

**Hove Station Neighbourhood Plan**

**Final Strategic Environmental Assessment Determination**

**Brighton & Hove City Council, November 2016**

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# Screening Statement on the determination of the need for Strategic Environmental Assessment (SEA) for the Hove Station Neighbourhood Plan

## 1. Introduction and Summary of Statutory Consultation

- 1.1 National Planning Practice Guidance states that Local Planning Authorities should have a process in place, as part of its duty to advise or assist, to determine whether or not Neighbourhood Plans are likely to result in significant effects, in accordance with Regulation 9 of the Environmental Assessment of Plans & Programmes Regulation 2004. In July 2016, Hove Station Neighbourhood Forum requested Brighton & Hove City Council to carry out a screening exercise based on the draft Hove Station Neighbourhood Plan Vision and Objectives, to determine whether the Hove Station Neighbourhood Plan would require a Strategic Environmental Assessment (SEA).
- 1.2 The screening process involved the following stages:
- Identification of constraints, receptors and their sensitivity
  - Assessment of the characteristics of the Neighbourhood Plan
  - Assessment of the effects of the Neighbourhood Plan
  - Initial Brighton & Hove City Council conclusion
  - Consultation with the three statutory environment bodies (Natural England, Environment Agency and Historic England)
  - Final conclusion
- 1.3 Brighton & Hove City Council formed an initial conclusion that the Hove Station Neighbourhood Plan would require a SEA. In order to meet the requirements of Regulation 9 (2b) of the Regulations, the draft screening report was sent to the three statutory environmental consultees, Natural England, Environment Agency and Historic England.
- 1.4 Responses were received from the Environment Agency and Historic England. No response was received from Natural England. Both SEBs concurred with the findings of the draft Screening Statement with regards to issues within their remit. A copy of the full responses received can be found in Appendix B. A summary of the comments received can be found below.
- 1.41 Environment Agency
- Considers that the Plan has the potential to give rise to significant environmental effects due to:
    1. the potential amount of housing to be delivered
    2. development on potentially contaminated land above the Brighton Chalk Aquifer, which is vulnerable to pollution
- 1.42 Historic England
- Confirms agreement with the screening opinion, including the need to consider the effects of the Plan on the conservation areas and listed buildings within the Plan area.

- 1.5 In summary, the screening process based on the Hove Station Neighbourhood Plan Vision and Objectives, carried out by Brighton & Hove City Council in consultation with the three statutory consultees indicates that a Strategic Environmental Assessment of the Hove Station Neighbourhood Plan should be carried out to cover the following issues.

Air & Climatic Factors:

- AQMA
- Transport and congestion
- Surface Water Flood Risk

Material Assets:

- Infrastructure (schools)
- Local economy

Water

- Quality and supply
- (also linked to Climatic Factors)

Cultural Heritage:

- Conservation Areas
- Listed Buildings

Material Assets:

- Open Space
- Health infrastructure

Population & Human Health:

- Noise
- (also linked to air quality)

- 1.6 The SEA should be carried out by the Neighbourhood Forum or other relevant body and should follow the process set out in the SEA Regulations and summarised in Section 7 of this report.

## 2. Legislative Background and Neighbourhood Planning

- 2.1 The Government has confirmed in its 'National Planning Practice Guidance'<sup>1</sup> that Sustainability Appraisals are only required for Development Plan Documents and do not apply in the case of Neighbourhood Plans. However, Neighbourhood Plans must not breach and must be otherwise compatible with EU and Human Rights obligations<sup>2</sup>. Neighbourhood Plans therefore need to be considered against, for example, the Habitats and Strategic Environmental Assessment Directives and associated regulations.
- 2.2 Strategic Environmental Assessment (SEA) is required by EU Directive 2001/42/EC, to assess the effects of certain plans and programmes on the environment. This Directive was implemented in the United Kingdom in July 2004 with the adoption of the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations)<sup>3</sup>.
- 2.3 Some types of plan will automatically trigger the requirement for an SEA whereas others will only need a SEA if they are determined (screened) to lead to significant environmental effects as set out in the Regulations Part 2 (5). The following two types of plans will always require an SEA and do not need to go through the screening procedure:
- The plan is for town and country planning **and** sets the development framework for future consent of projects listed in Schedule 1 or 2 of the Environmental Impact Assessment Regulations (Regulation 5 (2a and 2b)).<sup>4</sup>
  - The plan requires an assessment under the Habitats Directive (Regulation 5(3)).<sup>5</sup>
- 2.4 The following type of plan only requires an SEA if determined to lead to significant effects:
- The plan sets the future development consent framework that does not fall in the above two categories but has been determined to be likely to have significant environmental effects (Regulation 5 (4b and 4c)).
- 2.5 In the case of plans listed in paragraph 2.3 above, there is an exemption if the plan deals with the use of a small area at local level, OR is a minor modification of a plan, and in both cases where it has been determined under Regulation 9(1) that the plan is unlikely to have significant environmental effects.

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<sup>1</sup> NPPG Paragraph 026 <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>

<sup>2</sup> NPPG Paragraph 078 <http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/eu-obligations/>

<sup>3</sup> SEA Regulations: [http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi\\_20041633\\_en.pdf](http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf)

<sup>4</sup> EIA Regulations: [http://www.legislation.gov.uk/uksi/2011/1824/pdfs/uksi\\_20111824\\_en.pdf](http://www.legislation.gov.uk/uksi/2011/1824/pdfs/uksi_20111824_en.pdf)  
and Amendments 2015: [http://www.legislation.gov.uk/uksi/2015/660/pdfs/uksi\\_20150660\\_en.pdf](http://www.legislation.gov.uk/uksi/2015/660/pdfs/uksi_20150660_en.pdf)

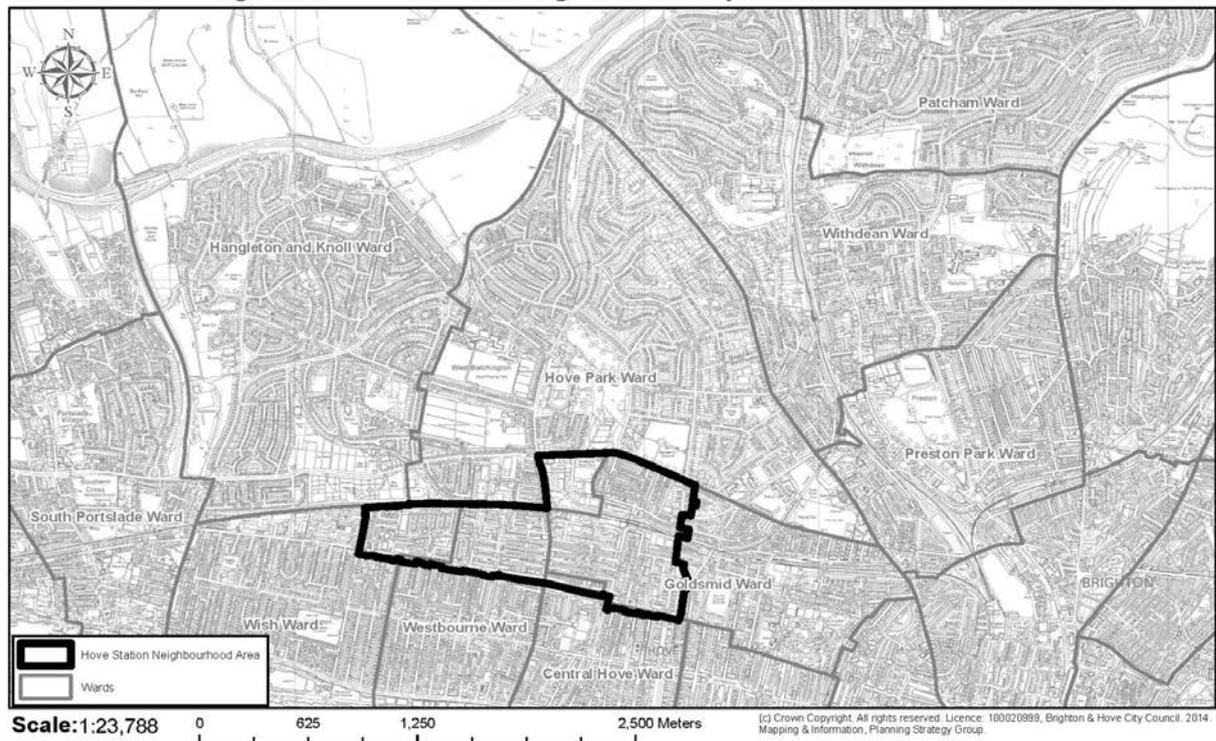
<sup>5</sup> Habitats Assessment Regulations: <http://www.legislation.gov.uk/uksi/2010/490/contents/made>

- 2.6 The likelihood of significant effects is identified through a screening determination. Schedule 1 of the SEA Regulations sets out the specific criteria for determining the likely significance of the effects of a plan. These criteria include the consideration of the characteristics of the plan and the probability, duration, frequency, reversibility and cumulative nature of the effects. Schedule 2 sets out the issues that must be covered as follows: a) biodiversity, b) population, c) human health, d) fauna, e) flora, f) soil, g) water, h) air, i) climatic factors, j) material assets, k) cultural heritage, and l) landscape.
- 2.7 Whether or not a Neighbourhood Plan will need an environmental assessment will be subject to their scope and the issues they are seeking to address. In most cases it is assumed that the requirement for SEA will depend on whether the plan is determined as likely to have significant effects. These effects can be positive as well as negative. Under Article 3(4) of the Directive, and Regulation 9 of the Regulations, the responsible authority (the city council) must determine which plans, other than those for which an SEA is automatically required, are likely to have significant effects.
- 2.8 It should be noted that a Neighbourhood Plan cannot include development that is listed under Schedule 1 of the Environmental Impact Assessment Regulations.

