

Brighton & Hove Submission City Plan Part One

Proposed Modifications

October 2014

Health & Equalities Impact Assessment (HEQIA) Addendum



Brighton & Hove
City Council

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1. Background

- 1.1 Brighton & Hove City Council began the preparation of the City Plan Part 1 Development Plan Document (DPD) in October 2011. This followed on from work to progress its Core Strategy that commenced in 2005. In May 2012, the draft City Plan Part 1 was published and was subject to widespread community and stakeholder consultation.
- 1.2 During this time, a combined Health & Equalities Impact Assessment (HEQIA) was carried out on the policies contained in the draft City Plan Part 1 to fulfil the requirements relating to Health Impact Assessment and Equalities Impact Assessment. The assessment helped to identify potential health outcomes, both adverse and beneficial and their distribution amongst sensitive community groups.
- 1.3 The HEQIA made a number of recommendations on how to improve the policies to ensure beneficial health impacts were maximised and to reduce or avoid adverse impacts on sensitive communities, where identified. The majority of these recommendations were incorporated into revised policies.
- 1.4 As a result of stakeholder consultation, a number of policies were amended between draft City Plan and submission City Plan stages. An HEQIA Addendum was produced in February 2013 which looked at the key policy changes and the potential for impacts on the determinants of health and sensitive communities. The Addendum also provided the opportunity to assess the potential impacts of the newly incorporated model policy SS1 The Presumption in Favour of Sustainable Development.
- 1.5 The HEQIA Addendum 2013 made no further recommendations for policy changes and concluded that overall the changes strengthened the policies and had beneficial outcomes for health and equalities.
- 1.6 Brighton & Hove City Council submitted the City Plan Part 1 in June 2013. The Examination in Public on the Submission City Plan Part 1 was held in October 2013. Since the Examination, a number of proposed modifications have been put forward in order for the City Plan to be found sound. This report assesses whether the proposed modifications result in any health or equalities impacts.
- 1.7 It is anticipated that the City Plan Part 1, as modified, will be re-examined in 2015 following consultation on the proposed modifications.

2. Purpose of this report

- 2.1 The purpose of this Addendum report is to assess whether there are any health and equalities implications arising from the proposed modifications. Modifications have arisen from:
- the representations received during consultation on the soundness of the Plan in April 2013 (Regulation 19 consultation);
 - the Statements of Common Ground that were agreed between the council and stakeholders prior to the Examination in Public;
 - discussions that took place with stakeholders during the Examination in Public process; and
 - correspondence with the Inspector during and following the Examination in Public.
- 2.2 This report is in addition to the HEQIA 2012, and the HEQIA Addendum 2013 and should be read in conjunction with and alongside those reports.

3. Screening Proposed Modifications

- 3.1 A total of 116 proposed modifications have been put forward to make the City Plan Part 1 sound. A screening exercise of all the proposed modifications has been undertaken, the results of which can be found in Appendix A – Development Area policies; Appendix B – Special Area policies and Appendix C – Citywide policies.
- 3.2 The aim of the screening process is to identify modifications which are considered to make a difference to the previous HEQIA findings of the City Plan.
- 3.3 In summary, the screening process has identified three main types of effects:
- no impact on any of the determinants of health or sensitive communities, e.g. modification is of an editorial nature or for clarification/information purposes.
 - a minor positive or negative effect on one or more of the determinants of health or sensitive communities, but does not change the previous HEQIA findings.
 - a major positive or negative effect on one or more of the determinants of health or sensitive communities, that results in a change to the previous HEQIA findings.

4. Summary of modifications resulting in a change to previous HEQIA

4.1 The screening process has identified 9 policies (including the Spatial Strategy) for which the previous HEQIA assessment findings have changed against one or more of the determinants of health or sensitive communities. The following table provides a summary of the anticipated impact of the specific modifications, arranged by policy order. The actual wording of these modifications can be found in Appendix D.

In addition, an assessment was carried out on the revised Spatial Strategy, as an assessment of this has not previously taken place. The results of this can be found in Appendix E.

Table 1. Summary of anticipated changed impacts

Policy	Modification reference and description	HEQIA Implications	Main direction of change
Spatial Strategy	PM010 The Strategy still maximises opportunities for brownfield development but includes the urban fringe being identified as a broad source of potential for housing. Housing target increased.	The increased housing target impacts positively on the housing and employment determinants of health. The need to release land on the urban fringe may impact adversely on lifestyle and environment and could impact on socio-economic deprived communities through reduction in open space used for recreational purposes. Other impacts as described in the assessment. (see Appendix E)	Mixed.
DA3 Lewes Road	PM029 & PM030 Requirement for the Woollards Field and Falmer Released Land Strategic Allocations to ensure protection of groundwater sources.	This requirement has positive implications for the Environment determinant at operational stage, and should ensure protection of groundwater.	Positive impacts
	PM032 Confirmation that part of the Woollards Field site is earmarked for an ambulance/paramedic rapid response station.	This requirement has positive implications for the Health Needs determinant and should help to meet emergency health needs.	Positive impacts
DA7 Toads Hole Valley	PM045 Amendment of requirement from "to enhance links to the	These changes result in requirements that are less strong than the previous	Mixed and uncertain impacts

Policy	Modification reference and description	HEQIA Implications	Main direction of change
	<p>National Park” to “to seek to enhance links to the National Park”.</p> <p>Amendment of requirement from “make provision for improved pedestrian and cycle links to the South Downs National Park” to “make contributions towards improved pedestrian and cycle links to the South Downs National Park”.</p> <p>Amendment of requirement from “provide improved links to existing parks and food-growing space (0.5 ha.) and opportunities” to “provide contributions towards improved links to existing parks and food-growing space (0.5 ha.) and opportunities.”</p>	<p>policy position. The changes also create some uncertainty around whether links to the SDNP and existing parks will actually be provided and creates some uncertainty on the Transport and Access/Accessibility determinants of health.</p> <p>This may impact on the sensitive community as highlighted in the HEQIA 2012: children/young people walking to the site for education/recreation purposes from other areas.</p>	
SA4 Urban Fringe	<p>PM064</p> <p>New policy text which indicates that the Urban Fringe Assessment 2014 will be a material consideration in the determination of planning applications that come forward prior to Part 2 of the City Plan. Revised supporting text referring to the Urban Fringe Assessment 2014, the process for allocations through the SHLAA, and a commitment for the council to maximise housing opportunities to meet local needs, such as through community land trusts, community-led development and so on.</p>	<p>This change has positive implications for demography, as will impact upon the population in this location. The change impacts positively on the housing determinant. It impacts adversely on the transport determinant. This results in mixed impacts on the Access determinant. This results in mixed impacts on the lifestyle determinant. This results in adverse impacts on the environment determinant. The change may impact on sensitive communities: those facing socio-economic deprivation in adjacent communities due to the possible reduction in sites for recreation and leisure purposes and the impacts of this on health.</p>	Some positive; some negative.

