

Brighton & Hove City Plan Part 1
Sustainability Appraisal/Strategic Environmental Assessment
Post Adoption Statement, March 2016
Regulation 16 of The Environmental Assessment of Plans and Programmes
Regulations 2004

1 Introduction

- 1.1 Brighton & Hove City Council adopted the City Plan Part 1 on 24th March 2016. This followed the Examination in Public in October 2013, and three rounds of modifications in 2014 and 2015 that the Planning Inspector directed the city council to make in order to ensure the City Plan was sound. The Planning Inspector's Report confirming the City Plan was sound, subject to modifications, was received on 5th February 2016.
- 1.2 In preparing the City Plan Part 1, the Council undertook a parallel process of Strategic Environmental Assessment and Sustainability Appraisal. Strategic Environmental Assessment (SEA) is required by European Directive EC/2001/42 (SEA Directive) and is focused on the environmental implications of implementing plans and policies. It was transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004 ('SEA Regulations'). Sustainability Appraisal (SA) is required by the Planning and Compulsory Purchase Act (2004) in order to ensure that sustainability considerations are integrated into the plan making process. As with SEA, SA is concerned with the environmental impacts of implementing development plans, but it also carries a wider remit that includes social and economic considerations.
- 1.3 Good practice guidance (National Planning Practice Guidance) advises that the requirements for both SEA and SA can be met through a single appraisal process. The Council has applied this approach in appraising the Brighton & Hove City Plan Part 1. Therefore, throughout the remainder of this statement, reference to Sustainability Appraisal implies both SA and SEA.
- 1.4 This Sustainability Appraisal Post Adoption Statement has been prepared in accordance with Regulation 16 (4) of the SEA Regulations. It describes how environmental considerations have been integrated into the plan, how the environmental report has been taken into account, how consultation responses have been taken into account, and summarises the reasons the plan was chosen, in light of other reasonable alternatives considered. The statement also sets out the measures that will be used to monitor the effects of the City Plan Part 1.
- 1.5 As the SA and SEA process have been integrated throughout the preparation of the plan process, this statement addresses not only environmental aspects but also the wider sustainability (social and economic) aspects.
- 1.6 The remainder of this statement is set out by headings which reflect the requirements of the SEA Directive and Regulations.

2 How environmental and wider considerations have been integrated into the plan

- 2.1 The Brighton & Hove City Plan sets out the city's planning framework up to 2030. It provides the overall strategic and spatial vision for the future and plays an important role in ensuring other citywide plans and strategies achieve their objectives. The City Plan identifies the broad locations, scale and type of development and supporting infrastructure that will take place in the city. It sets clear policies that will guide decisions on planning applications.
- 2.2 The City Plan has undergone various stages of preparation, and builds upon some of the stages that were prepared under the withdrawn Core Strategy. These stages are described in more detail in section 3. At each stage, the City Plan objectives, options and/or policies have been appraised against the Sustainability Appraisal Framework which has ensured environmental, economic and social considerations have been integrated into the plan.
- 2.3 The first stage of the Sustainability Appraisal process was the production of the [Core Strategy Scoping Report \(2005\)](#) at plan pre-production stage. Within this report, information on relevant plans, strategies and programmes, as well as baseline data covering social, economic and environmental issues was collated in order to identify key sustainability issues for the city. These issues were used to inform development of a series of sustainability appraisal objectives that formed the SA Framework against which the emerging plan was assessed. The SA Framework was initially set out in the Scoping Report and then was revised following consultation comments. The amended SA Framework was then applied throughout the subsequent preparation stages.
- 2.4 The Sustainability Appraisal Objectives included environmental, social and economic objectives, ensuring a broad scope for sustainability considerations. The SA Objectives are listed as follows:
1. To prevent harm to and achieve a net gain in biodiversity under conservation management as a result of development and improve understanding of local, urban biodiversity by local people.
 2. To improve air quality by continuing to work on the statutory review and assessment process and reducing pollution levels by means of transport and land use planning.
 3. To maintain local distinctiveness and preserve, enhance, restore and manage the city's historic landscapes, townscapes, parks, buildings and archaeological sites and their settings effectively.
 4. To protect, conserve and enhance the South Downs and promote sustainable forms of economic and social development and provide better sustainable access.
 5. To meet the essential need for decent housing, particularly affordable housing.