### 3. Hove Station Neighbourhood Plan

- 3.1 Hove Station Neighbourhood Forum submitted its application to Brighton & Hove City Council, for designation of its Neighbourhood Area in December 2013. After a formal six week consultation Brighton & Hove City Council Economic Development & Culture Committee on 18<sup>th</sup> September 2014 refused to designate the area sought in the application, however designated a smaller area as the Neighbourhood Area. The reason for this was due to a separate application to designate an adjacent Neighbourhood Area (Hove Park), which overlapped and included land proposed to be included within the Hove Station Neighbourhood Area. The Hove Station designated area is shown below.

**Hove Station Neighbourhood Area – designated 18 September 2014**



- 3.2 The overall vision for the Hove Station Neighbourhood Plan, taken from “An Emerging Vision for the Station Area, Consultation Draft, November 2015” is:

*“To facilitate the regeneration of the Hove Station Neighbourhood Area and realise its potential by creating a vibrant, coherent community which is a great place to live, work and relax in.”*

The plan aims to achieve:

- *A strong and diverse community;*
- *Mixed but complementary land uses although predominantly residential;*
- *Better connectivity and permeability through the area – especially across the railway divide;*
- *Prioritising sustainable travel and unlocking existing transport bottlenecks;*

- *Rich urban character drawing on historical design/architectural legacy;*
- *“Urban” high density: mid-rise development as standard with landmark high rise developments as signature projects at key locations;*
- *Housing with good space and sustainability standards based on national standards;*
- *New and improved social facilities, schools, nurseries, as needed for the increased population;*
- *Green, natural and attractive with spaces for communal activities;*
- *Reduced carbon emissions through low carbon new buildings, improved energy efficiency of existing buildings, sustainable and local generation and use of renewable energy;*

*“The vision for the areas north and south of Hove Station, Development Area 6 of the City Plan (DA6), is that it will undergo wholesale redevelopment during the plan period (up to 2030). The remaining areas of the Hove Station Neighbourhood will be subject to less change and the plan sets out some minor, but important proposals that are essential for those areas.”*

- 3.3 It is evident from the above Vision & Objectives and draft Neighbourhood Plan that the Plan will include land allocations, with particular reference to areas of land south of the railway line around Hove Station, including the Conway Street area as well as the Sackville Road Trading Estate. The draft Neighbourhood Plan indicates that quantum of development likely to “*substantially exceed the allocations suggested in the City Plan*” with some indicative figures of 1,333+ housing units (compared to 525 units in the City Plan).
- 3.4 Once adopted, the Hove Station Neighbourhood Plan, in conjunction with other citywide adopted planning policies, will be applicable to all applications for development consent and will guide planning decisions within the defined Hove Station Neighbourhood Area.

## **4. Screening Assessment of the Hove Station Neighbourhood Plan**

### **4.1 Introduction to the screening assessment**

This stage involved three main steps:

1. Identification of the environmental constraints, receptors or other attributes of the area as outlined under paragraph 2.6 which could be affected by the Neighbourhood Plan, and their relative sensitivity.
2. Assessment of the characteristics of the Neighbourhood Plan against a set of criteria that are set out in Schedule 1 of the SEA Regulations 2004.
3. Assessment of the effects of the Neighbourhood Plan against a set of criteria that are set out in Schedule 2 of the SEA Regulations 2004.

### **4.2 Identification of constraints and receptors within the Neighbourhood Area**

4.21 The following table sets out the various environmental receptors, as well as attributes of the area, and whether they could be sensitive to impacts arising from the Neighbourhood Plan. Receptors have been grouped into themes derived from the SEA topics presented in the Regulations.

4.22 This table indicates whether there is a potential for adverse impact, whether it is considered unlikely, or whether it is not expected. It also indicates whether the impact could be of low, medium or high significance, and this is based on the sensitivity of the receptor. Any of the impacts identified will depend on the nature and scale of development and the policies and proposals put forward in the Neighbourhood Plan. The table also indicates whether there is potential for positive impact.

**Table 1: Local constraints and receptors and their sensitivity**

<b>SEA feature</b>	<b>Further explanation / current situation</b>	<b>Impacts/Significance / Sensitivity</b>
<b>Biodiversity, fauna and flora</b>		
European Sites <i>(Local View)</i>	Castle Hill Special Area of Conservation lies approximately 8km to the west of the Hove Station Neighbourhood Area (NA) boundary.	<b>No adverse impacts on European sites</b> due to location of NA.  See Habitats Regulations Assessment informal pre-screening (Annex 1) which discounted the likelihood of significant adverse effects on the SAC.
National Sites <i>(Local View)</i>	Castle Hill (National Nature Reserve and SSSI) approximately 8km to the west of the Hove Station NA.  Brighton Marina to Newhaven Cliffs SSSI located approximately 6.5km to the west of the NA.  Beachy Head West Marine Conservation Zone, extends from the Marina to Beachy Head, approximately 6.5km west of the NA.	<b>No adverse impacts on national sites</b> due to location of NA.
Local Sites <i>(Local View)</i>	There are no Local Nature Reserves within the NA boundary or immediately adjacent to the boundary. The nearest LNR is Eldred Avenue and Withdean Woods LNR approximately 1.5km to the north of the NA.  There are no Sites of Nature Conservation Interest (SNCIs) within the NA boundary or adjacent to the boundary. The nearest SNCI is Three Cornered Copse approximately 1.5km to the north of the NA.	<b>No adverse impacts on local sites</b> due to location of NA.
Ancient woodland <i>(magic)</i>	There are no areas of ancient woodland within the Hove Station NA, nor in the immediate vicinity. The nearest area of Ancient Woodland is in Withdean Woods, approximately 1.5km to the north of the NA.	<b>No adverse impacts on Ancient Woodland</b> due to location of NA.