Policy	Modification reference and description	HEQIA Implications	Main direction of change
CP1 Housing Delivery	PM072 Increased housing target to 13,200 homes, of which 1,060 to be located on the urban fringe. Confirmation of status of the Urban Fringe Assessment, and the process for allocating urban fringe sites through Part 2 of the City Plan.	The change strengthens the positive impact for the housing determinant. The change may positively impact on transport as development on the urban fringe could now directly influence transport infrastructure in this location. The policy could adversely affect lifestyle of existing communities who make use of the urban fringe open space sites for recreation/leisure purposes. The policy indirectly impacts upon access, as urban fringe development could increase provision of services in this location, although could result in a lack of access if the additional services required to meet every day needs are not provided.	Some positive; some negative.
CP3 Employment Land	PM075 and PM076 New text clarifying that waste management uses would be considered acceptable in an industrial estate location.	This change may have negative implications for the Environment determinant of health, as waste management facilities could result in odour, noise and air emissions, dependent on the type of waste facility.	Negative
CP16 Open Space	PM099 & PM101 New policy text confirming that the Urban Fringe Assessment will be a material consideration in the determination of planning applications prior to City Plan Part 2 Site Allocations stage. Supporting text confirms that the Urban Fringe Assessment identified some areas of open space as having potential for housing.	The changes impact positively on demography in the urban fringe location. The changes impact positively on the housing determinant of health. The changes are considered to bring about mixed impacts on lifestyle, as could result in reduced access to open space, impacting on recreation and health. The changes are considered to have adverse and uncertain impacts on environment.	Some positive; some negative.

Policy	Modification reference and description	HEQIA Implications	Main direction of change
		The amendments could impact on adjacent sensitive communities suffering from socio-economic deprivation where health issues related to inactivity are most prevalent, due to the potential for reduced access to open space for recreation purposes. Research shows that close access to open space benefits the health of everyone, but benefits the health of the least well off the most	
CP17 Sports and Recreation	PM102 New policy text confirming the Urban Fringe Assessment will be a material consideration in the determination of planning applications prior to Part 2 Site Allocations stage.	This impacts positively on housing determinant of health. The limited extent of the loss of outdoor space has negligible impacts on other health/equalities determinants.	Positive.
CP19 Housing Mix	PM106 New criteria added committing Part 2 of the City Plan to introduce dwelling space standards.	This requirement has positive implications for the Housing determinant of health as should ensure dwellings are built to certain space standards.	Positive.

5. Mitigation and Recommendations

5.1 Some of the proposed main modifications were found to have potential for adverse or less positive impacts than previous assessments. The following mitigation is therefore recommended:

5.2 Spatial Strategy, SA4, CP1, CP16

- Ensure environmental impacts of development are mitigated to an acceptable level.
- Ensure HIA (or similar) scopes in the potential for impacts on the health and deprivation of sensitive communities adjacent to development in an urban fringe location, particularly resulting from reduced access to open space for recreation/leisure purposes.
- Improve access to remaining sites within the urban fringe, or SDNP.
- Ensure development schemes within the urban fringe incorporate open space where possible.
- Ensure ancillary services to meet local needs are provided within urban fringe developments.
- To incorporate sustainable transport measures to encourage sustainable travel.
- Ensure appropriate parking for new communities in the urban fringe location to reduce any adverse impacts on adjacent neighbourhoods.

5.3 DA7

- To ensure that HIA scopes in assessment of impacts on safety of children/young people accessing the site from other areas, or leaving the site, particularly for education/recreation purposes.

5.4 CP3

- Regulatory procedures should ensure that any potential environmental nuisance from waste sites is minimised to a permitted level.

5.5 Recommendation

The following changes were recommended, in relation to the potential for adverse impacts on sensitive communities, particularly those adjacent to urban fringe sites:

5.6 DA7

Add following sentence to paragraph 3.94 of supporting text:

HIA should pay regard to the impacts on sensitive communities as identified in the HEQIA, particularly children and young people, in relation to road safety and accessing the site for educational/recreational purposes.

This recommendation was not carried forward into DA7 for the following reasons:

- Policy CP18 Healthy City already requires HIA on strategic developments. The supporting text of this policy includes a specific requirement to take specific note of any health or equalities issues as identified by the HEQIA or updates.
- Policy CP9 Sustainable Transport includes policy criteria on road safety, as well as school travel plans.

This point is therefore considered to be adequately covered by existing policy.

5.7 CP18

Policy point 3. Require larger developments to demonstrate how they minimise adverse impacts and maximise positive impacts on health within the development or in adjoining areas (where the benefits of new development can be maximised)

This recommendation was carried forward into the policy, as Proposed Modification103.

6. Conclusion

- 6.1 The majority of the proposed modifications have no further impact from that already identified in the HEQIA 2012 or Addendum 2013.
- 6.2 Where the impact is considered to be different to that previously identified, some of these strengthen the potential for positive impacts against a range of health determinants.
- 6.3 There are some changes which are considered to result in a more adverse impact. Where a more negative or uncertain change has been predicted, it is considered that the requirements of policy CP18 A Healthy City, as amended by the HEQIA recommendation put forward, which either requires a Health Impact Assessment to be carried out on all strategic developments, or that requires larger developments to demonstrate how they will minimise adverse and maximise positive impacts on health, should ensure that any adverse health impacts are minimised and positive health impacts are maximised.
- 6.4 This HEQIA Addendum comes to the same conclusion of the HEQIA 2012 in that the City Plan Part 1 presents policies that are coordinated to achieve positive health and well-being outcomes throughout Brighton & Hove and where adverse impacts are anticipated, there are measures in place in order to minimise them.