6. To reduce the amount of private car journeys and encourage more sustainable modes of transport via land use and urban development strategies that promote compact, mixed-use, car-free and higher-density development.
7. Minimise the risk of pollution to water resources in all development.
8. Minimise water use in all development and promote the sustainable use of water for the benefit of people, wildlife and the environment.
9. To promote the sustainable development of land affected by contamination.
10. Manage coastal defences to protect the coastline and minimise coastal erosion and coastal flooding.
11. To balance the need for employment creation in the tourism sector and improvement of the quality of the leisure and business visitor experience with those of local residents, businesses and their shared interest in the environment.
12. To support initiatives that combine economic development with environment protection, particularly those involving targeted assistance to the creative & digital industries, financial services, tourism, retail, leisure and hospitality sectors.
13. To improve the health of all communities in Brighton & Hove, particularly focusing on reducing the gap between those with the poorest health and the rest of the city.
14. To integrate health and community safety considerations into city urban planning and design processes, programmes and projects.
15. To narrow the gap between the most deprived areas and the rest of the city so that no one should be seriously disadvantaged by where they live.
16. To engage local communities into the planning process.
17. To make the best use of previously developed land.
18. To maximise sustainable energy use and mitigate the adverse effects of climate change through low/zero carbon development and maximise the use of renewable energy technologies in both new development and existing buildings.
19. To ensure all developments have taken into account the changing climate and are adaptable and robust to extreme weather events.
20. To encourage new developments to meet the high level Code for Sustainable Homes/BREEAM 'Excellent' standard.¹
21. To promote and improve integrated transport links and accessibility to health services, education, jobs, and food stores.
22. To reduce waste generation, and increase material efficiency and reuse of discarded material by supporting and encouraging development, businesses and initiatives that promote these and other sustainability issues.

2.5 The SA Framework has been used as a basis to appraise the City Plan through its various iterations. It has appraised the strategic objectives, options and policies and has enabled the identification of positive, negative and cumulative effects. The appraisals, using the SA Framework as a tool, have ensured the integration of sustainability considerations into the City Plan.

¹ The Code for Sustainable Homes was withdrawn in 2015. Sustainability Appraisal work carried out after this date did not include an assessment against this part of the SA objective.

3 How the Sustainability Appraisal/Environmental Report has been taken into account

3.1 Production of the City Plan has been carried out as an iterative process, with the plan's strategic options and options for policies being subject to a comparative assessment and policies being further refined at various stages.

3.2 The following table shows the various stages of the City Plan and former Core Strategy that have been undertaken. At each stage, there has been an equivalent stage of sustainability appraisal. At each stage, where appropriate, the City Plan was developed and modified to take into consideration the Sustainability Appraisal findings.

Table 1 to show stages of plan making and associated stage of SA

Date	Plan-making stage	SA stage
October 2005	Core Strategy Issues & Options	SA Scoping Report
November 2006	Core Strategy Preferred Options	Preferred Options SA Report
June 2008	Core Strategy Revised Preferred Options	Revised Preferred Options SA Report
June 2009	Core Strategy Proposed Amendments Paper	Proposed Amendments Paper SA
February 2010	Core Strategy Proposed Submission	Proposed Submission SA
October 2011	City Plan Policy Options Paper	Policy Options Paper SA
May 2012	Draft City Plan	Draft City Plan SA
Feb 2013	Submission City Plan	Submission City Plan SA
Oct 2014	City Plan Proposed Modifications	Proposed Modifications SA Addendum
July 2015	City Plan Further Modifications	Further Modifications SA Addendum
September 2015	City Plan Further Modifications CP8	Further Modifications to CP8 SA Addendum

3.3 A [report](#) documenting the SA process and the changes that resulted from the SA was produced as a technical topic paper that formed part of the Submission documents. This report provides full details of all the individual recommendations made at each stage up to and including Submission stage, February 2013. The report shows how the recommendations were taken into account.

3.4 The following paragraphs briefly summarise how the SA findings were taken into account. The summary is set out by plan preparation stage.

Issues & Options

- 3.5 At this stage the SA Scoping Report was produced. The Scoping Report helped to identify the social, economic and environmental issues that needed to be addressed in the Core Strategy and helped to identify which other plans and programmes had a bearing on the Core Strategy. These issues fed into the Core Strategy Issues and Options document.
- 3.6 The SA Scoping Report also included an assessment of the Strategic Objectives, however although potential conflicts were identified, no change to the objectives took place, as the Strategic Objectives were considered to provide mitigation against the potential conflicts.