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
<b>Soil</b>		
Geological Sites	The Goldstone is a Regional Important Geological site (RIG) which features a large sarsen stone and ten smaller stones. This lies adjacent to the Hove Station NA and is situated within Hove Park.	<b>There is potential for adverse impacts</b> and this is considered to be of <b>low significance</b> , based on the sensitivity of the designation.
Agricultural Land <i>(magic – landscape)</i>	There are no areas of designated agricultural land within the NA. The NA is entirely urban in nature and lies within the built up area boundary.	<b>No adverse impacts</b> on agricultural land.
Mineral deposits	There are no known mineral sites within the NA.	<b>No adverse impacts</b> on mineral deposits.
Contaminated land	The extent of contamination within the NA is unknown. There could be potential for contaminated land within the NA, for example, on the coalyard site, and on land that is currently in employment uses, such as garages, which may have resulted in land contamination. Industrial estates/employment land are sometimes located on sites which were contaminated through previous uses that may have led to contamination.	<b>There is potential for positive impacts through the remediation of contaminated land.</b> The potential for positive impacts are considered to be of <b>medium significance</b> , based on the potential for remediation to help improve soil and water quality. Any potential contamination issues would need to be investigated and addressed as part of any planning application.
<b>Water</b>		
Water quality <i>EA SPZ maps</i>	<p>The Brighton Chalk Aquifer is an important source of Public Water Supply. This has been designated “poor” status due to quality and quantity. The Aquifer is vulnerable to rural and urban pollution and the whole of the city is part of a Nitrate Vulnerable Zone.</p> <p>There is a Groundwater Source Protection Zone within the NA. Zone 1 (highest risk of contamination) covers the northern tip of the NA. A large proportion of the NA is located within Zone 2. A small proportion of the NA lies outside the Source Protection Zone.</p>	<p><b>Potential for adverse impacts.</b></p> <p>Development can increase the risks of pollution, for example through disturbance of potential contaminants. A Groundwater Source Protection Zone is particularly vulnerable and this covers most of the NA.</p> <p>Development will increase demand for water, with Brighton Chalk Aquifer already heavily exploited.</p> <p>Impacts on water quality from the HSNP considered to be of <b>medium sensitivity/significance</b>.</p>
Water supply	The South East is declared as being under water stress. The	<b>Potential for adverse impacts.</b>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
<i>EA groundwater vulnerability maps</i>	entire city is covered by a Major Aquifer with High vulnerability.	Development will increase demand for water.  Impacts on water supply from the HSNP considered to be of <b>medium sensitivity/significance</b> .
<b>Air</b>		
<p data-bbox="138 405 336 501">Air Quality Management Area</p> <p data-bbox="138 545 282 660"><i>(Local View Air Quality Monitoring Reports)</i></p>	<p data-bbox="385 405 1267 686">Brighton &amp; Hove has an AQMA (2013) due to the exceedance of NO<sub>2</sub>. The AQMA includes some roads within the Hove Station NA including the entire stretch of Sackville Road, the junction area around Sackville Road/Portland Road/Clarendon Villas, and the stretch of Old Shoreham Road between the Sackville Road and Fonthill Road junctions. It is however recognised that these areas are not the worst case locations within the AQMA.</p> <p data-bbox="385 692 1267 871">Vehicles are the predominant cause of air pollution in the city particularly from diesels, older and heavier vehicles. Buses travel on the Sackville Road, Blatchington Road and Portland Road, all of which are within the HSNA, however the predominant form of transport on these roads are cars.</p> <p data-bbox="385 877 1267 1094">Monitoring of NO<sub>2</sub> on Sackville Road/Old Shoreham Road junction (at Hove Park Pub) shows levels have improved over the 5 year period from 46.4µg/m<sup>3</sup> in 2011 to 37.2µg/m<sup>3</sup> in 2015. The 5 year average at this monitoring location is 40.8µg/m<sup>3</sup>, therefore only just exceeding the Air Quality Objective (AQO) of 40µg/m<sup>3</sup>.</p> <p data-bbox="385 1101 1267 1241">Monitoring just outside the NA at the New Church Road and Hove Street junction has a five year average of 31.8µg/m<sup>3</sup>, well within the AQO. The rest of the Sackville Road area within the NA is compliant with the AQO.</p>	<p data-bbox="1312 405 1760 430"><b>Potential for adverse impacts.</b></p> <p data-bbox="1312 437 2051 762">Sackville Road has a weak canyon effect. This is where the existing streetscape does not allow for easy dispersal of air pollutants. Air pollutants can get trapped in these areas, particularly when traffic doesn't flow. However, air pollutants generally disperse well in this location as traffic generally flows well, although any significant increase in volume of traffic in this location may result in poorer traffic flow.</p> <p data-bbox="1312 769 2051 1383">The HSNP indicates potential to deliver over 1,300 residential units mainly in and around the Hove Station area (north and south of the railway line and station including Sackville Road Trading Estate, Goldstone Retail Park and Conway Street areas). In addition, approximately 20,000sqm B1/B8 employment floorspace will be delivered in this area. Although this area is considered to be a sustainable location for new development due to its proximity to existing public transport, the amounts of new development anticipated is still likely to result in additional vehicle movements in and around the area, including traffic that passes through the Sackville Road/Old Shoreham Road junction. This could adversely impact air quality in this location. This would be of <b>high significance</b> due to the existing sensitivity of this particular junction. In</p>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
		<p>addition, residential development located along the northern and western edges of the Sackville Road Trading Estate and along the Old Shoreham Road would be highly sensitive to poor air quality and this would need to be considered in the design of any scheme.</p> <p>AQMAs are of high sensitivity. The potential for adverse impact could therefore be of <b>high sensitivity and high significance</b>.</p>
Congestion	<p>The NA contains some key main roads; the Old Shoreham Road runs west-east along the northern boundary of part of the NA; Portland Road and Blatchington Road run west-east along the southern boundary of part of the NA, Sackville Road runs north-south through the NA; and The Drive runs north-south along the eastern edge of the NA. All of these roads are key routes into and out of Hove and beyond.</p> <p>There are some frequent bus routes that travel throughout the NA including the 5, 46 and 49 travelling along Sackville Road, Portland Road and Blatchington Road.</p> <p>The area is well served by rail with Hove Station being within the HSNA, as well as Aldrington Station, providing links into Brighton, London and west along the coast.</p> <p>Although detailed transport data is not available for the area, it is likely that the predominant form of transport movement throughout the area is the private car.</p> <p>Anecdotal evidence suggests that main routes through the area, including Portland Road, Sackville Road, Fonthill Road, Blatchington Road and The Drive are all busy routes with traffic</p>	<p><b>Potential for adverse impacts.</b></p> <p>The HSNP indicates potential to deliver over 1,300 residential units mainly in and around the Hove Station area (north and south of the railway line and station including Sackville Road Trading Estate, Goldstone Retail Park and Conway Street areas). In addition, approximately 20,000sqm B1/B8 employment floorspace will be delivered in this area. Although this area is considered to be a sustainable location for new development due to its proximity to existing public transport, the amounts of new development anticipated is still likely to result in additional vehicle movements in and around the area. Development within the area, which could include that coming forward as a result of the Plan, or other development, as well as development from outside the area could impact on congestion and transport patterns within and outside the area.</p> <p>This could be of <b>high significance</b> due to existing pressures on road network, with the roads being sensitive to development.</p>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
	often becoming congested at peak times. Fonthill Road can be used as a cut-through/short-cut and may not be the most appropriate or suitable route.	
<b>Climatic Factors</b>		
Flood Risk (tidal)  <i>SFRA</i>	Only the beach area in Brighton & Hove is located within Flood zone 2 and 3 (medium to high risk of flooding). All of the NA is therefore located within Flood zone 1 (low risk of flooding).	<b>No adverse impacts</b> due to tidal flood risk due to location of NA.
Flood risk (Surface water)  <i>SFRA Local Flood Risk Management Strategy EA updated flood risk map for surface water (watermaps website)</i>	The EA updated flood map for surface water flooding shows there are some areas at high risk of surface water flooding, including around the Goldstone Retail Park area, and throughout the residential areas south of the railway line to the Blatchington Road area. There is a clear flow route through the area flowing from the north (Hove Park) to the south (seafront).	<b>Potential for adverse impacts.</b> There is a risk that development could be located in areas of higher surface water flood risk, or increase the risk of flooding elsewhere due to the clear flow routes flowing through the area from the north to the south. This could be of <b>high significance</b> depending on the types of development located in these areas and how sensitive they are to flooding.
Transport patterns  <i>(Census data Local Insight Report for HSNA (bhconnected) Neighbourhood</i>	A higher proportion of residents living within the NA have no car compared to the Brighton & Hove average; 41% compared to 38%. However a higher proportion of residents living within the NA have access to 1 car compared to the Brighton & Hove average; 47% compared to 43%. The proportion of residents with more than one car is lower than the Brighton & Hove average.	<b>Potential for adverse impacts.</b> Despite proximity to public transport options, there is a risk that development in this location could increase car-based transport and other vehicle movements. The HSNP indicates potential to deliver 1,300 new homes, and this could result in an increase in the numbers of cars owned locally,

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
<i>statistics)</i>	Analysis of data at Middle Layer Super Output Area (BH016 and BH019) <sup>6</sup> indicates that a lower proportion of working age residents in the area travel to work by car (26%) than the BH average (40%). However a lower proportion travel to work by public transport (21%) than the BH average (24%) and a lower proportion travel to work on foot/bike (19%) than the BH average (25%).	contributing to local CO2 emissions and congestion and having other impacts, e.g. air quality and noise both of which are issues locally (see other sections). In addition, an increased population would result in an increase in services required, e.g. food and other shopping deliveries, also adding to vehicle movements within the area. This could be of <b>high significance</b> due to the sensitivity of the area (in terms of air and noise) and the current capacity of the road network.
<b>Cultural Heritage</b>		
Scheduled Ancient Monument  <i>(Local view)</i>	There are no SAMs within the NA, nor within close proximity. The nearest SAM is located on Round Hill north of the A27.	<b>No adverse impacts.</b>
Archaeological Notification Area  <i>(local view)</i>	There is one ANA located within the NA. The Hove Park ANA covers the northern tip of the Goldstone Retail Park as well as extending across the Old Shoreham Road to cover Hove Park. It is designated due to prehistoric and roman activity.	<b>Adverse Impacts unlikely.</b> The ANA is already located within an urbanised area. It is considered unlikely that any development, including redevelopment of the Goldstone Retail Park, will have any further impact on the ANA. It is assumed that existing development in this location is likely to have disturbed archaeological potential and therefore potential for additional disturbance is considered to be low. However, this would need to be investigated and assessed as part of any planning application. Should any further assessment indicate potential for archaeology then

<sup>6</sup> Middle Layer Super Output Areas BH016 and BH019 cover an area greater than the HSNA as they also include the residential area north of the railway line around the Lullington Avenue area, and the residential area south of Blatchington Road around the St Andrew's School area, however data at this level helps to provides a useful estimate for the HSNA.

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
		this should be investigated, preserved is possible and recorded.
Registered Park & Garden	There are no Registered Parks and Gardens within or near to the Hove Station Neighbourhood Area.	<b>No adverse impacts.</b>
Listed Buildings <i>(local view)</i>	There are numerous listed buildings within the HSNA including Hove Station, Ralli Hall, residential properties on the northern side of Cromwell Road, residential properties on either side of The Drive, and various churches: All Saints, Holy Trinity, St Barnabus, Hove Methodist, and St Peter's. The majority of the listed buildings are Grade II, with the exception of St Barnabus Church which is Grade II*.	<b>Potential for adverse impacts.</b> The vision of the HSNP includes to achieve “urban high density: mid-rise development as standard with landmark high rise development as signature projects at key locations”. The NP may allocate sites or promote development, including mid-rise or high-rise buildings, which may impact upon listed buildings or their settings. Impacts considered to be of <b>medium significance</b> due to the nature of the designations and their sensitivity, taking into account the existing built environment. Redevelopment could however provide the potential to improve their setting.
Conservation Areas <i>(Local view)</i>	There are four Conservation Areas that fall within the NA; Hove Station, Denmark Villas, The Willett Estate, and The Drive Conservation Areas. These cover approximately one quarter of the area of the NA.	<b>Potential for adverse impacts.</b> The vision of the HSNP includes to achieve “urban high density: mid-rise development as standard with landmark high rise development as signature projects at key locations”. The NP may allocate sites or promote development, including mid-rise or high-rise buildings which may impact on the setting of the Conservation Areas. Impact could be of <b>medium significance</b> due to the nature and sensitivity of the designation, and taking into account the existing built environment. Redevelopment could however provide the potential to improve their setting.
<b>Landscape</b>		