Appendix A: Screening of Proposed Modifications – Spatial Strategy & Development Area Policies

The following table summarises the proposed modifications for each Development Area policy and outlines the potential for impacts on determinants of health and sensitive communities.

Policy / Key Changes	Conclusion
Spatial Strategy	
<p>Main changes include: Increase to the housing target of 13,200 new homes; reference that the majority of new development will be located on brownfield (previously developed sites) within the city's built up area; reference to the new Objectively Assessed Need for housing of a range of 18,000-24,000 and the inclusion of the urban fringe as a broad source of potential for housing development.</p>	<p>Full re-assessment has taken place as previously not covered in the HEQIA. See Appendix E. The increased housing target impacts positively on the housing and employment determinants of health. The need to release land on the urban fringe may impact adversely on lifestyle and environment and could impact on socio-economic deprived communities. Other impacts as described in the assessment.</p>
DA1 Brighton Centre & Churchill Square	
<p>Policy changes include: Addition of word "net" to amount of retail floorspace to be delivered; requirement to improve bus interchange at Churchill Square; requirement to improve cyclist and pedestrian access particularly along Queens Road in addition to the surrounding area; amended enlarged area where air quality improvements should be sought, and for development to take account of impact on air quality. Changes to supporting text include: Information that supplements policy changes.</p>	<p>The additional references to the improvements of sustainable transport and access strengthen the potential for positive impacts against the Transport and Access & Accessibility determinants of health. The requirement for development to consider air quality impacts and provide mitigation and improvements strengthens the potential for positive impacts against the Environment determinant of health. It is recognised that air quality in this part of the city is some of the worst recorded citywide, with the first HEQIA identifying that some communities are particularly sensitive to poor air quality and that this should be scoped into a project level HIA. No other impacts on sensitive communities or determinants of health are anticipated from the other amendments.</p>
DA2 Brighton Marina, Gas Works & Black Rock	
<p>Policy changes include: removal of restriction of development to be below cliff height; change in emphasis relating to requirement to provide sustainable heat and power production: now encouraged to consider and not required to provide; wording that allows viability and deliverability to be taken into account when assessing development proposals relating</p>	<p>The change relating to removal of District Centre status, could result in a mix of uses that do not meet the day to day needs of the future population, e.g. banks, post-offices and so on, which is likely to become more acute in the long-term as the local population increases. This could adversely impact on the Services, amenities and leisure determinant of health. However, it is</p>

Policy / Key Changes	Conclusion
<p>to sustainable energy production; slight reduction in amount of residential units (-2) and clarification on units per strategic allocation; some changes in wording: employment B1a and B1c replaced by business, community replaced by leisure; removal of District Centre status and all associated wording; clarification that amount of retail floorspace is a net amount; requirement for new leisure facility to complement the Marina.</p>	<p>recognised that the policy now commits to the development of a specific policy in Part 2 that will address this and ensure an appropriate mix comes forward, and so the impact is considered to remain positive in the long term.</p> <p>No other impacts on sensitive communities or determinants of health are anticipated from the other amendments.</p>
<p>DA3 Lewes Road</p>	
<p>Policy changes include: New emphasis on reducing the impact of traffic on air and noise quality and for development to take account of impact on air quality; increase in number of residential units to be delivered; removal of requirement for Preston Barracks Strategic Allocation to be zero carbon; new requirement for the Woollards Field and Falmer Released Land Strategic Allocations to ensure protection of groundwater; removal of requirement for development at Woollards Field to meet outstanding BREEAM; removal of requirement for Falmer Released Land to achieve zero carbon status.</p> <p>Changes to supporting text include: Information that supplements policy changes; text to confirm the Woollards Field site is earmarked for rapid response ambulance/paramedic infrastructure.</p>	<p>The emphasis on reducing traffic impacts strengthens the potential for positive impacts against the Environment determinant of health, although as recognised in the first HEQIA, the potential for an increase in traffic still remains. The additional residential units to be delivered strengthens the positive impacts against the Housing determinant. The requirement relating to groundwater protection has positive implications for the Environment determinant at operational stage.</p> <p>Supporting text which confirms that health-based infrastructure will be provided at Woollards Field has positive impacts on the Health Needs determinant.</p> <p>No other impacts on sensitive communities or determinants of health are anticipated from the other amendments.</p>
<p>DA4 New England Quarter</p>	
<p>Policy changes include: Requirement for noise quality impacts to be addressed through sustainable transport and for development to take account of impact on air quality; reduction in residential units to be delivered (-55).</p> <p>Supporting text changes include: information to supplement policy changes.</p>	<p>The emphasis on sustainable transport and reducing the impacts of traffic strengthens the positive impacts against the Transport and Environment determinant. The reduction in residential units to be delivered is not considered to have an adverse impact on the Housing determinant as a significant amount of housing will still be delivered.</p> <p>No other impacts on sensitive communities or determinants of health are anticipated from the other amendments.</p>