Preferred Options

- 3.7 At this stage the SA re-assessed the revised spatial objectives, and assessed the four options for growth: accessibility, regeneration, urban character, limited urban fringe expansion; options for the seven policy themes, such as housing; and options for the six cross-theme policy topics, such as the seafront. The SA process resulted in the following:
- The combination of two of the options for growth to form the preferred spatial strategy: accessibility and urban character approaches, helping to identify areas to direct significant development
 - Development of new options to cover various policy themes
 - Amendments/clarifications to text of various options for policy themes
 - Pursuing/confirming the most sustainable option for the policy themes and cross-theme policy topics

Revised Preferred Options

- 3.8 At this stage, the potential for Shoreham Harbour for accommodating significant development was re-considered in light of proposals put forward by SEEDA. In addition, the Spatial Strategy Urban Fringe Growth Option was re-considered in light of the modifications to the proposed South Downs National Park boundary. In addition, the SA undertook full appraisals of the various options put forward for the Development Area policies, the Special Area policies and the Core policies. The SA process resulted in the following:
- Re-confirming the preferred approach for growth in light of changing circumstances
 - Additional text added to various preferred options
 - Pursuing/confirming the most sustainable option for the policies

Proposed Amendments

- 3.9 At this stage, the SA assessed 8 policies which had undergone significant changes since the previous stage. The SA also assessed 5 new options for development at Shoreham Harbour. The SA process resulted in the following:
- Amendments to text of two policies

- Identification of the preferred option for Shoreham Harbour

Submission Core Strategy

3.10 At this stage, the SA assessed the strategic objectives, the Development Area policies, Special Area policies and Core policies. In addition, the SA assessed three new options for Shoreham Harbour. The SA process resulted in the following:

- Amendments to text of 12 policies

City Plan - Policy Options Paper

3.11 At this stage, the SA assessed options for four policy areas: scale and location of housing, economic development, student housing, and park & ride. The SA process resulted in the following:

- Identification of the most sustainable option for each of the policy areas
- Identification of mitigation to be considered at future policy development stages

Draft City Plan

3.12 At this stage, the SA assessed Strategic Objectives, the Development Area policies, Special Area policies and Citywide policies. The SA process resulted in the following:

- Amendments to text of 12 policies
- Incorporation of some indicators into City Plan monitoring framework

Submission City Plan

3.12 At this stage, the SA re-assessed the Strategic Objectives, and re-assessed the final draft policies which were considered to have changed significantly from the previous stage which included all of the Development Area policies, 4 of the Special Area policies and 7 of the Citywide policies. This stage also included the assessment of two options for a new policy "SS1- The Presumption in Favour of Sustainable Development". The SA process resulted in the following:

- Additional text added to policy SS1
- Confirmation of the most sustainable option for policy SS1
- Amendments to text for policy DA7

Proposed Modifications

3.13 At this stage, the SA assessed two options for the spatial strategy, two options for the housing target and re-assessed 18 policies which were found to have changed significantly since the Submission version due to Proposed Modifications. The SA was taken into consideration as follows:

- Confirmation of most sustainable option for the Spatial Strategy
- Confirmation of most sustainable option for housing delivery target
- Amendments to text of policies DA2 and CP18

Further Modifications

3.14 At this stage, the SA re-assessed four policies which were found to have changed significantly either since the last version, which was at either Submission stage or Proposed Modifications stage. No recommendations for further changes were put forward at this stage due to the nature of the modifications which arose from national policy changes.

Further Modifications to CP8 (Sustainable Buildings)

3.15 At this stage, the SA re-assessed policy CP8. Two versions of the policy were assessed with the SA recommendations being incorporated into the final version to improve policy performance. The SA was taken into account as follows:

- Amendments to policy text

3.16 To summarise, SA has been fully integrated into the process of plan production. The SA has highlighted key issues and made certain they have been taken into account. It has enabled a comparative assessment of options to be undertaken, helping to identify the most sustainable option, has made recommendations to enhance policies, has suggested mitigation and set out measures to monitor potential impacts.

4 How the results of any consultations have been taken into account

4.1 As shown in Table 1, there have been many stages of plan preparation, each of which has undergone widespread public and stakeholder consultation. Consultation always included the main planning document, the Sustainability Appraisal report and any other supporting documents relevant to each stage.

4.2 Consultation was always in accordance with the relevant Town & Country Planning Regulations and the council's adopted [Statement of Community Involvement 2015](#). Specifically, in accordance with Regulation 13 of the SEA Regulations, consultation always included the three statutory environmental bodies; Natural England, Environment Agency and Historic England.