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
National Park <i>(Local View)</i>	The NA does not include any land that falls within the South Downs National Park. The closest part of the SDNP to the NA is the area that forms Round Hill, which lies beyond the A27 at the Hangleton area.	<b>Adverse impacts unlikely.</b> The NA is situated well within the built up area and away from the SDNP boundary. Although development within the built up area could impact on views of or from the SDNP, significant impacts on the SDNP are considered unlikely due to the existing buildings within the NA, which includes tall buildings. The Hove Station area is a node where tall buildings are considered acceptable.
<b>Material Assets</b>		
Open Space <i>OSSR Study Update 2011 Local View –all open space</i>	<p>Figures for the amount of open space and whether there are deficiencies or surpluses in the actual HSNA are not available. The Open Space Study Update (2011) assessed provision within the sub-areas “South Portslade, Wish &amp; Westbourne” and Goldsmid, Brunswick and Central Hove” which cover the HSNA. However, both these sub-areas include areas outside the HSNA and also don’t take into account that some open space is outside the sub-areas but in close proximity to the HSNA and therefore within accessibility standards.</p> <p>Within the first sub-area, there were deficiencies across all typologies (for which there is a standard) for the population level in 2007.</p> <p>Within the second sub-area, the only typology (for which there is a standard) which met/exceeded the quantity standards for the population at that time is Outdoor Sports Facilities.</p> <p><i>(Note: the following typologies have standards: Allotments, Amenity Greenspace, Children &amp; Young People, Natural/Semi-natural, Outdoor Sports, and Parks &amp; Gardens.)</i></p>	<b>Potential for adverse impacts.</b> Open space provision within the sub-areas that contain the HSNA was assessed as being deficient in almost all typologies for which there is an open space standard for the population levels in 2007. This deficiency is therefore predicted to increase with an associated increase in population. This is likely to be of <b>medium significance</b> . It is recognised that there are other areas of open space within close proximity to the HSNA that fall within access standards, including Hove Recreation Ground and Hove Park to the north, and the seafront to the south, however most of the wards in central Hove area have deficiencies in open space.
Schools	There is one infant school and one junior school within the NA,	<b>Potential for adverse impacts.</b>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
<p>(council website)</p>	<p>West Hove Infants and Hove Juniors (School Road/Portland Road sites), and one CE primary school immediately adjacent to the NA; St Andrew's. In addition, the Connaught Road site of West Hove Infants is also located adjacent to the NA. The Bilingual Primary School is located to the north of the NA within Hove Park. West Hove infants and Hove Juniors are both larger than average schools (8 form entry) with each school split over two sites (with other sites located just outside the HSNA but serving the local population). Primary aged school place capacity has more than doubled in the last 5 years to try to accommodate the increasing demand for school places in the area.</p> <p>There are no secondary schools within the NA. Two secondary schools are located within the Hangleton area both of which mainly serve the Hove population. The recently opened CE King's School, which is located in Portslade, also takes pupils from Hove. The council has recently consulted on options for secondary school allocations, due to the anticipated opening of a new secondary school (run by the University of Brighton), and due to the recognition that secondary places across the city are unlikely to meet demand from around 2019 onwards.</p> <p>According to the School Allocations 2016/2017 the number of places/allocations for school year 2016/2017 as follows:  WH Infants (School Rd) – 120 available / 120 allocated.  WH Infants (Connaught Rd) - 120 available / 120 allocated.  St Andrew's Primary – 90 available / 90 allocated.  Hove Juniors (Portland Rd) – 128 available / 128 allocated.  Hove Juniors (Holland Rd) – 128 available / 103 allocated  Bilingual School – 90 available / 81 allocated.  Hove Park Secondary – 300 available / 273 allocated.</p>	<p>According to the allocations information, there appears to be no surplus capacity at infant level. There appears to be some surplus at Junior level in the area, although it is unknown whether this capacity has been filled after allocation day by late applications.</p> <p>There was some surplus capacity at secondary level in 2016/17 although it is recognised that the increase in primary places that has taken place over recent years has not yet reached secondary level, anticipated for 2018/19 onwards.</p> <p>The HSNP indicates potential to deliver 1,300 new homes. Residential development at this scale in this location is highly likely to increase pressure on local schools and these would be <b>highly sensitive</b> to development.</p> <p>The Vision &amp; Objectives includes "<i>new and improved schools as needed for the increased population</i>" which could have positive impacts if a suitable site/provision is provided in a timely manner.</p>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
	Blatchington Mill Secondary – 300 available / 300 allocated. Nb: it is noted that these figures relate to allocations day only, and that any available spaces may have been filled with late applications, appeals etc.	
Housing <i>OCSI report</i>	The average house price (all types of housing 2015) in the HSNA was £330,411. This is lower than the BH average: £353,586, and higher than the English average: £275,852. Across Brighton & Hove, affordable housing delivery is lower than that required to meet local needs.	<b>Potential for positive impacts.</b> Housing affordability is an issue across the whole of the Brighton & Hove area. The Vision & Objectives includes housing as a key objective although does not reference affordability. The draft Neighbourhood Plan includes an approach to delivery of affordable homes. Delivery of housing through the Plan could result in positive impacts. This could be of <b>high significance</b> given the cost of housing locally and the need/demand for affordable housing.
Public transport <i>Buses.co.uk</i> <i>Railway links</i>	The HSNA is well served by the local bus network. Bus services mainly operate in an east-west direction through the area. The Hove bus depot is located within the HSNA. The HSNA includes Hove Station and Aldrington Station, with Hove Station part of the west coast mainline, with links to Brighton, London and the west coast, and Aldrington Station also on the coastal routes linking to Brighton and Southampton. Despite good public transport links, travel to work by public transport is lower than the BH average.	<b>Potential for adverse impacts.</b> Development could increase bus patronage, particularly at peak times, when services are already busy. Development around the Hove Station area in particular could increase train patronage, with travel at peak times already over capacity on routes to London. Public transport provision could be sensitive to further development although this is likely to be of <b>low significance</b> .
Local services (shops) <i>(Local View, AMR)</i>	The HSNA includes Blatchington Road, which forms part of the Hove Town Centre, and all of the Portland Road Local Centre. Both the Town Centre and Local Centre include a variety of uses to meet various local needs. Hove Town Centre had the lowest vacancy rates across all types of centres in the city (2013/2014) at only 3%.	<b>Adverse impacts unlikely.</b> Local shops and services are considered to have <b>low sensitivity</b> . The Vision and Objectives has no reference to supporting/improving the local economy and refers to predominantly residential development. The draft Neighbourhood Plan states that small

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
		<p>scale retail would be acceptable but that large retail floorspace over 1,000smq would not be acceptable. Development in this location could boost local economic activity having potential for positive impacts, however it will be important that any new retail development does not undermine the existing retail centres.</p>
<p>Health services</p> <p><i>(BHCC maps, nhs website)</i></p>	<p>There is one GP based in the west of the HSNA (Wish Park surgery, Portland Road) and a further 4 doctors surgeries serving the local area in close proximity to the HSNA. A new surgery is being built within the HSNA (Blatchington Road area). The local children centre is located at Conway Court, within the HSNA, providing health visiting and other services including dentistry.</p> <p>Hove Poly Clinic, located to the north of the HSNA provides a range of outpatient services, including mental health and other specialist services.</p> <p>Emergency care – Royal Sussex County Hospital situated in the east of Brighton.</p>	<p><b>Potential for adverse impacts.</b></p> <p>Some, but not all, of the doctors surgeries are accepting new patients, suggesting that there is some capacity within the area.</p> <p>General and more specialist health services appear available within the HSNA as well as the wider Hove area.</p> <p>However, a significant increase in population that would result from delivery of 1,300+ residential units would put pressure on existing health services. This is considered to be of <b>medium</b> significance.</p>
<b>Population &amp; Human Health</b>		
<p>Demographics</p> <p><i>(OCSI Community Insight Report, Census table KS101EW)</i></p>	<p>There are 14,005 people living in the HSNA (ONS 2014). The population density in the HSNA is very high at approximately 140 people/hectare, compared to the BH average of 33 people/hectare, although the actual population density in the city's urban area is much higher due to around half of the city's administrative area being within the SDNP and largely unpopulated. The South East average population density is 4.5 people/hectare.</p> <p>The population increased at a higher rate than across Brighton &amp; Hove between 2001-2011; with a 15% increase compared to a 10% increase.</p> <p>The HSNA has a slightly higher proportion of 0-15s and 16-64s</p>	<p><b>Impacts unknown.</b></p> <p>It is unknown whether the HSNP will influence the existing population demographic, as this will be driven by factors such as mix and type of housing, housing affordability and so on. The HSNP indicates potential for an additional 1,300 residential units and this will lead to a significant increase in population density in the area, which is already high. Any impacts would be of medium significance.</p>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
	<p>than BH and a lower proportion of over 65s. The majority of residents identify as White British (78%) which is slightly less than the BH average of 80%.</p>	
<p>Jobs and employment (OCSI Community Insight Report)</p>	<p>The proportion of working age adults claiming either Job Seekers Allowance or incapacity benefits is similar to the BH average (1.6% HSNA compared to 1.5% BH). The proportion of economically active adults in the HSNA is higher than both the BH and England average at 78% compared to 71% and 70% respectively. The three main employment sectors for people living in the HSNA are health &amp; social care, education and retail. It is not known what proportion of jobs are met locally however there are existing employment areas within the HSNA including the protected industrial estate on Newtown Road (protected through City Plan Part 1 –policy CP3).</p>	<p><b>Potential for adverse impacts.</b> Employment levels within the NA are good and higher than the local average. The Vision &amp; Objectives section of the draft HS Neighbourhood Plan does not include any objectives relating to the local economy or economic development, but suggests that development will be predominantly residential. The draft HSNP indicates that safeguarded industrial employment areas within the HSNA should be removed to allow for mixed use development in the area. However the nature of this mix of use is not specified. The document suggests removal of the allocation for Newtown Road Industrial Estate from policy CP3.3 in the adopted City Plan Part One. The Employment Land Study (2012) found there to be a strong demand for industrial floorspace in the city and that existing provision was often limited and in unsuitable locations. The Employment Land Study indicated that there will be a requirement for additional industrial floorspace in the city by 2030 and this is reflected in the City Plan Part 1 policies. Of relevance to the Hove Station NA, the Newtown Road Industrial Estate is protected for business, manufacturing and warehouse (B1, B2 and B8) uses within policy CP3. Therefore, the draft HSNP goes against the findings of the Employment Land Study and is not in accordance with the local Development Plan.</p>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
Vulnerable Groups  <i>(OCSI Community Insight Report)</i>	<p>The proportion of people within the HSNA claiming Disability Living Allowance is similar to the BH and England average (4.9% compared to 4.7%). The proportion of people claiming Attendance Allowance is higher than BH and England averages (19% compared to 14%).</p> <p>The proportion of children in poverty is lower than the BH and England average (12% compared to 17% and 19% respectively).</p>	<p>This is considered to be of <b>high significance</b>.</p> <p><b>No Impacts.</b> It is considered unlikely that the HSNP will have any significant influence, either in a positive way or adverse way over vulnerable groups.</p>
Crime / safety  <i>(Community Insight Report, Index for Multiple Deprivation)</i>	<p>All recorded crimes (all crimes) in the HSNA are lower per 1,000 population than the BH and England average (125 per 1,000 population compared to 285/1,000 population in 2015.) According to the IMD 2015, most Super Output Areas located within the HSNA have relatively low levels of deprivation in the crime domain (in the 50%, 40%, and 30% least deprived), however the area around Blatchington Road is situated within the 30% most deprived.</p>	<p><b>No impacts.</b> Levels of crime are lower than average in the area. It is considered unlikely that crime would increase or safety would be compromised as a result of the HSNP.</p>
Deprivation  <i>(IMD – SOA data OCSI Community Insight Report)</i>	<p>The HSNA is made up 7 Local Super Output Areas (LSOA) and also includes small parts of 2 other LSOA. LSOA entirely within the HSNA are 016B, 016C, 016D, 019B, 019C, 019D and 019 E.</p> <p>Within “Overall Deprivation”, only 1 of the LSOA (the area around Denmark Villas, Ellen Street and Conway Street) is ranked amongst the most 20% deprived neighbourhoods in England.</p> <p>There are two domains of deprivation, “Health &amp; Disability “ and “Living Environment” whereby most LSOA located within the HSNA are ranked within the 20% or higher most deprived. Within Health &amp; Disability domain, one LSOA is within the 10%</p>	<p><b>Potential for adverse / beneficial impacts.</b> Only one of the LSOAs is within the 20% most deprived neighbourhoods (overall deprivation). The domains Health &amp; Disability and Living Environment are the predominant forms of deprivation throughout the HSNA, with all LSOA within the HSNA within the most 20% deprived living environment.</p> <p>The Health domain is linked to premature death and disability and therefore direct impacts from the HSNP are considered unlikely. However, measures resulting from the HSNP that promote healthy living and active lifestyles could <b>positively influence</b> the health domain.</p>