Policy / Key Changes	Conclusion
DA5 Eastern Road and Edward Street	
<p>Policy changes include: Amended reference to water and waste-water treatment; additional reference supporting improvements to higher education teaching and library space within the area; corrections and amendments to wording around air quality; increase in the amount of residential units to be delivered (+45); changes to the Freshfield Road and Gala Bingo site Strategic Allocation reflecting that employment re-development is only likely to come forward in the long term, with the residential part of the scheme coming forward earlier in the plan period.</p> <p>Supporting text changes include: information to supplement policy changes.</p>	<p>The text relating to improvement of higher education facilities strengthens the positive impact against the Education determinant of health.</p> <p>The increase in residential units to be delivered strengthens the positive impact against the Housing determinant of health.</p> <p>The other amendments are not considered to impact on any of the determinants of health, nor on any of the sensitive communities.</p>
DA6 Hove Station	
<p>Policy changes include: Reduction in amount of residential units to be delivered (-95).</p> <p>Supporting text changes include: Updates to text detailing AQMA; requirement for new development to take into account impact on air quality and seek to deliver improvements where possible.</p>	<p>The reduction in the amount of residential units to be delivered is not considered to impact adversely upon the housing determinant of health, as a significant amount of units should still be delivered. The additional wording around air quality strengthens the positive impact against the Environment determinant of health.</p> <p>No other impacts on sensitive communities or determinants of health are anticipated from the other amendments.</p>
DA7 Toads Hole Valley	
<p>Changes to policy include: reduction in strength of requirement from “being” an exemplar sustainable development to “aiming to be” an exemplar sustainable development; amended wording requirement development to “seek to” enhance links to the SDNP; amended wording relating to the types of opportunities that may be provided for local residents; amended wording relating to requirements around surface water flood risk; requirement to provide employment floorspace removed and replaced by requirement to allocate a site area; requirement to reserve a site for a school rather than provide a school; removal of</p>	<p>The change in wording relating to seeking the enhancement of links to the SDNP is not as strong as the previous position and makes the impact more uncertain on the Transport and Access determinants of health. Similarly, the change in wording relating to contributing towards improving pedestrian and cyclists links and contributing towards links to parks is not as strong as the previous position, and also results in more uncertainty against the Transport and Access determinants of health.</p> <p>The removal of the requirements to physically provide employment floorspace and a secondary school alongside the</p>

Policy / Key Changes	Conclusion
<p>requirement to provide energy infrastructure, with it now being an “aim”; removal of specific requirements to meet certain BREEAM standards and replaced with requirement to meet CP8; requirement to provide improved pedestrian and cyclist links replaced by contributions towards improvements; word “minimum” from size of children’s play space removed.</p> <p>Supporting text changes include: information to supplement policy changes.</p>	<p>residential element of the scheme, replaced by the requirement to provide a site for these facilities reduces the strength of the positive impact against the Employment and Education determinants, however the aim for these to be provided in the area still remains, and therefore the impact is still considered to be positive.</p> <p>No other impacts on determinants of health or sensitive communities are anticipated from the other amendments.</p>
<p>DA8 Shoreham Harbour</p>	
<p>Changes to policy include: change in boundary of Development Area: reduction in amount of housing; Boundary Road/Station Road removed; addition of priority to maximise opportunities for sustainable energy production; wording to clarify the JAPP will address a range of issues, including infrastructure provision; commitment added to designate Aldrington Basin as a Strategic Employment/Mixed-Use Area; change in wording for i) Aldrington Basin and ii) North Quayside South Portslade relating to securing improvements to permeability and connectivity, and ensuring the local character is respected and enhanced; additional text to ensure development takes air quality into account.</p> <p>Changes to supporting text include: Editorial changes relating to the South East Plan; minor amendments to wording relating to wharves and minerals.</p>	<p>The change in wording relating to improving permeability strengthens the positive impacts against the Transport determinant, also linking to Lifestyle.</p> <p>The requirements relating to air quality strengthens the positive impacts against the Environment determinant.</p> <p>No other impacts on determinants of health or sensitive communities are anticipated from the other amendments.</p>

Appendix B: Screening of Proposed Modifications - Special Area Policies

The following table summarises the proposed modifications for each Special Area policy and outlines the potential for impacts on determinants of health and sensitive communities

Policy / Key Changes	Conclusion
SA1 The Seafront	
<p>Changes to policy include: amendment of residential units to be provided now expressed as a minimum.</p> <p>Changes to supporting text: updated text that clarifies much of the A259 is within the Air Quality Management Area 2013; reference to the Marine Management Organisation and the preparation of a Marine Plan; updated text referring to the revision of the Brighton Marina to River Adur Strategy.</p>	<p>None of the amendments are considered to impact on any of the determinants of health, nor on any sensitive communities.</p>
SA2 Central Brighton	
<p>Changes to policy include: additional text to ensure development takes impacts on air quality into account; additional commitment for the council to work with public transport providers and freight operators, to help reduce transport emissions.</p> <p>Changes to supporting text: Updates to supporting text reflecting policy changes around air quality.</p>	<p>The requirements relating to air quality strengthen the positive impacts against the Environment determinant of health.</p> <p>The amendments are not considered to impact on any sensitive communities.</p>
SA3 Valley Gardens	
<p>No major changes to the policy took place at Proposed Modifications stage.</p>	<p>No changes.</p>
SA4 Urban Fringe	
<p>Changes to policy include: text to clarify urban fringe meets NPPF definition of open space; text confirming that there will be opportunities for development within the urban fringe to meet citywide needs; new paragraph confirming the status of the Urban Fringe Assessment, in that it will be a material consideration should applications come forward prior to City Plan Part 2.</p> <p>Change to supporting text: providing more information on the Urban Fringe Assessment and confirming that sites will be assessed through the SHLAA and</p>	<p>The changes impact positively on demography, as the policy will now directly influence population numbers in this location. In particular, housing in this location could provide much needed family type housing, and the new population could be more reflective of this.</p> <p>The changes impact positively on the housing determinant of health.</p> <p>The changes could impact adversely against the transport determinant of health, due to the combined effects of increased visitation and increased local population in the area.</p> <p>The changes are considered to strengthen</p>