4.3 Following each stage of consultation, a Consultation Statement was produced detailing what consultation was undertaken, where and with whom, and providing details of all representations received. Consultation Statements for all stages can be found on the [Core Documents List](#) on the City Plan Examination page on the council's website. In all stages of plan production prior to examination stage, an officer response was provided showing how the representations were taken into account. Following the examination, the

consultation statements did not include an officer response, as at these later stages representations were for consideration by the Planning Inspector.

- 4.4 In addition to the Consultation Statements, each SA report prior to the examination has included details of the representations received at the previous stage that were specific to the SA. This also included a response to show how the comments were taken into account. The brief summaries set out below indicate how some of the representations were taken into account, set out by the stage of plan preparation.

Issues & Options stage (Scoping Report)

4.5 The sections were amended as follows:

- Additional Plans, Programmes and Strategies included.
- Additional baseline data included.
- Additional sustainability issues included.
- Sustainability Appraisal Objectives revised.

Preferred Options stage

4.6 The sections were amended as follows:

- Sustainability Appraisal Objectives revised.
- Additional indicators included within baseline data.
- Sustainability issues section updated and revised.
- Additional Plans, Programmes and Strategies included.
- References to relevant plans, programmes and strategies updated.
- References to particular issues included within policy appraisals
- Maps updated.

Revised Preferred Options stage

4.7 The sections were amended as follows:

- Sustainability issues section updated and revised
- Additional indicators included within baseline data / monitoring table
- Incorporation of assessments relating to carbon emissions
- Production of separate Non-Technical Summaries
- Additional Plans, Programmes and Strategies included
- Greater consideration of various issues within the policy appraisals
- Removal of “subjective” comments
- Updated targets added

Proposed Amendments stage

4.8 The sections were amended as follows:

- Sustainability Issues section updated and revised
- Additional Plans, Programmes and Strategies included.

- Baseline data updated and additional indicators added
- Comments utilised and added during various policy appraisals
- Amendment to methodology to clarify when a “mixed” +/- score is appropriate, with revised assessments showing “worst-case scenario”
- Re-appraisal of some policies to ensure consistent approach
- Summary of recommendations put forward by SA provided in a table

Policy Options Paper stage

4.9 The sections were amended as follows:

- Additional Plans, Programmes and Strategies included
- Sustainability issues section updated and revised
- Summary appraisal tables revised to improve clarity for readers
- Amendment of some of the baseline indicators / monitoring indicators
- Baseline data updated in part
- Future appraisals to refer to the potential for adverse impacts from tall buildings within central areas on the South Downs National Park
- Commitment to review Sustainability Appraisal Objectives at City Plan Part 2
- Clarification of errors within policy appraisals

Draft City Plan stage

4.10 No comments were received at this stage which resulted in any action

Submission City Plan and subsequent modifications

4.11 Various representations on the SA were received at the Submission City Plan, Proposed Modifications, Further Modifications, and Further Modifications to CP8 stages. As representations submitted at these stages were for the consideration of the Planning Inspector undertaking the Examination of the City Plan, these comments were summarised and sent to the Planning Inspector and did not necessarily lead to any changes in subsequent SA reports or in carrying out the SA.

4.12 All comments were also made publically available in the relevant Consultation Statements.

5 The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with

- 5.1 As already described, the Brighton & Hove City Plan was prepared in an iterative way with the SA, as well as other evidence and background studies informing plan production at each stage. At various stages of plan production there was ongoing scrutiny of reasonable alternatives, for both the spatial strategy and other policies. This was to ensure the assessment was placed within the current context, and is of particular importance when the planning framework and local situation changes over time. The adopted plan reflects the most sustainable approach to future development in the city that is in accordance with national policy requirements, when compared to other alternatives.

Spatial Strategy

- 5.2 A number of spatial growth options were initially identified for the city, which were assessed against the sustainability appraisal framework at various stages including at Preferred Options and Revised Preferred Options stages. The Core Strategy and the Submission version of the City Plan incorporated a spatial strategy based on a combined accessibility-led and urban character-led approach to growth, which was considered to be the most sustainable approach at that time. At Proposed Modification stage of the City Plan, the SA tested the existing approach to the Spatial Strategy against an alternative approach. This built on the existing accessibility/urban character approach but also allowed for some residential development on the urban fringe. The new approach was found to be the more sustainable option when placed in the current context and it is this approach to growth on which the adopted Plan is based.