SEA feature	Further explanation / current situation	Impacts/Significance / Sensitivity
	<p>most deprived, and one LSOA is within the 20% most deprived. Within the Living Environment domain 5 LSOA are within the 10% most deprived and 2 LSOA are within the 20% most deprived.</p>	<p>The Living Environment domain is linked to lack of central heating, poor condition housing, air quality and road traffic accidents. The HSNA is unlikely to have any influence over the quality of existing housing. However the amounts of development proposed could <b>adversely influence</b> air quality and therefore the Living Environment domain. This could be of <b>medium significance</b> due to the sensitivity of the area but taking into account the proportion of this domain that is based on air quality.</p>
<p>Health</p> <p><i>(OCSI Community Insight Report)</i></p>	<p>Life expectancy for both men and women in the HSNA is lower than both the BH and England average. 2 out of 7 LSOA within the HSNA are ranked among either the 10% or 20% most deprived (health – IMD 2015). Overall, there is a higher proportion of hospital admissions (across various causes) than BH averages.</p>	<p><b>Impacts Unlikely.</b> It is considered unlikely that the HSNP will have any significant influence over health although it could have a positive influence if healthy and active lifestyles are promoted or includes measures to facilitate healthy lifestyles.</p>
<p>Noise</p> <p><i>(Defra noise map)</i></p>	<p>DEFRA noise mapping indicates that road traffic is the main source of noise pollution in the HSNA. Sackville Road and Old Shoreham Road have the highest levels of noise pollution, at around the 70-75 decibel range. The Sackville Road/Old Shoreham Road junction sustains levels of noise higher than 75 decibels. The majority of other roads within the HSNA are around the 60-65 decibel range with levels at around 65-70 decibels around junctions. The railway is also a significant contributor to noise throughout the area, with levels of 70-75 decibels along the rail-track. The WHO suggests that background noise at a level greater than 55 decibels can pose an annoyance.</p>	<p><b>Potential for adverse impacts.</b> Noise is an issue along main roads. Any increase in traffic could further increase existing road noise issues, which would increase noise nuisance. This is considered to be of <b>medium significance</b>.</p>

### 4.3 Assessment of the Characteristics of the Neighbourhood Plan

This stage of the screening assessed the Vision and Objectives of the Hove Station Neighbourhood Plan against the criteria (1a-1e) as set out in the SEA Regulations.

**Table 2 Characteristics of the Neighbourhood Plan**

Criteria	Summary of Effects	Significant? Yes/No
(1a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The Hove Station Neighbourhood Plan will form part of the statutory development plan once adopted and will therefore exert a direct influence over development proposals coming forward in the Neighbourhood Area.</p> <p>Neighbourhood Plans, once made, form part of the statutory Development Plan. It is equivalent to a Local Plan in legal status in the hierarchy of planning documents. The Development Plan for the city currently includes the saved policies in the adopted Brighton &amp; Hove Local Plan 2005 and the City Plan Part 1, adopted March 2016.</p> <p>However, the Hove Station Neighbourhood Plan only sets a framework for developments located within the neighbourhood area and will have no influence on planning decisions outside this area. It could however have effects outside it's boundary, for example, the potential for traffic impacts.</p>	Yes
(1b) the degree to which the plan or programme influences other plans including those in a hierarchy;	<p>The Hove Station Neighbourhood Plan will respond to rather than influence other plans or programmes. It is equivalent to a local plan in status, however is unlikely to influence other plans and must be in general conformity with the strategic policies set out in the City Plan.</p>	No
(1c) the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>The Neighbourhood Plan must be in conformity with national planning policy, the NPPF. All plans have an obligation to deliver sustainable development and therefore it should help to deliver sustainable development, including consideration of the environment.</p>	Yes
(1d) environmental problems relevant to the plan;	<p>There are a number of local <b>environmental</b> issues which are of relevance / more sensitive to the Plan, as described in full in Table 1. These could be affected in an adverse way and are considered to be of medium to high significance. These are summarised as:</p> <ul style="list-style-type: none"> <li>- Water: quality and supply (medium</li> </ul>	Some, yes.

	<p>significance/sensitivity)</p> <ul style="list-style-type: none"> <li>- Air quality (high)</li> <li>- Congestion and transport patterns (high)</li> <li>- Surface water flood risk (high)</li> </ul> <p>It should be noted that there are other non-environmental issues which are of relevance /more sensitive to the Plan also, as follows:</p> <ul style="list-style-type: none"> <li>- Historic built environment (Conservation Areas and Listed Buildings) (medium)</li> <li>- Local infrastructure: schools (high), health services (medium), open space (medium)</li> <li>- Jobs &amp; employment (high)</li> <li>- Some aspects of deprivation (high)</li> <li>- Noise (medium)</li> </ul> <p>There are also some issues/problems that could be affected in a positive way:</p> <ul style="list-style-type: none"> <li>- Contaminated land (medium)</li> <li>- Housing (high)</li> <li>- Some aspects of deprivation (medium)</li> </ul>	
<p>(1e) the relevance of the plan for the implementation of community legislation on the environment (e.g. plans linked to waste or water protection)</p>	<p>The EU has adopted a range of legislation aimed at protecting the environment including:</p> <ul style="list-style-type: none"> <li>- EU Directive 2009/147/EC on the conservation of wild birds.</li> <li>- EU Directive 1992/43/EEC on the conservation of habitats.</li> <li>- EU Directive 2008/50/EC on ambient air quality and cleaner air.</li> <li>- EU Directive 2002/49/EC on environmental noise.</li> <li>- EU Directive 2008/98/EC waste framework directive.</li> <li>- EU Directive 2000/60/EC) water framework directive.</li> <li>- EU Directive 2007/60/EC assessment and management of flood risks.</li> </ul> <p>The Hove Station Neighbourhood Plan will be in compliance and accordance with the City Plan which has already taken account of the existing European and National legislative framework for environmental protection. It should therefore have a positive effect on compliance.</p>	<p>No</p>

#### 4.4 Assessment of the Effects of the Plan

This stage of the screening assessed the possible effects of the Plan against the criteria (2a-2g) as set out in the SEA Regulations. These criteria are used to determine the significance of the effects. This part of the assessment in particular uses the information set out in Table 1.

**Table 3: Effects of the Hove Station Neighbourhood Plan**

*Nb: It should be noted that the effects of the Hove Station Neighbourhood Plan are in addition to the effects already taken into account in the City Plan Part 1 (Development Area 6-Hove Station), due to the higher development quantum proposed.*

Criteria	Summary of Effects	Significant? Yes/No
(2a) What are the probability, duration, frequency and reversibility of the effects of the plan?	<p>As is evident from the HSNP the majority of change throughout the HSNA is anticipated to take place in the “Hove Station Quarter”. Therefore, the probability of some of the adverse effects occurring on the environmental problems outlined under (1d) in Table 2 above is considered to be high. This is due to this area being at risk of surface water flooding, this area including a Groundwater Source Protection Zone, this area including roads within the AQMA and suffering from congestion, and this area containing several Conservation Areas.</p> <p>Some adverse effects could be avoided through mitigation and design, e.g. impacts on the GSPZ, flood risk and the historic built environment. However some adverse effects may be less easy to mitigate, such as impacts on air quality and congestion.</p> <p>The probability of impacts on local infrastructure, namely schools and health services is also considered to be high, although it is acknowledged the HSNP refers to providing school and other infrastructure provision as required.</p> <p>The duration of the adverse effects is likely to be long-lived, due to the likely “life” of new development. Effects are considered to be permanent for this reason.</p> <p>Some positive effects are also probable. Such as positive effects on the local housing supply/affordability. These will also be long-lived and permanent in nature.</p>	Yes
(2b) What is the cumulative nature of the effects of the plan?	<p>Some of the themes of the Neighbourhood Plan could have adverse effects in-combination with other themes of the Plan. For example housing provision and mixed uses could both increase transport movements to and within the area with various impacts. Some of the themes of the Neighbourhood Plan could have positive effects in combination with other themes, e.g. reducing carbon emissions through sustainable building design, the</p>	Yes