Policy / Key Changes	Conclusion
<p>allocated in Part 2 of the City Plan. New text committing the council to maximise housing opportunities that meet local needs, e.g. through community land trusts, housing co-operatives.</p>	<p>the positive impact on access and accessibility, through potential for improved access, but could also reduce access to open space within the urban fringe, and could also result in lack of accessibility to services for new communities, having adverse impacts.</p> <p>The changes are considered to bring about mixed impacts on lifestyle, as could result in reduce access to open space, impacting on recreation and health.</p> <p>The changes are considered to have adverse and uncertain impacts on environment.</p> <p>The amendments could impact on adjacent sensitive communities suffering from socio-economic deprivation where health issues related to inactivity are most prevalent, due to the potential for reduced access to open space for recreation purposes. Research shows that close access to open space benefits the health of everyone, but benefits the health of the least well off the most.</p>
SA5 The Setting of the South Downs National Park	
<p>Change to policy title reflecting the fact that the policy only applies to the setting of the SDNP.</p> <p>Changes to policy text: deletion of much of the policy text, with it being moved to the supporting text section.</p> <p>Other changes reflect that the SDNPA is the planning authority for the South Downs National Park.</p>	<p>The amendments are not considered to impact on any of the determinants of health nor on any sensitive communities.</p>
SA6 Sustainable Neighbourhoods	
<p>No changes to policy text.</p> <p>Changes to supporting text: additional aim requiring residential development to provide for a mix of dwelling types and tenures and meets minimum size standards.</p>	<p>The amendment strengthens the positive impact against the Housing determinant of health.</p> <p>No impacts on any of the sensitive communities are anticipated.</p>

Appendix C: Screening of Proposed Modifications - Citywide Policies

The following table summarises the proposed modifications for each Citywide policy and outlines the potential for impacts on determinants of health and sensitive communities.

Policy / Key changes	Conclusion
<p>CP1 Housing Delivery</p> <p>Changes to policy include: Change in housing target to 13,200; change to table which shows distribution of housing across the city amended to reflect changes within individual Development Areas as well as a new allowance of 1,060 units of housing from within the urban fringe.</p> <p>Changes to supporting text include: updated figures for the city’s objectively assessed need – re-assessed as a range of between 18,000 to 24,000; further information about the housing potential from urban fringe sites; confirmation that sites will be taken forward for further consideration through the SHLAA process and as site allocations in Part 2. Confirmation that the Urban Fringe Assessment will be a material consideration prior to this.</p>	<p>The increase in housing to be delivered strengthens the positive impact against the Housing determinant of health.</p> <p>Development on some urban fringe sites may have some influence over transport infrastructure, as the sites may be currently inaccessible. Development in this location may result in additional transport infrastructure which impacts positively against the Transport determinant of health.</p> <p>The policy may now have some influence over lifestyle, as urban fringe sites form part of the open space resource used for formal and informal exercise. Development in this location may therefore reduce opportunity for formal/informal exercise for existing adjacent communities and could have an adverse impact on Lifestyle. This will depend on the location and current use of the sites developed.</p> <p>In relation to health inequalities, research indicates that all communities benefit from close access to open greenspace, but that those facing deprivation benefit the most. The policy may therefore adversely impact upon existing communities adjacent to urban fringe sites suffering from socio-economic deprivation. This will depend on the location, levels of socio-economic deprivation and current use of the sites developed.</p> <p>Development in the urban fringe location could also impact positively against the Access and Accessibility determinant of health, provided it was accompanied by the required services.</p>
<p>CP2 Sustainable Economic Development</p>	
<p>Changes to policy include: additional priority which recognises the importance of</p>	<p>The amendment is considered to strengthen the potential for positive health outcomes on</p>

Policy / Key changes	Conclusion
<p>employment-generating non B-Class uses.</p> <p>Changes to supporting text: to reflect additional priority in policy text.</p>	<p>the Income and Employment determinant of health.</p> <p>The amendments are not considered to impact on any sensitive communities.</p>
CP3 Employment Land	
<p>Changes to policy include: New reference to waste management facilities being acceptable on an industrial estate location; new text which allows loss of employment floorspace on mixed use sites if it can be justified; amendment to priority 5 providing further clarification of when loss of unallocated sites will be permitted.</p> <p>Changes to supporting text: amendment reflecting completion of the employment trajectory and the need to monitor against it; additional wording relating to accommodating waste management facilities on industrial estates; additional text to clarify that educational teaching space and health facilities are considered to be employment generating uses despite not being within B1-B8 class use; viability added to list of criteria when loss of employment will allowed.</p>	<p>The amendments are considered to strengthen the potential for positive health outcomes on the Income and Employment determinant of health.</p> <p>The ability to site waste management facilities on industrial estates may impact adversely on the Environment determinant of health, through potential for odour, noise or air emissions, however it is presumed that regulatory authorities would ensure that these are within the permitted guidelines. In addition, certain waste uses would not be associated with this type of nuisance.</p> <p>The amendments are not considered to impact on any sensitive communities.</p>
CP4 Retail Provision	
<p>Changes to policy include: clarification that impact assessment threshold is a net figure; removal of District Centre status from Brighton Marina.</p>	<p>The change relating to removal of District Centre status at the Marina, could result in a lack of uses required to meet the day to day needs of the future population, e.g. banks, post-offices and so on, which is likely to become more acute in the long-term as the local population increases in the Marina area. This could adversely impact on the Services, amenities and leisure determinant of health. However, it is recognised that policy DA2 now commits to the development of a specific policy in Part 2 that will address this and ensure an appropriate mix comes forward, and so the impact is considered to remain positive in the long term.</p> <p>No other impacts on sensitive communities or determinants of health are anticipated from the other amendments.</p>

CP5 Culture & Tourism	
No changes to this policy took place at Main Modifications stage.	No changes.
CP6 Visitor Accommodation	
Minor changes to supporting text.	The amendments are not considered to impact on any of the determinants of health nor on any sensitive communities.
CP7 Infrastructure and Developer Contributions	
Changes to supporting text: new requirement to ensure developers liaise with utility providers and ensure timely connection to utilities, including water, wastewater and sewerage.	The amendments are not considered to impact on any of the determinants of health nor on any sensitive communities.
CP8 Sustainable Buildings	
Changes to policy include: change in standards required to be achieved by residential development across all timescale to bring them into accordance with building regulations. Additional requirement for development to reduce land pollution and to safeguard water if within a groundwater source protection zone. Changes to supporting text: change to footnote reference to Waste & Minerals Local Plan and identified need for additional waste recycling and recovery capacity.	Although this amendment may impact upon the cost of running a home, this is not considered to significantly impact upon any of the determinants of health. In addition, it may help housing to be more viable, be brought forward more readily, having positive impacts for the housing determinants of health. The amendments are considered to strengthen the potential for positive impacts on the Environment determinant of health. The amendments are not considered to impact on any sensitive communities.
CP9 Sustainable Transport	
Changes to policy include: additional requirement for major development to implement agreed travel plans; inclusion of Valley Gardens as a priority route on the bus network; Queens Road and West Street added to list of areas where public realm improvements are prioritised.	The changes strengthen the potential for positive impacts against the Transport, Access, Lifestyle and Environment determinants. Improvements to the public realm should impact positively on individuals who use wheelchairs.
CP10 Biodiversity	
Editorial changes only.	No changes.
CP11 Flood Risk	
Change to supporting text reflecting the Council's role as Lead Local Flood Authority with a responsibility for surface and groundwater flooding and other responsibilities arising from the Flood and Water Management Act.	The amendments strengthen the potential for positive impact on the Environment determinant of health. The amendments are not considered to impact on any sensitive communities.