Policies

- 5.3 The assessments of the options for growth assisted in the identification of the development areas to which the majority of development is located. Each Development Area policy was also assessed against an alternative option at Revised Preferred Options stage to ensure the approach to development within the policy was the most sustainable option. Some had further options assessed at subsequent stages where relevant.
- 5.4 A number of supporting policy options were subject to assessment against the sustainability appraisal framework at various stages including Preferred Options and Revised Preferred Options of the Core Strategy, and at Policy Options and Proposed Modifications stages of the City Plan. Results of these assessments were used to inform emerging and preferred policy approaches. As the preferred policy approaches progressed throughout the plan production stages, they were refined as appropriate, taking into account

emerging and revised national policy, consultation feedback, any new technical evidence and the sustainability appraisal findings.

- 5.5 At Proposed Modifications stage, a table was produced that set out the selection and rejection of alternatives (Appendix F). This shows the various options that have been identified over time, and summarises the SA reasons for selection or rejection of that option or policy approach. This table was updated as appropriate at Further Modifications stages.

Conclusions of the Sustainability Appraisal

- 5.6 Overall, the City Plan is considered to reflect the most sustainable approach within the current policy context, providing a balance between social, economic and environmental needs. Although implementation of the Plan may result in some adverse impacts, these impacts would also arise without the Plan being implemented and would potentially be more significant, however without the Plan, less of the beneficial gains would be realised.

Some of the more significant impacts of the City Plan are considered to be:

5.7 Positive impacts:

- An increase in housing, including some affordable housing albeit at a level below the city's objectively assessed and affordable housing need, highlighting the ongoing need for discussions under the Duty to Co-operate.
- An increase in the amount of land for employment uses, having economic benefits.
- Overall improvements in the design and quality of new development.
- Improvements in access to services, through both increased provision and improvements in transport infrastructure
- Delivery of many of the wider determinants of health, including housing and employment opportunities, although it is recognised that some existing social issues associated with under-supply of housing are likely to continue

5.8 Adverse impacts:

- Increase in traffic congestion and associated impacts including air quality and carbon emissions, with this likely to be more problematic in central areas and in the morning peak time.
- Increase in pressure between competing land uses, resulting in increased loss in greenfield sites, some of which perform an open space function, and associated impacts such as visual impacts and other environmental impacts associated with the services these ecosystems provide, such as adapting to climate change.
- Increased consumption of water and the impact of this on the Brighton Chalk Aquifer.
- Increased consumption of energy, potentially compromising the city's ability to meet local targets relating to reducing the ecological footprint and

national targets relating to reducing carbon emissions, as set by the Climate Change Act.

- Increased pressure on local amenities, particularly open space which will become more significant as the population increases.

6 The measures that are to be taken to monitor the effects of the implementation of the plan

- 6.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require that local authorities *“monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.”*
- 6.2 The City Plan includes a monitoring framework which identifies a clear method for managing and monitoring implementation of the Plan. This framework is set out in Annex 1 Implementation and Monitoring of the City Plan. For each policy, the implementation and monitoring plan sets out the issue to be addressed, an indicator, target and timescale, and triggers and actions to show what will be done if targets are not achieved. The indicators developed for each policy are to ensure that key issues are addressed and more broadly will enable progress in plan delivery to be evaluated. The Monitoring & Implementation Plan includes several indicators that were put forward by the Sustainability Appraisal at draft City Plan stage.
- 6.3 At each stage the SA has set out the proposed indicators that will be used to monitor progress against each of the 22 sustainability objectives within the SA Framework. This will ensure that monitoring also includes wider sustainability achievements across a range of issues that may not necessarily be covered by the policy specific indicators within the Implementation and Monitoring Plan. It is recognised that some of these SA indicators may not be influenced directly by the City Plan but will be useful in providing an overall picture of how the city is evolving. Monitoring against some of the SA indicators also helps to provide baseline data for the next SA.
- 6.4 The SA indicators have been refined over time and may need to be revised in future should monitoring requirements change. The full set of SA monitoring indicators is set out in the following table.