	<p>prioritisation of sustainable travel and better connectivity and permeability could have positive effects on local carbon emissions.</p> <p>There could also be cumulative effects of the Neighbourhood Plan in combination with development coming forward in the local area that doesn't form part of the Neighbourhood Plan.</p>	
<p>(2c) What is the trans-boundary nature of the effects of the plan?</p>	<p>The City Plan Part 1 sets targets and policies to guide development within the Brighton &amp; Hove administrative area. There could be trans-boundary and cumulative effects arising from development within the Hove Station Neighbourhood Plan and the City Plan, which also includes policy DA6 Hove Station. This Development Area falls within the Hove Station Neighbourhood Area boundary and includes a strategic allocation at Conway Street. However, as the HSNP should be in general conformity with the City Plan, the policies should be in alignment rather than affecting each other in any other way.</p> <p>The SDNP Local Plan is in its early stages and will include policies and sites for development situated within the National Park. The South Downs National Park includes land within the Brighton &amp; Hove boundary, but not within the Hove Station Neighbourhood Area. It is considered unlikely that there will be any transboundary and cumulative effects arising from development within the Hove Station Neighbourhood Plan and the SDNP Local Plan.</p> <p>The Lewes District boundary adjoins the Brighton &amp; Hove City boundary to the east of the city, at Saltdean. The Lewes District Plan sets targets and policies to guide future development within the district. It is considered unlikely that there will be any transboundary and cumulative effects arising from development within the Hove Station Neighbourhood Plan and the Lewes District Local Plan.</p> <p>The Adur District boundary adjoins Brighton &amp; Hove City boundary to the west of the city at Portslade. The emerging Adur District Plan sets targets and policies to guide future development within the district. It is considered unlikely that there will be any transboundary and cumulative effects arising from development within the Hove Station Neighbourhood Plan and the Adur District Local Plan.</p> <p>A Joint Area Action Plan for the Shoreham Harbour area, in the west of the city, is currently being developed. It is considered unlikely that there will be any transboundary and cumulative effects arising from development within the</p>	<p>No</p>

	<p>Hove Station Neighbourhood Plan and the JAAP.</p> <p>A Neighbourhood Area has been designated for an area covering the majority of the Hove Park ward. This lies adjacent to the Hove Station Neighbourhood Area. There could be transboundary and cumulative effects arising from development within these two Neighbourhood Areas, however this is unknown until proposals for the Hove Park Neighbourhood Area come forward.</p>	
<p>(2d) Are there any risks to human health or the environment (e.g. due to accidents)?</p>	<p>The AQMA 2013 includes Sackville Road and Old Shoreham Road which are both within the Hove Station Neighbourhood Area.</p> <p>Poor air quality poses a significant health risk, particular to the young, old and those with certain health issues. Any development coming forward in the area as a result of the Neighbourhood Plan could worsen air quality, having indirect effects on health. It is noted that the majority of development proposed within the Neighbourhood Area is to the north and south of the railway station and is therefore likely to result in increased traffic movements on roads that are within the AQMA. Impacts arising from the Hove Station Neighbourhood Plan are anticipated to be greater than those anticipated to arise from the City Plan Part 1 policy DA6 due to the increased amounts of development proposed.</p> <p>Any policies which result in an improvement to air quality would have obvious health benefits.</p> <p>There are some areas within the HSNA that are known to include contaminated land due to current/previous uses, e.g. Sackville coal-yard and potentially land currently in employment uses, however it is assumed that any redevelopment of these sites would involve full remediation of the land, therefore risks to human health from contaminated land are considered to be low.</p> <p>There are not considered to be any other risks to human health.</p>	Yes
<p>(2e) What is the magnitude and spatial extent of the effects (i.e. geographical area and size of population likely to be affected) of the plan?</p>	<p>The Hove Station NA covers an area of approximately 1km<sup>2</sup> (100 hectares).</p> <p>The population within the Hove Station Neighbourhood Area is estimated to be around 14,000.<sup>7</sup></p> <p>This magnitude and spatial extent of the Plan is therefore considered to be relatively small, although the population density of the area is fairly high with a population density of 140 people per hectare.</p>	No.
<p>(2f) Is the value and vulnerability of the area to which the plan or</p>	<p>There are a number of valued environmental receptors/issues which are considered to be vulnerable to the effects of the Plan.</p>	Yes

<sup>7</sup> Local Insight Profile for Hove Station Neighbourhood Area – April 2016

<p>programme relates likely to be affected by the plan or programmes due to:</p> <ul style="list-style-type: none"> <li>• Special natural characteristics or cultural heritage,</li> <li>• Exceeded environmental quality standards or limit values, or</li> <li>• Intensive Land use?</li> </ul>	<p>Special characteristics: There are four Conservation Areas which covers around a quarter of the area within the Neighbourhood Area, as well as a number of Listed Buildings.</p> <p>Exceeded environmental limits: Sackville Road and parts of Old Shoreham Road, both of which run through the Hove Station Neighbourhood Area is part of the AQMA 2013 due to the exceedence of NO2. Most of the Neighbourhood Area overlies a Groundwater Source Protection Zone and the water quality of the Brighton Calk Aquifer is classified as poor.</p> <p>Intensive Land Use: The population density is higher within the Neighbourhood Area when compared to the Brighton and Hove average (140 people/hectare compared to 33 people/hectare). This is likely to be reflective of the high rise flats and terraced housing, much of which has been converted into flats, that can be found throughout the area.</p>	
<p>(2g) Will the plan have an effect on areas or landscapes, which have a recognised national, community or international protection status?</p>	<p>The Hove Station Neighbourhood Area is located well within the Brighton &amp; Hove built up area boundary. It does not include any land that is within the South Downs National Park, nor is it immediately adjacent to the SDNP boundary.</p> <p>Although development situated outside the SDNP can have an adverse effect on the SDNP due to impacts on views of or from the national park, it is considered unlikely that the Neighbourhood Plan would have a significant effect due to the existing urbanised nature of the area.</p> <p>The Castle Hill Special Area of Conservation is located within the city's boundary and lies approximately 8km to the west of the Neighbourhood Area boundary. It is considered unlikely that the Neighbourhood Plan will have any adverse impacts on the SAC.</p>	<p>No</p>

## 5. Summary of initial findings from the screening exercise

- 5.1 The information set out in Section 4 helped to identify local issues and the assessment of these issues against the criteria set out in the Regulations helped to determine whether the characteristics and effects of the plan are likely to be significant.
- 5.2 The draft screening concluded the following: although the spatial extent and magnitude of the Plan is considered to be relatively small, the Plan will have a direct effect over development that takes place within the Neighbourhood Area. There are a number of environmental issues or other receptors within the Neighbourhood Area that are considered to be sensitive to the effects of the Plan, including the AQMA, the Groundwater Source Protection Zone, surface water flood-risk, Conservation Areas, and school infrastructure, with some being of high sensitivity. Some of the effects could pose a risk to human health, some of the effects are considered highly probable and could be permanent in nature, and the Plan could result in cumulative effects in combination with other Plans. The combination of these factors results in some of the effects being considered to be significant in nature and it is **therefore recommended that a SEA should be carried out on the Hove Station Neighbourhood Plan.**
- 5.3 The draft screening recommended that all issues where there is potential for adverse impact, and where the significance of the impact would be high due to the sensitivity of the receptor, should be considered further in a Strategic Environmental Assessment. These are listed under the SEA headings as follows:

### Air & Climatic Factors:

- AQMA
- Transport and congestion
- Surface Water Flood Risk

### Material Assets:

- Infrastructure (schools)
- Local economy

- 5.4 In addition, the draft screening recommended taking a precautionary approach, by considering the issues where there is potential for adverse impact, where the extent of the impact is considered to be of medium significance. These are listed under the SEA headings as follows:

### Water

- Quality and supply

### Cultural Heritage:

- Conservation Areas
- Listed Buildings

### Material Assets:

- Open Space
- Health infrastructure

Population & Human Health:

- Noise
- (also linked to air quality)

5.5 The draft screening outlined that this would not be confirmed until the three statutory bodies had been consulted.

## 6. Final Conclusion & Consultation

### 6.1 Brighton & Hove City Council Initial Conclusion

On the basis of the screening process, the results from Tables 1, 2 and 3 showed the potential for significant effects arising from the Hove Station Neighbourhood Plan. As such, prior to consultation, it was the council's opinion that an **SEA would be required** to be undertaken looking in particular at the impacts on issues set out in paragraphs 5.3 and 5.4.

### 6.2 Consultation with statutory environmental bodies

As required by 9 (2b) of the Regulations the three statutory environmental consultation bodies were consulted upon the initial screening report during October and November 2016. Their full responses can be found in Appendix B. The responses are summarised as follows:

Consultation Body	Comments
Historic England	Confirms agreement with the screening opinion, including the need to consider the effects of the Plan on the conservation areas and listed buildings within the Plan area.
Environment Agency	Considers that the Plan has the potential to give rise to significant environmental effects for areas within their remit due to: <ul style="list-style-type: none"><li>• the potential amount of housing to be delivered (noted that the amount is above the figure allocated in the City Plan)</li><li>• development on potentially contaminated land above the Brighton Chalk Aquifer, which is a major public water supply and is vulnerable to pollution</li></ul>
Natural England	No response received

### 6.3 Final conclusion

The results of the screening process, in combination with the comments from the statutory bodies, indicates that a Strategic Environmental Assessment of the Hove Station Neighbourhood Plan is required based on the following:

- Although the spatial extent and magnitude of the Plan is considered to be relatively small, the Plan will have a direct effect over development that takes place within the Neighbourhood Area.
- There are a number of environmental issues or other receptors within the Neighbourhood Area that are considered to be sensitive to the effects of the Plan, including the AQMA, the Groundwater Source Protection Zone,

surface water flood-risk, Conservation Areas, and school infrastructure, with some being of high sensitivity.

- Some of the effects could pose a risk to human health.
- Some of the effects are considered highly probable and could be permanent in nature.
- The Plan could result in cumulative effects in combination with other Plans.

The combination of these factors results in some of the effects being considered to be significant in nature. An SEA should cover the topics and issues as identified in this report and outlined below.

Air & Climatic Factors:

- AQMA
- Transport and congestion
- Surface Water Flood Risk

Material Assets:

- Infrastructure (schools)
- Local economy

Water

- Quality and supply (also linked to Climatic Factors)

Cultural Heritage:

- Conservation Areas
- Listed Buildings

Material Assets:

- Open Space
- Health infrastructure

Population & Human Health:

- Noise (also linked to air quality)

## 7. Responsibilities and Next Steps

### 7.1 Responsibilities

Following a screening determination which indicates that an SEA is required, it is the responsibility of the Neighbourhood Forum to ensure an SEA is undertaken. This can be undertaken by the Forum itself, or another body on its behalf.