CP12 Urban Design	
Editorial changes only	No changes.
CP13 Public Streets and Spaces	
No changes at proposed modifications stage.	No changes.
CP14 Housing Density	
Editorial changes only	No changes
CP15 Heritage	
No changes at proposed modifications stage	No changes.
CP16 Open Space	
<p>Changes to policy to confirm status of Urban Fringe Assessment, in that it will be a material consideration in the determination of planning applications prior to City Plan Part 2.</p> <p>Change to Supporting Text which confirms that the Urban Fringe Assessment has identified some open spaces as having some potential for housing delivery; text which states that close proximity to the SDNP compensates for the some of the loss. Change to additional open space requirements associated with a housing target of 13,200 to 167ha.</p> <p>Other changes to policy include: editorial changes relating to the policies map; deletion of wording relating to maintenance plans from priority 2d and replaced in priority 2f.</p>	<p>The changes impact positively on demography, as the policy will now directly influence population numbers in the urban fringe location.</p> <p>The changes impact positively on the housing determinant of health.</p> <p>The changes are considered to bring about mixed impacts on lifestyle, as could result in reduced access to open space, impacting on recreation and health.</p> <p>The changes are considered to have adverse and uncertain impacts on environment.</p> <p>The amendments could impact on adjacent sensitive communities suffering from socio-economic deprivation where health issues related to inactivity are most prevalent, due to the potential for reduced access to open space for recreation purposes. Research shows that close access to open space benefits the health of everyone, but benefits the health of the least well off the most.</p>
CP17 Sports Provision	
Changes to policy to confirm status of Urban Fringe Assessment, in that it will be a material consideration in the determination of planning applications prior to City Plan Part 2.	It is understood that the Urban Fringe Assessment has only identified one outdoor sports site which has potential for residential development, and this site is currently unused. Therefore, this change is not considered to impact adversely on any of the determinants of health, and impacts positively on the housing determinant.
CP18 Healthy City	
Changes to supporting text: New footnote explaining Lifetime Neighbourhood principles; new paragraph requiring development proposals to protect and improve air quality.	<p>The amendments strengthen the potential for positive impact against the Environment determinant of health.</p> <p>The amendments are not considered to impact on any sensitive communities. (NB. It is noted that the recommended change put forward by the HEQI A process was included and this helps to reduce the</p>

	potential for adverse impacts on the health of the sensitive communities identified).
CP19 Housing Mix	
Changes to policy text: new criteria added committing Part 2 of the City Plan to introduce dwelling space standards. Changes to supporting text: reflecting new requirement in main policy re: dwelling space standards.	The amendments impact positively on the Housing determinant of health.
CP20 Affordable Housing	
No changes at proposed modifications stage.	No changes.
CP21 Student Housing & HMOs	
Editorial updates to the supporting text.	No changes.
CP22 Traveller Accommodation	
Editorial updates to footnote.	No changes.

Appendix D – List of Proposed Modifications resulting in change to HEQIA

NB: only sections of the main modification of relevance to this HEQIA Assessment included. For all modifications see Proposed Modifications Schedule.

Reference	Policy	Modification
PM010	Spatial Strategy	<u>2.20 Much of the land within the city’s defined urban fringe forms part of the city’s green infrastructure; either in terms of the city’s open space framework (e.g. parks, recreation grounds, sports pitches and playing fields, allotments, cemeteries, natural/semi-natural space) or part of the city’s biodiversity resource such as local nature reserves, sites of conservation importance or Nature Improvement Areas. However in light of the significant scale of the city’s housing need, objectively assessed to fall within a range of 18,000 – 24,000 new homes to 2030¹; the requirement of the government’s National Planning Policy Framework to plan positively to meet housing needs in full and the need to adequately address the social dimension of sustainable development the potential for housing from the urban fringe has had to be reassessed². The strategy for accommodating growth in the city continues to maximise development opportunities from brownfield sites but also includes the urban fringe as broad source of potential for housing development.</u>
PM029 and PM030	DA3 Lewes Road, Pages 50 - 51	At DA3.C.2 Woollards Field Add new criterion: <u>g) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u> At DA3.C.3 Falmer Released Land, Former High School Add new criterion: <u>f) The development must ensure that groundwater sources are protected to the satisfaction of the Environment Agency.</u>
PM032	DA3, 3.37, supporting text page 54	3.37 Planning permission was granted in 2011 for an archive centre with related conference, education and research facilities on the Woollards Field site to the south of Falmer Station. The remainder of the site to the south is allocated for <u>5,000 square metres of office business (B1) floorspace</u> or other employment generating uses in connection with meeting the city’s infrastructure needs totalling 5,000 square metres. <u>The</u>