Table 2 to show monitoring against the SA Framework

SA Objective	Indicator
1) To prevent harm to and achieve a net gain in biodiversity	Number and area of designated sites (SAC, SSSI, SNCI, LNR, AONB, RIGS).
	Percentage of area of SSSI land in (a) favourable condition (b) unfavourable recovering condition (c) unfavourable no change condition (d) unfavourable declining condition (e) area part destroyed / destroyed
	SQM of habitat or biodiversity features added or lost (citywide) as a result of development
2) To improve air quality	The area of the city in km ² where the annual mean for nitrogen dioxide (calendar year) exceeds the national legal limit of >40 µg/m ³ (monitored and modelled NO ₂).
	Improvement in levels of air quality in London Road, Lewes Road and Rottingdean areas.
3) To maintain local distinctiveness	Number and % of Listed Buildings that are Grade 1 and 2* (a) on at risk register (b) subject to demolition
	Amount of open space created or lost (citywide) as a result of development
4) To protect, conserve and enhance the South Downs	Number of bus services that operate to the South Downs from Brighton & Hove
	Amount of land under: 1) Entry level 2) High level environmental stewardship schemes
5) To meet the essential need for decent housing	Net additional housing completions
	Gross affordable housing completions
	House price to income ratio
	% of households considered to be suffering from over-crowding (having one less bedroom than required)
6) To reduce the amount of private car journeys	Car ownership per household
	Annual average daily traffic flow: (a) Outer cordon sites: 5, 22, 608 and 620 (b) City centre cordon sites: 74, 800, 809, 813
	Annual average daily cycle flow: (a) National Cycle Route 2 sites: 951, 967

SA Objective	Indicator
	(b) National Cycle Route 90 sites: 960, 961
	Percentage of development where parking is provided for bicycles.
	Percentage of residential units delivered that are car-free
	CO2 emissions per capita from road transport (kt)
7) Minimise the risk of pollution to water resources	Status of the groundwater resource as measured by the requirements of the Water Framework Directive.
	Quality of bathing water
	Percentage of new development incorporating SUDS within the development or beyond the development area.
8) Minimise water use in all development	Domestic consumption of water (litre of water per day per household)
	Percentage of new residential development achieving the water efficiency standard of 110litres/person/day.
9) Promote the sustainable development of land affected by contamination	Number of sites of previously developed land that have been identified as having potential for contamination under Part 2A of the Environment Protection Act.
10) Manage coastal defences and minimise coastal erosion and flooding	Number of developments in a flood risk area granted contrary to the advice of the Environment Agency
11) To balance the need for employment creation	Amount (£) of developer contributions secured for training for local residents, through the Local Employment Scheme
	Number and percentage of in-commuters compared to out-commuters
12) To support initiatives that combine economic development with environment protection	Level of GVA per head
	Proportion of VAT registered businesses per 10,000 population
	Percentage population that are in employment
13) To improve the health of all communities	Life expectancy at birth (males, females - years)
	Obesity among primary school in year 6 (percentage)
	Adults achieving more than 150 minutes physical activity a week
	Percentage of population living in 20% most deprived Super Output Areas (health domain)
14) To integrate health	Number of total police recorded crimes.

SA Objective	Indicator
and safety considerations	People killed or seriously injured in road traffic accidents
15) To narrow the gap between the most deprived areas and the rest of the city	Percentage of population living in the 20% most deprived super output areas in the country
	Percentage of population over 60 who live in households that are income deprived
	Tackling fuel poverty - Percentage of people living in fuel poverty
	Percentage of young people who are not in employment, education or training (NEET);
	Percentage of non-decent council homes
16) To engage local communities in the planning process	Number of adopted DPDs or SPDs that have incorporated periods of public consultation
17) To make the best use of previously developed land	Percentage of new and converted dwellings on Previously Developed Land
	Percentage of new employment land on Previously Developed Land
	Percentage of development situated on Greenfield land.
18) To maximise sustainable energy use	Kt of CO2 per capita emitted from domestic sources for energy provision
	Average annual domestic consumption of gas and electricity
	Average annual commercial and industrial consumption of gas and electricity
	% of new residential development achieving the 19% carbon reduction improvement over Part L as required by CP8
	% of development with low/zero carbon energy proposed
19) To ensure developments have taken into account the changing climate	Percentage of new development incorporating green infrastructure such as green walls/roofs.
20) To encourage new non-residential developments to meet BREEAM standards	% of new non-residential development meeting the minimum standards as required by BH.
21) To promote and improve integrated transport links and accessibility	Percentage of development that is within 500 m of the following: Doctors, accessible open space, bus stop/rail station, infant junior or primary school, retail provision.

SA Objective	Indicator
22) To reduce waste generation	Residual household waste per household
	Percentage of household waste: (a) recycled (b) composted (c) used to recover heat, power, and other energy sources
	Percentage of development providing facilities for recycling.

6.5 Progress against the Implementation and Monitoring Plan and the SA Framework will be published annually in the Authorities Monitoring Report as required by planning legislation.

Rob Fraser
Acting Head of City Planning
Brighton & Hove City Council
Kings House
Hove, BN3 2LS