It is the responsibility of Brighton & Hove City Council to ensure that all the regulatory requirements appropriate to the Neighbourhood Plan have been in met, and that it is compatible with EU obligations, which include the SEA Directive, in order for it to progress to subsequent plan-making stages.

### Stages of Strategic Environmental Assessment

#### 7.2 Scoping Stage

This stage should meet the requirements of paragraphs 1-5 of Schedule 2 of the SEA Regulations and should set out the scope of the SEA. The following table describes what questions that the Scoping Report should address and the according regulatory requirements.

Scoping Report question	In line with Schedule 2 of the SEA Regulations the scoping report must include...
What is the plan seeking to achieve?	<ul style="list-style-type: none"><li>• An outline of the contents, the main objectives of the plan and the relationship with other relevant plans and programmes.</li></ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"><li>• The relevant environmental protection objectives, established at international or national level;</li><li>• The relationship between the plan and other relevant plans and programmes.</li></ul>
What is the sustainability 'baseline'?	<ul style="list-style-type: none"><li>• The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;</li><li>• The environmental characteristics of areas likely to be significantly affected; (nb those identified in the screening report)</li><li>• Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li></ul>
What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"><li>• Key problems / issues and objectives that should be a focus of (i.e. provide a "framework" for) appraisal. (Nb: this should be based on the issues identified in the screening report see section 5 and section 7.3).</li></ul>

The Scoping Report must meet the requirements of Regulation 12 (5 and 6) by formally consulting the three statutory consultees (Environment Agency, Natural England, and Historic England) for a period of 5 weeks and any other body which is considered relevant.

### 7.3 Future Appraisal Framework

As described above, part of the process of the Scoping Stage is to establish an “appraisal framework” against which the Neighbourhood Plan will be assessed. This consists of a range of appraisal objectives that cover a range of issues, to assess the likely impacts of the HSNP.

The Sustainability Appraisal Scoping Report for City Plan Part 2 has recently been published and consulted upon. This includes a Framework consisting of 19 appraisal objectives which will be used to assess the emerging City Plan Part 2 and any further planning documents produced by the city council. In order to maintain a degree of consistency it is suggested that the relevant Appraisal Objectives developed for the City Plan Part 2 could be used to assess the emerging HSNP in a future Strategic Environmental Assessment. Making use of the same Sustainability Appraisal objectives to appraise all planning documents applicable to development across the city helps to bring a certain degree of consistency across assessments and is an approach currently being used by other local authorities.

The full Sustainability Appraisal is shown in the following list. The **Appraisal Objectives in bold** are considered to be those of most relevance to the issues/opportunities identified in this screening report. However those not in bold may also want to be considered by the Neighbourhood Forum.

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

- 16. To improve health and well-being, and reduce inequalities in health.**  
 17. To improve community safety, and reduce crime and fear of crime.  
 18. To increase equality and social inclusion.  
**19. To contribute towards the growth of a sustainable and diverse economy, increase employment opportunities and meet local employment needs.**

A full copy of the Sustainability Appraisal Framework for the City Plan Part 2, with decision making criteria which guide the appraisals, can be made available on request.

#### **7.4 Appraisal Stage**

This stage must meet the requirements of paragraphs 6-10 of Schedule 2 and Regulation 12 (2-3) of the SEA Regulations. The results of this stage are published in a SEA Report, also referred to as the Environmental Report. The following table describes the questions this stage of the SEA process should address and the according regulatory requirements.

<b>Environmental Report question</b>	<b>In line with Schedule 2 of the SEA Regulations and Regulation 12 (2-3) the Environment Report must include...</b>
<b>How has the appraisal been carried out / methodology</b>	<ul style="list-style-type: none"> <li>• A description of how the assessment was undertaken including any difficulties encountered</li> </ul>
<b>What options have been put forward for appraisal</b>	<ul style="list-style-type: none"> <li>• An outline of the reasons for selecting the alternatives dealt with.</li> </ul>
<b>What are the appraisal findings of alternative options</b>	<ul style="list-style-type: none"> <li>• The report shall identify, describe and evaluate the likely significant effects of reasonable alternatives.</li> <li>• The likely significant effects on the environment, including short, medium and long-term, permanent, temporary, positive, negative, secondary, cumulative and synergistic on relevant issues.</li> </ul>
<b>What are the appraisal findings at this stage</b>	<ul style="list-style-type: none"> <li>• The report shall identify, describe and evaluate the likely significant effects of implementing the plan.</li> <li>• The likely significant effects on the environment, including short, medium and long-term, permanent, temporary, positive, negative, secondary, cumulative and synergistic on relevant issues.</li> </ul>
<b>What mitigation will be used to reduce the effects</b>	<ul style="list-style-type: none"> <li>• The measures envisaged to prevent, reduce and offset any significant adverse effects of</li> </ul>

	implementing the plan.
<b>What monitoring will be put in place</b>	<ul style="list-style-type: none"> <li>• A description of the measures envisaged concerning monitoring the effects of the plan.</li> </ul>

As the appraisal stage should help to inform the production of the Plan, it should be consulted upon alongside the various versions of the Plan. Any changes or modifications to the Plan following consultation may also require the need for further appraisal, depending on how significant the changes are, and should again be set out in an updated Environmental Report to accompany the final version of the Plan.

When an SEA has been determined to be required, an SEA report must be submitted to the Local Planning Authority at pre-submission stage (as required by National Planning Practice Guidance paragraph 031<sup>8</sup>).

### Data sources

- Environment Agency maps – what’s in your backyard. <http://apps.environment-agency.gov.uk/wiyby/>
- Historic England website <https://historicengland.org.uk/listing/the-list/>
- Noise mapping: <http://services.defra.gov.uk/wps/portal/noise/maps>
- Open Space Study Update 2011 (BHCC)
- Community Insight – Local Insight Profile for Hove Station Neighbourhood Area – published April 2016 <http://brighton-hove.communityinsight.org/>
- Neighbourhood Statistics <https://www.neighbourhood.statistics.gov.uk/dissemination/>
- Nhs.uk
- Census data <https://www.ons.gov.uk/census/2011census>
- Index for Multiple Deprivation data 2015 <http://dclgapps.communities.gov.uk/imd/idmap.html>

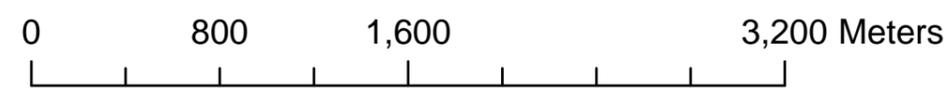
<sup>8</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>

**Appendix A Map of Hove Station Neighbourhood Area and Castle Hill SAC**

# Hove Station Neighbourhood Area: HRA screening map



**(A3) Scale: 1:30,000**



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**Appendix B – Consultation Comments**

**From:** [PlanningSSD](#)  
**To:** [Helen Pennington](#)  
**Subject:** Consultation on SEA screening for Hove Station Neighbourhood Plan  
**Date:** 01 November 2016 15:01:24

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Dear Helen

Thank you for consulting the Environment Agency on the Hove Station SEA screening report. We appreciate that a neighbourhood development plan may require a strategic environmental assessment (SEA) under the Directive and early SEA screening is advised. The Environment Agency may be able to assist the Local Planning Authority at this stage by advising on whether your plan will result in significant environmental impacts within our remit. However, please note that we do not advise on whether the plan falls under the requirements of the SEA Directive.

For the following combined reasons we agree with the findings in the report that the Neighbourhood Plan has the potential to give rise to significant environmental effects for areas within our remit as follows:

- 1) Potential size of the housing allocation (1,333 housing units) (which the report states is above figures allocated for this area in the City Plan) and
- 2) Development on potentially contaminated land above the Brighton Chalk Aquifer. As stated in the report, the Aquifer is a major public water supply and is vulnerable to pollution.

Please note, as management and responsibility for Surface Water flooding rests with the Lead Local Flood Authority, we would recommend that the significance of this issue with regard a screening opinion is discussed with Maggie Moran, Flood Risk Officer at B & HCC.

Best Wishes

Marguerite

Marguerite Oxley|Technical Specialist|Sustainable Places|Solent and South Downs Area|  
Environment Planning and Engagement|Environment Agency|Guildbourne House|Chatsworth Road|  
Worthing|West Sussex|BN11 1LD

Tel external: 02030257171|Tel internal: 57171|Mobile:-  
Email :- [marguerite.oxley@environment-agency.gov.uk](mailto:marguerite.oxley@environment-agency.gov.uk) (or [PlanningSSD@environment-agency.gov.uk](mailto:PlanningSSD@environment-agency.gov.uk))

Our Commitment:  
Sustainable Places will prioritise and drive forward environmental outcomes from our work with local authorities and partners across the Solent and South Downs Area

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We offer a cost recovery service for bespoke pre-application advice. For more information go to: [gov.uk](http://gov.uk) or [email us](#)

**From:** [Lloyd Sweet, Robert](#)  
**To:** [Helen Pennington](#)  
**Subject:** RE: Consultation on SEA screening for Hove Station Neighbourhood Plan  
**Date:** 01 November 2016 17:15:24

---

Thank you for consulting Historic England

I'm happy to confirm our agreement with the screening opinion, including the need to consider the effects of the plan on the conservation areas and listed buildings within the plan area in particular.

Yours sincerely

Robert Lloyd-Sweet

Rob Lloyd-Sweet | Historic Places Adviser | Historic Places | South East  
Direct Line: 01483 252028  
Mobile:

Historic England | Eastgate Court | 195 – 205 High Street  
Guildford | GU1 3EH



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**From:** Helen Pennington [mailto:Helen.Pennington@brighton-hove.gov.uk]  
**Sent:** 03 October 2016 13:10  
**To:** [planningssd@environment-agency.gov.uk](mailto:planningssd@environment-agency.gov.uk); [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk); South East Region  
**Subject:** Consultation on SEA screening for Hove Station Neighbourhood Plan

Dear Statutory Consultees

Please find attached a draft SEA screening for the Hove Station Neighbourhood Plan.