¹ Coastal West Sussex Housing Study Update 2014

² Urban Fringe Study June 2014

		<p><u>site is earmarked in the Infrastructure Delivery Plan (Annex 2) as providing important infrastructure to meet the city's requirement for ambulance/paramedic rapid response points.</u></p>
PM045	DA7 Toad's Hole Valley, policy and supporting text amendments, pp 79-86	<p>DA7 – Toad's Hole Valley</p> <p>The strategy for the development of Toad's Hole Valley and Court Farm is to secure a modern, high quality and sustainable mixed use development to help meet the future needs of the city, improve accessibility and provide new community facilities to share with adjacent neighbourhoods.</p> <p>A. The local priorities to achieve this strategy are:</p> <p>3. Ensure that development respects the setting of the South Downs National Park and <u>seeks to enhance links to the National Park for local residents and tourists.</u></p> <p>C. The strategic allocation for Toad's Hole Valley is:</p> <p>1. Toad's Hole Valley east of the SNCI and south of the A27 embankment</p> <p>The following criteria will form the framework for detailed planning guidance and the basis for considering development proposals <u>The proposals will be assessed against the citywide policies and the following criteria:</u></p> <p>h) Development will make <u>contributions towards</u> provision for improved pedestrian and cycle links to the South Downs National Park.</p> <p>m) Provision of children's play facilities, public open space (2 ha. minimum), <u>contributions towards</u> improved links to existing parks and food-growing space (0.5 ha.) and opportunities.</p> <p><u>Supporting Text:</u> 3.97 Improved walking and cycling links to the South Downs National Park will be expected to be provided as part of the redevelopment scheme. This may involve improving existing links or providing new links to the Park.</p>
PM064	SA4 The Urban Fringe policy and supporting text amendments.	<p>SA4 Urban Fringe</p> <p><u>Where appropriate, the</u> The council will promote and support the careful use and management of land within the urban fringe to achieve the following objectives:</p>

1. The protection and enhancement of the wider landscape role of land within the urban fringe, the setting of the South Downs National Park and the protection of strategic views into and out of the city.

2. Securing better management of the urban fringe, environmental improvements and safe public access to the countryside through sustainable means.

3. The promotion of the urban fringe land as part of the city's green network and, where appropriate, encouraging opportunities for multi-functional uses such as, appropriate recreation and cultural experience, new allotments and local food production and biodiversity conservation and enhancements (see CP10 Biodiversity).

4. The protection of sensitive groundwater source protection zones from pollution and encouraging land management practices that reduce rapid surface water runoff and soil erosion.

5. The creation of 'gateway' facilities and interpretative facilities in connection with the South Downs National Park to support sustainable tourism.

Development within the urban fringe will not be permitted except where:

- a) a site has been allocated for development in a development plan document; or
- b) a countryside location can be justified;

and where it can be clearly demonstrated that:

- c) the proposal has had regard to the downland landscape setting of the city;
- d) any all-adverse impacts of development are minimised and appropriately mitigated and/or compensated for; and
- e) where appropriate, the proposal helps to achieve the policy objectives set out above.

Should proposals for development come forward prior to the adoption of Part 2 of the City Plan, the 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development within the urban fringe.

Supporting Text

Some land within the city's urban fringe has been identified as having potential to help meet the city's housing requirements (see Part B, policy CP1 Housing Delivery). Sites identified through the 2014 Urban Fringe Assessment Study (or parts of sites where relevant) will be considered to have potential for

		<p><u>housing in the Strategic Housing Land Availability Assessment exercise. Further consideration and a more detailed assessment of potential housing sites will be undertaken to inform allocations made in Part 2 of the City Plan with a particular emphasis on delivering housing to meet local needs. As part of this process, the City Council will consider how best to ensure opportunities for community land trusts, community-led development, right to build, and housing co-operatives are brought forward/safeguarded in order to maximise housing opportunities that meet local housing needs. This will be taken forward through the City Plan Part 2. Sites coming forward for development ahead of the preparation of Part 2 of the City Plan will need to address criteria c to e set out in Policy SA4 above and satisfy detailed information requirements³ at the planning application stage.</u></p>																																		
PM072	CP1 Housing Delivery	<p>The council will make provision for at least 11,300 <u>13,200</u> new homes to be built over the plan period 2010 – 2030 (this equates to an annual average rate of provision of 565 <u>660</u> dwellings).</p> <table border="1"> <thead> <tr> <th>Area / Source of Supply</th> <th>No. of new homes</th> </tr> </thead> <tbody> <tr> <td>Development Area</td> <td></td> </tr> <tr> <td>DA1 – Brighton Centre and Churchill Square Area</td> <td>20</td> </tr> <tr> <td>DA2 – Brighton Marina, Gas Works and Black Rock Area</td> <td>1940</td> </tr> <tr> <td>DA3 – Lewes Road Area</td> <td>810 875</td> </tr> <tr> <td>DA4 – New England Quarter and London Road Area</td> <td>1185 1130</td> </tr> <tr> <td>DA5 – Eastern Road and Edward Street Area</td> <td>470 515</td> </tr> <tr> <td>DA6 – Hove Station Area</td> <td>630 525</td> </tr> <tr> <td>DA7 –Toad’s Hole Valley</td> <td>700</td> </tr> <tr> <td>DA8 – Shoreham Harbour</td> <td>400 300</td> </tr> <tr> <td>Development Area Total</td> <td>6155 6005</td> </tr> <tr> <td>Development Across Rest of City:</td> <td>3945</td> </tr> <tr> <td> a) <u>Within the built up area</u></td> <td><u>4130</u></td> </tr> <tr> <td> b) <u>Within the urban fringe</u></td> <td><u>1060</u></td> </tr> <tr> <td></td> <td></td> </tr> <tr> <td>Small identified sites</td> <td>650 765</td> </tr> <tr> <td>Small Windfall Development</td> <td>600¹²⁵ 1250¹²⁵</td> </tr> </tbody> </table>	Area / Source of Supply	No. of new homes	Development Area		DA1 – Brighton Centre and Churchill Square Area	20	DA2 – Brighton Marina, Gas Works and Black Rock Area	1940	DA3 – Lewes Road Area	810 875	DA4 – New England Quarter and London Road Area	1185 1130	DA5 – Eastern Road and Edward Street Area	470 515	DA6 – Hove Station Area	630 525	DA7 –Toad’s Hole Valley	700	DA8 – Shoreham Harbour	400 300	Development Area Total	6155 6005	Development Across Rest of City:	3945	a) <u>Within the built up area</u>	<u>4130</u>	b) <u>Within the urban fringe</u>	<u>1060</u>			Small identified sites	650 765	Small Windfall Development	600 ¹²⁵ 1250 ¹²⁵
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³ This may include, for example, landscape assessment, ecology surveys, traffic assessments and possibly Environmental Impact Assessment.

