.2 The SA of options for Development Management policies helped to identify the most sustainable approach and helped to steer direction of the final draft policy.
- 11.1.3 The SA of options for allocating housing on sites within the built up area and on the urban fringe contributed to identifying which of the sites to allocate, and the site assessment work helped to identify the possible site constraints.
- 11.1.4 The site assessment work helped to identify site constraints on strategic mixed use sites, which led to recommendations for changes to policy text in some cases.
- 11.1.4 The SA of the final draft policies made recommendations for some changes to policies, which helped to either reduce the likelihood of adverse effect, or helped strengthen any potential positive outcomes. In total, the SA resulted in changes to 19 policies.