This report has been prepared in accordance with Regulation 9 and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Brighton & Hove City Council is of the opinion that the Hove Station Neighbourhood Plan could give rise to significant effects, and therefore will require a Strategic Environmental Assessment. The reasons for this are set out in the attached screening report.

Prior to making a formal determination, we would like to consult you on the findings of the draft screening report.

Please note the screening report also contains a "pre-screening" for Habitats Regulations Assessment (Annex 1).

Please could any comments on the draft screening report be sent to myself within 28 days, by 5pm on Tuesday 1<sup>st</sup> November.

Best regards

Helen Pennington

**Helen Pennington**  
**Sustainability Appraisal Officer**  
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City Development & Regeneration

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I work Mondays, Tuesdays, Wednesdays and Thursdays

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## **Annex 1 Pre-screening for Habitats Regulations Assessment**

### **Habitat Regulations Assessment pre-screening notification Hove Station Neighbourhood Area August 2016**

#### **1. Introduction**

1.1 This initial Habitat Regulations Assessment (HRA) pre-screening has been undertaken to assess whether any European sites exist within or in proximity to the neighbourhood area which could potentially be affected by any future proposals or policies within the Neighbourhood Plan.

1.2 Where a European site does exist, this pre-screening report sets out the council's opinion on whether the Neighbourhood Plan could affect the designated features of the site and whether a full screening to meet the requirements of the Conservation of Habitats and Species Regulations should take place as the Neighbourhood Plan is developed further.

1/3 The purpose of this report is to provide an early indication to the Hove Station Neighbourhood Forum whether the Neighbourhood Plan is likely to require a full screening/HRA assessment. This report is based on the Hove Station Neighbourhood Plan Vision & Objectives 2016.

#### **2. European sites**

2.1 There is a network of protected sites across Europe, which includes Special Protected Areas (SPA), Special Areas of Conservation (SAC) and RAMSAR sites. These sites are designated for their fauna, flora or birds under the EC Birds or Habitats Directives. The majority of these sites are also Sites of Special Scientific Interest (SSSI).

2.2 All plans and projects, which may have a significant effect on the designated features of one of these sites, are required to undertake a Habitat Regulations Assessment to meet the requirements of the Conservation of Habitats and Species Regulations. There are various stages to a HRA assessment including the screening stage, which assesses the likelihood of impacts. A full Habitat Regulations Assessment (also known as an Appropriate Assessment) is then only required to take place if the screening stage indicates that significant impacts on the designated features are likely.

#### **3. Local European Sites**

3.1 The Hove Station Neighbourhood Area covers an area of approximately 1 sqm in the central Hove area. See map in Appendix A.

3.2 Castle Hill is the only SAC within Brighton & Hove. As is evident from the map the Neighbourhood Area is not in close proximity to the Castle Hill SAC, with it situated approximately 8km to the west of the Neighbourhood Area. In addition, the Lewes Downs SAC

is located approximately 6km from the nearest point of the city boundary, and approximately 16km from the Neighbourhood Area boundary.

3.3 Within the wider area, the Arun Valley SAC/SPA, Ashdown Forest SAC/SPA and Pevensey Levels SAC/RAMSAR site are all located more than 20km the Neighbourhood Area boundary. These sites are not considered any further in this assessment due to their distance from the Neighbourhood Area.

3.4 The following table sets out the reason for the sites' designations, potential issues and approximate distance from Hove Station Neighbourhood Area boundary. These sites will be considered further in this pre-screening report.

**Table to show SACs within 20km of the Hove Station Neighbourhood Area**

Site	Designation	Potential Issues and problems	Closest distance to BH (km)	Closest distance to HSNA boundary (km)
Castle Hill SAC	Chalk grassland with a mosaic of calcareous semi-natural dry grassland communities. Important assemblage of rare and scarce species including early spider orchid (one of the largest colonies in the UK), early gentian and burnt orchid.	Air pollution or inadequate grazing can lead to scrub encroachment. Leaching and spray drift from surrounding farmland.	Within BH boundary	Approx. 8km
Lewes Downs SAC	Chalk grassland with Festuca ovina – Avenula pratensis and Bromus erectus calcareous grasslands. Important assemblage of rare and scarce orchids.	Air pollution can exacerbate scrub encroachment. Leaching and spray drift from surrounding farmland.	6	Approx. 16km

#### 4. Brighton & Hove City Plan Part 1 – HRA screening

4.1 A screening under the Habitats Regulations<sup>9</sup> was undertaken for the City Plan Part 1 at various stages of plan production. The most recent assessment followed the Examination in Public at Proposed Modification stage 2014. At this stage, the City Plan set out a housing target of 13,200 dwellings to be delivered over the plan period, as well as other quantum of

<sup>9</sup> [HRA screening](#)

development. This included the urban fringe as a broad source of potential for housing, capable of delivering 1,200 dwellings in total. The City Plan was adopted in March 2016.

4.2 The HRA screening assessed the likely impacts of the proposed amounts of development set out in the City Plan on European Sites within 20km of its boundary including Castle Hill, Lewes Downs and Ashdown Forest. It concluded that the possible adverse impacts amounted to water abstraction, air pollution and recreational pressure. Of these:

- *Water abstraction would not have a significant effect on any European site because there are no such sites which are vulnerable to water abstraction within the water catchment area of Brighton and Hove.*
- *Despite policies which promote travel choice and minimise air pollution, it is still possible that air pollution may worsen as a result of the City Plan Part 1. However localised air pollution of this nature would not have a significant effect on any European site, according to Natural England advice.*
- *Recreational pressure on downland in the vicinity of Brighton and Hove may increase as a consequence of the City Plan Part 1. However only one of the European sites assessed is vulnerable to recreational pressure (Ashdown Forest) and studies elsewhere have shown that this site is far enough away from Brighton and Hove to safely conclude that there would be no significant recreational impact on it as a result of the City Plan Part 1.*

4.3 Therefore the HRA screening on the City Plan Part 1 (Proposed Modifications) discounted all possible significant impacts that would affect the designations of the SACs or SPA and therefore did not progress to a full Habitats Regulations Assessment (Appropriate Assessment).

## **5. Hove Station Neighbourhood Plan - Vision & Objectives**

5.1 The Hove Station Neighbourhood Plan must be in conformity with the local development plan, as well as national planning policy. This includes both the saved policies in the Brighton & Hove Local Plan (2005) and the City Plan Part 1 (2016).

5.2 The overall vision for the Hove Station Neighbourhood Plan is:

*To facilitate the regeneration of the Hove Station Neighbourhood Area and realise its potential by creating a vibrant, coherent community which is a great place to live, work and relax in.*

The plan aims to achieve:

- *A strong and diverse community;*
- *Mixed but complementary land uses although predominantly residential;*
- *Better connectivity and permeability through the area – especially across the railway divide;*

- *Prioritising sustainable travel and unlocking existing transport bottlenecks;*
- *Rich urban character drawing on historical design/architectural legacy;*
- *“Urban” high density: mid-rise development as standard with landmark high rise developments as signature projects at key locations;*
- *Housing with good space and sustainability standards based on national standards;*
- *New and improved social facilities, schools, nurseries, as needed for the increased population;*
- *Green, natural and attractive with spaces for communal activities;*
- *Reduced carbon emissions through low carbon new buildings, improved energy efficiency of existing buildings, sustainable and local generation and use of renewable energy;*

*“The vision for the areas north and south of Hove Station, Development Area 6 of the City Plan (DA6), is that it will undergo wholesale redevelopment during the plan period (up to 2030). The remaining areas of the Hove Station Neighbourhood will be subject to less change and the plan sets out some minor, but important proposals that are essential for those areas.”*

5.3 It is evident from the Vision & Objectives that the Neighbourhood Plan will include land allocations, with particular reference to areas of land south of the railway line around Hove Station, including the Conway Street area as well as the Sackville Road Trading Estate, with quantum of development likely to “substantially exceed the allocations suggested in the City Plan”.

## **6. Natural England - Impact Risk Zones**

6.1 Natural England have produced the Impact Risk Zone dataset<sup>10</sup> which maps zones around each Site of Special Scientific Interest according to the particular sensitivities of the features for which it is notified. It also specifies the types of development that have the potential to have adverse impacts. This tool is mainly used at planning application stage to determine whether a proposed development requires more detailed consideration as part of Natural England’s consultation process. However, it is also a useful tool in helping to identify potential risks at plan-making stage.

6.2 As the basis of the SAC designation is underpinned by the SSSI designation, it can be assumed that if a development has an impact on the SSSI characteristics, it will also impact on the characteristics of the SAC.

### Impacts on the Castle Hill SAC

6.3 The IRZ tool assesses the potential for adverse impacts on the designation arising from different types of development at the following approximate distances from the site: within 50m, 50-200m, 200-500m, 500-1000m, 1000-2000m.

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<sup>10</sup> SSSI Impact Risk Zone dataset can be found on <http://magic.defra.gov.uk/MagicMap.aspx>

6.4 Distances greater than this range are not considered further by the toolkit, and it is therefore assumed that development outside this range is not considered to pose a risk to the designation. At approximately 8000m, the Hove Station Neighbourhood Area is therefore considered to be well outside the zone of influence and is not considered to pose a risk to the Castle Hill SAC designation.

#### Lewes Downs SAC

6.5 The Impact Risk Zone tool does not identify development within the Hove Station Neighbourhood Area to pose a risk to the Lewes Downs SAC, due to the distance from the designation and the potential issues and problems with the SAC.

## **7. Conclusion**

7.1 This purpose of this pre-screening report is to provide an early indication of whether a more detailed HRA assessment is likely to be required for the Hove Station Neighbourhood Plan. From the consideration of the local area, sites and issues, this report concludes that a full HRA screening, or **full HRA assessment is not required** for the Hove Station Neighbourhood Plan.

This is based on:

- The Vision and Objectives
- The distance of the Hove Station Neighbourhood Area to the Castle Hill SAC
- The conclusion of the HRA Screening for the City Plan Part 1 (Proposed Modifications)