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		<p>4.13 <u>Part B of Policy CP1 also indicates that some sites within the city's wider urban fringe will contribute to housing land supply. Sites will be taken forward for further consideration and detailed assessment as site allocations through Part 2 of the City Plan. The 2014 Urban Fringe Assessment Study will be a material consideration in the determination of any applications for residential development on urban fringe sites that come forward prior to the adoption of Part 2 of the City Plan (see policy SA4 Urban Fringe).</u></p>		
PM075	CP3 Employment Land, pages 138-139 and insert new footnote	<p>Amend CP3:</p> <p><u>Sui generis uses, including waste management facilities, appropriate in nature to an industrial estate location will also be acceptable, provided that they generate employment which is quantitatively and qualitatively comparable to uses within B1-B2 B8 Use Classes¹⁵²; do not harm the continuation of existing uses within those Classes and comply with other City Plan policies and for waste management facilities the Waste and Minerals Plan.</u></p>		
PM099 & PM101	CP16 Open Space	<p><i>Add at the end of section 1:</i></p> <p><u>e) The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p> <p><u>Supporting Text</u> <u>However through the 2014 Urban Fringe Site Assessment Study some of the open space within the city's urban fringe has been identified as having some potential to help meet the city's housing requirements (see Policies SA4 and CP1). Unlike other urban open spaces the net loss of some open space in the urban fringe can more readily be mitigated through the provision of new publicly accessible space, enhancements to existing space or by alternative provision within the National Park and/or compensated for by the National Park's open space offer.</u></p>		
PM102	CP17 Sports Provision	<p><i>Add at the end of section 2:</i></p> <p><u>The 2014 Urban Fringe Assessment will be a material consideration in the determination of applications for residential development in the urban fringe prior to the adoption of Part 2 of the City Plan.</u></p>		

PM106	Policy CP19 Housing Mix page 209	Add new criterion a. iii) to the policy: <u>iii) introduce dwelling space standards in Part 2 of the plan to secure quality and sustainability in new residential development.</u>
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Appendix E – Assessment of Spatial Strategy

Key:

Positive impact	+
Negative impact	-
No or negligible impact	0
Uncertain impact	?
Mixed impact	-/+

Health Determinant	Health Pathway	Potential Health Outcome		Sensitive Communities	Recommendations
		Construction	Operation		
Demography	Once operational the total amount of residential development will increase the local population number, density and mix across the city, particularly within Development Areas but also within urban fringe locations.	0	+	Consideration is required to ensure the characteristics of existing neighbourhoods and communities to ensure that any existing socio-economic barriers are not created and that there is improvement to improve community cohesion particularly with surrounding socio-economically deprived communities.	Careful consideration will be required relating to the mix and type of housing across all areas to ensure a varied population demographic. Development provides the opportunity to strengthen community cohesion.
Income & Employment	Development will result in direct and indirect employment opportunities.	+	+	Sensitive communities largely relate to neighbourhood	Ensure local employment opportunities are provided specifically

	Increase resident population increases the viability of services.			areas suffering socio-economic deprivation who may not be able to take up employment opportunities.	in areas suffering socio-economic deprivation.
Education	The increased population would have associated increased demands on school places and could improve viability of some under-occupied schools, although will increase existing pressure in certain locations.	0	-/+	No particular sensitive group.	Ensure adequate school and other infrastructure requirements provided.
Housing	An additional 13,200 homes would be provided.	0	+	Sensitive communities largely include those facing socio-economic disadvantage who may not be able to take up new housing opportunities.	Ensure an appropriate type and mix of housing, in addition to affordable units.
Transport	An increased population would increase local private car use. Recognised that the majority of development is located within the	0	-/+?	Sensitive groups include those susceptible to reduction in air quality.	Ensure sustainable transport solutions are provided to meet the needs of communities on the urban fringe.

	built up area where sustainable transport is good. Housing on the urban fringe may result in localised impacts and will depend upon location.				
Crime and Safety	There are no direct impacts on this health pathway.	0	0	No particular sensitive group.	
Access and Accessibility	The Spatial Strategy will result in a range of housing, employment and retail development across the city. Access to services is good within central locations. Access to services for communities in urban fringe locations may be limited.	0	-/+?	No particular sensitive group.	Ensure sustainable transport solutions, and local services and facilities are provided in urban fringe locations.
Services, amenities and leisure	Increased population will increase the need for services and amenities and could improve viability in some locations.	0	+	No particular sensitive group.	
Lifestyle	Loss of open space to residential within	-	-	Lack of open space impacts on the	Ensure open space is provided where

	the urban fringe could impact upon lifestyle, as could discourage or make more difficult access to open space for recreation and health purposes.			health of all communities, however will impact on the health of deprived the most. Communities facing socio-economic disadvantage may be susceptible to loss of recreation space within the urban fringe.	possible, and that development includes improved access to remaining areas of open space. Ensure HIA looks at the potential for adverse impacts on this sensitive community and maximises potential health outcomes.
Health Needs	The delivery of new homes will increase demand on local health services. Development within the urban fringe may require additional provision in this location.	0	-	No particular sensitive group.	Ensure necessary health infrastructure is delivered to meet increase in demand in all locations.
Environment	The majority of development is located within the built up area. New development has the potential to improve the environment, particular townscape and streetscape in locations in need of regeneration. The Spatial Strategy recognises that the	-	-/+?	No particular sensitive group.	Ensure necessary mitigation to minimise or reduce any adverse environmental impacts.

	urban fringe forms part of the city's green infrastructure. Development in this location could have adverse impacts for the local environment.				
Food Access	Allotments form part of the urban fringe. Development in this location could result in a reduction in allotment space however is uncertain until sites are brought forward.	0	?	No particular sensitive group.	Ensure access to food is a consideration in housing schemes across the city and ensure no net loss of allotment provision across the city.



**Brighton & Hove
City Council**